# AIR QUALITY AND GREENHOUSE GAS TECHNICAL STUDY

# WAREHOUSE PROJECT AT

# 32291 CORYDON ROAD, LAKE ELSINORE

**Prepared for***:*

**RD Construction**
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**Submitted: May 17, 2023**
**Updated: November 12, 2025**

## TABLE OF CONTENTS

## TABLES



## APPENDICES

## GLOSSARY OF TERMS AND ACRONYMS

| Acronym | Description |
|---|---|
| AB | Assembly Bill |
| ACC | Advanced Clean Cars |
| ADTs | Average Daily Trips |
| APCD | Air Pollution Control District |
| APS | Alternate Planning Strategy |
| AQ | Air Quality |
| AQMP | Air Quality Management Plan |
| CAA | Clean Air Act |
| CAAA | Clean Air Act Amendments |
| CAAQS | California Ambient Air Quality Standards |
| CalEEMod | California Emissions Estimator Model |
| CalEPA | California Environmental Protection Agency |
| CALGreen | California Green Building Standards |
| CAP | Climate Action Plan |
| CAPCOA | California Air Pollution Control Officers Association |
| CARB | California Air Resources Board |
| CCAA | California Clean Air Act |
| CCR | California Code of Regulations |
| CEC | California Energy Commission |
| CEQA | California Environmental Quality Act |
| CEUS | California Commercial End Use Survey |
| CFCs | Chlorofluorocarbons |
| CFR | Code of Federal Regulations |
| $CH_4$ | Methane |
| CO | Carbon Monoxide |
| $CO_2$ | Carbon Dioxide |
| $CO_2e$ | Carbon Dioxide Equivalents |
| CUP | Conditional Use Permit |
| cy | Cubic Yards |
| DPM | Diesel Particulate Matter |
| DWR | Department of Water Resources |
| EIRs | Environmental Impact Reports |
| EO | Executive Order |
| EVCS | Electric Vehicle Charging Station |
| GHG | Greenhouse Gas |
| g/L | grams per Liter |
| HAPs | Hazardous Air Pollutants |
| HFCs | Hydrofluorocarbon |
| HRA | Health Risk Assessment |
| HSC | Health and Safety Code |
| IPCC | Intergovernmental Panel on Climate Change |
| lb/day | Pounds per Day |
| lb/yr | Pounds per Year |
| LCFS | Low Carbon Fuel Standard |
| LED | Low Emitting Diode |
| LEV | Low Emission Vehicle |
| LST | Localized Significance Threshold |

## GLOSSARY OF TERMS AND ACRONYMS

| Acronym | Description |
|---|---|
| MACT | Maximum Achievable Control Technologies |
| MMT | Million Metric Tons |
| µg/$m^3$ | Micrograms per cubic meter |
| MPO | Metropolitan Planning Organizations |
| MT | Metric Tons |
| $N_2O$ | Nitrous Oxide |
| NAAQS | National Ambient Air Quality Standards |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| $NO_2$ | Nitrogen Dioxide |
| $NO_x$ | Oxides of Nitrogen |
| OEHHA | Office of Environmental Health Hazard Assessment |
| $O_3$ | Ozone |
| OPR | Office of Planning and Research |
| Pb | Lead |
| PFCs | Perfluorocarbons |
| PHEV | Plug-in Hybrid Vehicle |
| PM | Particulate Matter |
| $PM_{10}$ | Particulate Matter less than or equivalent to 10 microns in diameter |
| $PM_{2.5}$ | Particulate Matter less than or equivalent to 2.5 microns in diameter |
| ppb | Parts Per Billion |
| ppm | Parts Per Million |
| RASS | Residential Appliance Saturation Survey |
| RPS | Renewables Portfolio Standard |
| RTP | Regional Transportation Plan |
| SB | Senate Bill |
| SCAB | South Coast Air Basin |
| SCAG | Southern California Association of Governments |
| SCAQMD | South Coast Air Quality Management District |
| SCS | Sustainable Community's Strategy |
| $SF_6$ | Sulfur Hexafluoride |
| SIP | State Implementation Plan |
| $SO_2$ | Sulfur Dioxide |
| $SO_x$ | Oxides of Sulfur |
| SP | Service Population |
| sq ft | Square Feet |
| SRA | Source Receptor Area |
| SRI | Solar Reflectance Index |
| TACs | Toxic Air Contaminants |
| US | United States |
| USEPA | United States Environmental Protection Agency |
| VMT | Vehicle Miles Traveled |
| VOC | Volatile Organic Compounds |
| yr | Year |
| ZEV | Zero Emission Vehicle |

# 1.0 INTRODUCTION

This report provides an analysis of the potential air quality (AQ) and greenhouse gas (GHG) impacts associated with the proposed Warehouse Project (Project) located at 32291 Corydon Road in the City of Lake Elsinore, California. This report has been prepared by BlueScape Environmental (BlueScape) to support the acquisition of a Conditional Use Permit (CUP) that the City of Lake Elsinore requires for projects of this type. This study analyzes the potential for permanent impacts associated with operation of the proposed Project and temporary impacts associated with construction activities in close proximity to the site.

Since the submittal of this report on May 17, 2023, an adjacent lot was added to the original Project site and the square footage of the warehouse buildings and parking areas has increased. This updated AQ/GHG report accounts for these changes, as well as updates to the construction schedule and first year of operations.

Air quality and GHG impacts will be attributable to emissions associated with construction, and operational emissions associated with traffic and energy use. This report presents an evaluation of existing conditions at the site, thresholds of significance, and potential air quality and GHG impacts associated with construction and operation of the Project.

## 1.1 Project Description

The Project is proposed to be located on two parcels encompassing approximately 2.88 acres (net), located northwest of Corydon Road, across from the corner of Bryant Street and Corydon Road, in the City of Lake Elsinore within Riverside County, which is located within the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project site is currently mostly vacant, with a row of trees at the southeast portion of the site. No buildings will be demolished prior to construction.

Site grading plans indicate that the Project will need to import approximately 4,776 cubic yards (cy) of fill material to achieve proper grading. Two warehouse buildings are proposed to be constructed on the property. Each of the two buildings is proposed to be 24,296 square feet (sq ft) containing two 4,613 sq ft mezzanines. Two trash enclosures, 180 sq ft each, are planned for the northwest sides of each of the two buildings. Parking would be provided as 93 parking spaces (including 4 Electric Vehicle Charging Station (EVCS) spaces) for the warehouses within a 51,353 sq ft paved area. The Conceptual Site Plan, for the 32291 Corydon Road Warehouse Project, is provided in Appendix A.

# 2.0 AIR QUALITY STUDY

The regional and local air quality impacts on sensitive receptors due to construction and operation of the Project have been quantified and compared to California Environmental Quality Act (CEQA) thresholds that the City of Lake Elsinore has

designated as acceptable for CEQA studies. These thresholds are those recommended by the SCAQMD as quantitative regional CEQA significance thresholds for temporary construction activities and long-term project operation in the South Coast Air Basin (SCAB) (SCAQMD 2023b).

## 2.1 Air Quality Regulatory Setting

Air pollutants are regulated at the national, state, and air basin level; each agency has a different degree of control. The United States Environmental Protection Agency (USEPA) regulates at the national level; the California Air Resources Control Board (CARB) regulates at the state level; and the SCAQMD regulates air quality in Riverside County. CARB establishes statewide air quality standards and is responsible for the control of mobile emission sources, while the local air districts are responsible for enforcing standards and regulating stationary sources. CARB has established 15 air basins statewide. The western portion of Riverside County is located in the SCAB, which is under the jurisdiction of the SCAQMD.

The SCAQMD is the agency responsible for achieving compliance with the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS), including criteria pollutants and their precursors. To that effect, the SCAQMD and the Southern California Association of Governments (SCAG) adopted the *2022 Air Quality Management Plan* (AQMP) in December 2022 (SCAQMD 2022). The AQMP addresses the SCAQMD's planning and progress for regional maintenance or attainment of the NAAQS and CAAQS. The AQMP forms the basis for the most recent California State Implementation Plan (SIP) update, as it contains documentation on emission inventories and trends, the SCAQMD's emission control strategy, and an attainment demonstration to show that the Basin will come into attainment with the NAAQS and CAAQS.

For the proposed Project to be consistent with the AQMP, the pollutants emitted from the Project should not exceed the SCAQMD daily thresholds or cause a significant impact on air quality. Additionally, if feasible mitigation measures are implemented and are shown to reduce the impact level from significant to less than significant, a project may be deemed consistent with the AQMP. A project may be considered significant under CEQA, on a regional basis, if it exceeds the SCAQMD thresholds for volatile organic compounds (VOCs), nitrogen oxides ($NO_X$), carbon monoxide (CO), sulfur oxides ($SO_X$), particulate matter with an aerodynamic diameter of 10 microns or less ($PM_{10}$), or particulate matter with an aerodynamic diameter of 2.5 microns or less ($PM_{2.5}$).

### 2.1.1 Federal

The federal and state governments have been empowered by respective federal and state Clean Air Acts (CAA) to regulate the emissions of airborne pollutants and have established ambient air quality standards for the protection of public health. The federal CAA requires the USEPA to set National Ambient Air Quality Standards (NAAQS) for pollutants that are common in outdoor air, considered harmful to public health and environment, and that come from numerous and diverse sources. In

California, the California Environmental Protection Agency (CalEPA), has delegated the oversight of air quality management to CARB, which is a department of the CalEPA. Local control over air quality management is provided by CARB through multi-county and county-level Air Pollution Control Districts (APCDs) (also referred to as Air Quality Management Districts). The federal and state standards are summarized in Table 1 (provided after Section 2.1.3) (CARB 2024a). The federal "primary" standards have been established to protect the public health. The federal "secondary" standards are intended to protect the nation's welfare and account for air pollutant effects on soil, water, visibility, materials, vegetation, and other aspects of the general welfare. The SCAQMD is the designated air quality control agency in the SCAB, which is a non-attainment area for the federal standards for ozone and $PM_{2.5}$. The SCAB is designated unclassifiable or in attainment for all other federal standards.

### 2.1.2 State

CARB, which became part of the CalEPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (CCAA), meeting state requirements of the federal Clean Air Act and establishing the California Ambient Air Quality Standards (CAAQS). It is also responsible for setting emission standards for vehicles sold in California and for other emission sources such as consumer products and certain off-road equipment. CARB also established passenger vehicle fuel specifications and oversees the functions of local air pollution control districts and air quality management districts, which in turn administer air quality activities at the regional and county level. The CCAA is administered by CARB at the state level and by the Air Quality Management Districts at the regional level. Similar to the federal CAA, the CCAA classifies specific geographic areas as either “attainment” or “non-attainment” areas for each pollutant, based on the comparison of measured data within the CAAQS. The SCAB is a non-attainment area for the state standards for ozone, $PM_{10}$ and $PM_{2.5}$ (SCAQMD 2018).

### 2.1.3 Local

Under state law, the SCAQMD is required to prepare a plan for air quality improvement for pollutants for which the District is in non-compliance. Each SCAQMD Air Quality Management Plan (AQMP) is an update of the previous plan and has a 20-year horizon. The latest AQMP, the 2022 AQMP, was adopted on December 2, 2022 (SCAQMD 2022). It addresses the requirements for meeting the more stringent NAAQS standard for primary and secondary ozone levels, finalized in 2015, to 70 parts per billion (ppb). The AQMP includes a discussion of emerging issues and opportunities, such as fugitive toxic particulate emissions, zero-emission mobile source control strategies, and the interacting dynamics among climate, energy, and air pollution. The plan also demonstrates strategies for attainment of the new federal 8-hour ozone standard and vehicle miles traveled (VMT) emissions offsets, pursuant to recent USEPA requirements (SCAQMD 2022).

**TABLE 1**
**NATIONAL AND STATE AMBIENT AIR QUALITY STANDARDS**

| Ambient Air Quality Standards | | | | | | |
|---|---|---|---|---|---|---|
| **Pollutant** | **Averaging Time** | **California Standards [1]** | | **National Standards [2]** | | |
| | | **Concentration [3]** | **Method [4]** | **Primary [3,5]** | **Secondary [3,6]** | **Method [7]** |
| **Ozone ($O_3$)[8]** | 1 Hour | 0.09 ppm (180 µg/m$^3$) | Ultraviolet Photometry | — | Same as Primary Standard | Ultraviolet Photometry |
| | 8 Hour | 0.070 ppm (137 µg/m$^3$) | | 0.070 ppm (137 µg/m$^3$) | | |
| **Respirable Particulate Matter (PM10)[9]** | 24 Hour | 50 µg/m$^3$ | Gravimetric or Beta Attenuation | 150 µg/m$^3$ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 20 µg/m$^3$ | | — | | |
| **Fine Particulate Matter (PM2.5)[9]** | 24 Hour | — | — | 35 µg/m$^3$ | Same as Primary Standard | Inertial Separation and Gravimetric Analysis |
| | Annual Arithmetic Mean | 12 µg/m$^3$ | Gravimetric or Beta Attenuation | 9.0 µg/m$^3$ | 15 µg/m$^3$ | |
| **Carbon Monoxide (CO)** | 1 Hour | 20 ppm (23 mg/m$^3$) | Non-Dispersive Infrared Photometry (NDIR) | 35 ppm (40 mg/m$^3$) | — | Non-Dispersive Infrared Photometry (NDIR) |
| | 8 Hour | 9.0 ppm (10 mg/m$^3$) | | 9 ppm (10 mg/m$^3$) | — | |
| | 8 Hour (Lake Tahoe) | 6 ppm (7 mg/m$^3$) | | — | — | |
| **Nitrogen Dioxide ($NO_2$)[10]** | 1 Hour | 0.18 ppm (339 µg/m$^3$) | Gas Phase Chemiluminescence | 100 ppb (188 µg/m$^3$) | — | Gas Phase Chemiluminescence |
| | Annual Arithmetic Mean | 0.030 ppm (57 µg/m$^3$) | | 0.053 ppm (100 µg/m$^3$) | Same as Primary Standard | |
| **Sulfur Dioxide ($SO_2$)[11]** | 1 Hour | 0.25 ppm (655 µg/m$^3$) | Ultraviolet Fluorescence | 75 ppb (196 µg/m$^3$) | — | Ultraviolet Flourescence; Spectrophotometry (Pararosaniline Method) |
| | 3 Hour | — | | — | 0.5 ppm (1300 µg/m$^3$) | |
| | 24 Hour | 0.04 ppm (105 µg/m$^3$) | | 0.14 ppm (for certain areas)[11] | — | |
| | Annual Arithmetic Mean | — | | 0.030 ppm (for certain areas)[11] | — | |
| **Lead[12,13]** | 30 Day Average | 1.5 µg/m$^3$ | Atomic Absorption | — | — | High Volume Sampler and Atomic Absorption |
| | Calendar Quarter | — | | 1.5 µg/m$^3$ (for certain areas)[12] | Same as Primary Standard | |
| | Rolling 3-Month Average | — | | 0.15 µg/m$^3$ | | |
| **Visibility Reducing Particles[14]** | 8 Hour | See footnote 14 | Beta Attenuation and Transmittance through Filter Tape | **No National Standards** | | |
| **Sulfates** | 24 Hour | 25 µg/m$^3$ | Ion Chromatography | | | |
| **Hydrogen Sulfide** | 1 Hour | 0.03 ppm (42 µg/m$^3$) | Ultraviolet Fluorescence | | | |
| **Vinyl Chloride[12]** | 24 Hour | 0.01 ppm (26 µg/m$^3$) | Gas Chromatography | | | |

**See footnotes on next page ...**

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the U.S. EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to the reference method” and must be approved by the U.S. EPA.

8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

9. On February 27, 2024, the national annual PM2.5 primary standard was lowered from 12.0 $\mu g/m^3$ to 9.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

11. On June 2, 2010, a new 1-hour $SO_2$ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 $SO_2$ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

### 2.1.4 State Implementation Plan

The federal CAA Amendments (CAAA) mandate that states submit and implement a State Implementation Plan (SIP) for areas not meeting air quality standards. SIPs are comprehensive plans that describe how an area will attain the NAAQS. SIPs are a compilation of new and previously submitted plans, programs (i.e., monitoring, modeling and permitting programs), district rules, state regulations and federal controls and include pollution control measures that demonstrate how the standards will be met through those measures.

The CARB is the lead agency for all purposes related to the SIP under state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register. All of the items included in the California SIP are listed in the Code of Federal Regulations (CFR) at 40 CFR 52.220. On September 22, 2022, CARB adopted the most recent state SIP strategy, which includes additional measures and information needed to support nonattainment area SIPs (CARB 2022a).

As the regional air quality management district, the SCAQMD is responsible for preparing and implementing the portion of the SIP applicable to the SCAB. The air pollution control district for each county adopts rules, regulations, and programs to attain federal and state air quality standards and appropriates money (including permit fees) to achieve these objectives (SCAQMD 2023a).

### 2.1.5 Air Pollutants of Concern

#### 2.1.5.1 Criteria Air Pollutants

The seven criteria air pollutants regulated under the NAAQS are as follows: ozone ($O_3$), CO, nitrogen dioxide ($NO_2$), $PM_{10}$, $PM_{2.5}$, sulfur dioxide ($SO_2$), and lead (Pb). Primary standards are designed to protect human health with an adequate margin of safety. Secondary standards are designed to protect property and the public welfare from air pollutants in the atmosphere. Areas that do not meet the NAAQS for a particular pollutant are considered to be “non-attainment areas” for that pollutant.

CARB is the state regulatory agency with authority to enforce regulations to both achieve and maintain air quality in the state. CARB is responsible for the development, adoption, and enforcement of the state’s motor vehicle emissions program, as well as the adoption of the CAAQS. The California Clean Air Act of 1988 (CCAA) provides the state with the ability to adopt ambient air quality standards and other regulations provided they are at least as stringent as federal standards, or more stringent.

Through the CCAA, CARB has established the CAAQS for the seven criteria air pollutants also regulated by the NAAQS and has also established CAAQS for additional pollutants, including sulfates, hydrogen sulfide, vinyl chloride and visibility-reducing

particles. The SCAB is currently classified as a non-attainment area under the CAAQS for $O_3$, $PM_{10}$, and $PM_{2.5}$. It should be noted that CARB does not differentiate between attainment of the 1-hour and 8-hour CAAQS for $O_3$; therefore, if an air basin records an exceedance of either standard, the area is considered non-attainment for the CAAQS for $O_3$. The SCAB has recorded exceedances of both the 1-hour and 8-hour CAAQS for $O_3$.

Table 2 shows the long- and short-term health impacts due to exposure to these criteria air pollutants and lists the main sources of these pollutants (USEPA 2025).

**TABLE 2**
**SUMMARY OF SOURCES AND HEALTH EFFECTS ASSOCIATED WITH CRITERIA AIR POLLUTANTS**

| Pollutant | Sources | Effects on Health |
|---|---|---|
| Ozone ($O_3$) | • Photochemical oxidant (not emitted directly); instead, chemically formed when volatile organic compounds (VOCs) and oxides of nitrogen ($NO_X$) react in the presence of ultraviolet light;<br>• Many VOCs are released as fugitive sources; and<br>• VOCs and $NO_X$ are combustion by-products. | • Respiratory symptoms<br>• Worsening of lung disease leading to premature death<br>• Damage to lung tissue |
| $PM_{2.5}$ (particulate matter [PM] less than 2.5 microns in aerodynamic diameter) | • Fugitive dust PM primarily composed of $PM_{10}$ with a small fraction consisting of $PM_{2.5}$;<br>• PM from combustion sources primarily composed of $PM_{2.5}$ with a small fraction consisting of particles larger than $PM_{2.5}$ and smaller than $PM_{10}$. | • Premature death<br>• Hospitalization for worsening of cardiovascular disease<br>• Hospitalization for respiratory disease<br>• Asthma-related emergency room visits<br>• Increased symptoms, increased inhaler usage |
| $PM_{10}$ (particulate matter less than 10 microns in aerodynamic diameter) | • See $PM_{2.5}$. | • Premature death & hospitalization, primarily for worsening of respiratory disease |
| Nitrogen Oxides ($NO_X$) | • All combustion sources; especially a by-product of higher temperature combustion. | • Lung irritation<br>• Enhanced allergic responses |
| Carbon Monoxide (CO) | • All combustion sources; especially a by-product of incomplete combustion. | • Chest pain in patients with heart disease<br>• Headache<br>• Light-headedness<br>• Reduced mental alertness |
| Sulfur Oxides ($SO_X$) | • Coal- or oil-burning power plants and industries;<br>• Refineries; and<br>• Diesel-/gasoline-fired engines. | • Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits |
| Lead (Pb) | • Metal smelters;<br>• Resource recovery;<br>• Leaded fuels (esp. aircraft, racing); and<br>• Deterioration of lead-based paint. | • Impaired mental functioning in children<br>• Learning disabilities in children<br>• Brain and kidney damage |
| Hydrogen Sulfide ($H_2S$) | • Landfills and sewer gas;<br>• Geothermal power plants; and<br>• Petroleum production and refining. | • At high concentrations: headache & breathing difficulties |

**TABLE 2**
**SUMMARY OF SOURCES AND HEALTH EFFECTS ASSOCIATED WITH CRITERIA AIR POLLUTANTS**

| Pollutant | Sources | Effects on Health |
|---|---|---|
| Sulfates | • Fully-oxidized, ionic form of sulfur;<br>• See $SO_X$.<br>• $SO_X$ converted to sulfate compounds in the atmosphere. | • Same as $PM_{2.5}$; particularly worsening of asthma and other lung diseases |
| Vinyl Chloride | • Primarily results from microbial breakdown of chlorinated solvents, especially in:<br>o Landfills;<br>o Sewage plants; and<br>o Hazardous waste sites. | • Central nervous system effects, such as dizziness, drowsiness & headaches<br>• Long-term exposure: liver damage and liver cancer |

Source: USEPA 2025

The SCAQMD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment" (SCAQMD 2018). The SCAB is listed as a federal non-attainment area for ozone (1-hour and 8-hour standards) and $PM_{2.5}$, and a state non-attainment area for ozone (1-hour and 8-hour standards), $PM_{10}$ and $PM_{2.5}$. As shown in Table 3, the SCAB is in attainment for the state and federal standards for nitrogen dioxide, carbon monoxide, sulfur dioxide and lead.

**TABLE 3**
**SUMMARY OF SOUTH COAST AIR BASIN (SCAB)**
**FEDERAL AND STATE ATTAINMENT STATUS**

| Criteria Pollutant | Federal Designation | State Designation |
|---|---|---|
| Ozone (8-Hour) | Non-attainment (Extreme) | Non-attainment |
| Ozone (1-Hour) | Non-attainment (Extreme) | Non-attainment |
| Carbon Monoxide | Attainment (Maintenance) | Attainment |
| $PM_{10}$ | Attainment (Maintenance) | Non-attainment |
| $PM_{2.5}$ | Non-Attainment (Serious) | Non-attainment |
| Nitrogen Dioxide (Annual) | Attainment (Maintenance) | Attainment |
| Nitrogen Dioxide (1-Hour) | Unclassifiable/Attainment | Attainment |
| Sulfur Dioxide | Unclassifiable/Attainment | - |
| Lead | Attainment* | - |
| Sulfates | - | Attainment |
| Hydrogen Sulfide | - | Attainment |
| Vinyl Chloride | - | Attainment |

* Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect redesignation to attainment based on current monitoring data.
Source: SCAQMD 2018

#### 2.1.5.2 Toxic Air Contaminants

Toxic air contaminants (TACs) are controlled under a different regulatory process than criteria pollutants. Because no safe level of emissions can be established for TACs region-wide, the regulation of TACs is based on the levels of cancer risk and other health risks posed to persons who may be exposed.

Under federal law, 188 substances are listed as Hazardous Air Pollutants (HAPs) that are TACs. Major sources of specific HAPs are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program. The USEPA establishes regulatory schemes for specific source categories and requires implementation of Maximum Achievable Control Technology (MACT) for major sources of HAPs in each source category.

State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program, and is aimed at HAPs that are a concern in California. The state has formally identified more than 200 substances as TACs and has adopted appropriate control measures for each. Once adopted at the state level, each air district is required to adopt a measure that is equally or more stringent. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act (Assembly Bill 2588 or AB 2588) enacted in 1987 requires certain applicable facilities in the SCAB to quantify the emissions of TACs, and in some cases, conduct a health risk assessment (HRA), and to notify the public, while developing risk reduction strategies. SCAQMD implements AB 2588 requirements through Rule 1402, which includes additional requirements beyond the state law, including a program to encourage facilities to voluntarily reduce risk, and to compel high risk facilities to reduce toxic emissions much more quickly than previously required. Rule 1402 implements the public notification and risk reduction requirements of AB 2588 and requires facilities to reduce risks to acceptable levels within 2 - 2.5 years. In addition, SCAQMD Rule 1402 establishes acceptable risk levels, and emission control requirements for new and modified facilities that may emit TACs.

An example of TAC emissions would be the proposed Project’s generation of diesel exhaust emissions from construction-related vehicles and equipment and operational phases. Diesel exhaust is mainly composed of particulate matter and gases, which contain potential cancer-causing substances in addition to some noncancer hazards. On August 27, 1998, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) identified particulate matter in diesel exhaust as a TAC, based on data linking diesel particulate emissions to increased risks of lung cancer and respiratory disease (CARB 1998).

### 2.1.6 Background Air Quality

The SCAQMD operates a network of air quality monitoring stations throughout the SCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the California and federal standards.

The monitoring station closest to the Project site is the Lake Elsinore-W. Flint Street monitoring station, located at 506 W. Flint Street in Lake Elsinore, approximately 4 miles north-northwest of the Project site. The Lake Elsinore-W. Flint monitoring station did not report state and federal particulate matter concentrations. Therefore, this information was obtained from the nearest station reporting state and federal particulate matter data, the Riverside-Rubidoux station, located at 5888 Mission Boulevard in Riverside approximately 27 miles north-northwest of the Project site.

Table 4 indicates the number of days that each of the federal and state standards have been exceeded at monitoring stations near the Project site in each of the last three years for which data is available. In the vicinity of the Project site, the federal and state 8-hour ozone standards were exceeded each year from 2021 to 2023, and the state worst hour ozone standard was also exceeded each year from 2021 to 2023. In addition, the $PM_{10}$ state standards were exceeded each year and the $PM_{2.5}$ federal and state standards were exceeded each year. Other pollutants are unclassified or in attainment and as such, have not been included in Table 4.

**TABLE 4**
**AMBIENT AIR BACKGROUND POLLUTANT CONCENTRATIONS/EXCEEDANCES/STANDARDS**

| Pollutant | 2021 | 2022 | 2023 |
|---|---|---|---|
| **Ozone ($O_3$)** | | | |
| State maximum 1-hour concentration (ppm) | **0.118** | **0.121** | **0.120** |
| National maximum 8-hour concentration (ppm) | **0.097** | **0.091** | **0.103** |
| State maximum 8-hour concentration (ppm) | **0.098** | **0.092** | **0.103** |
| Number of Days Standard Exceeded | | | |
| CAAQS 1-hour (>0.09 ppm) | 18 | 17 | 10 |
| CAAQS 8-hour (>0.070 ppm)/ NAAQS 8-hour (>0.070 ppm) | 46 / 44 | 37 / 37 | 35 / 31 |
| **Respirable Particulate Matter ($PM_{10}$)** | | | |
| National maximum 24-hour concentration (µg/m$^3$) | 76.5 | **153.6** | **166.5** |
| State maximum 24-hour concentration (µg/m$^3$) | **114.3** | **61.9** | **95.1** |
| State annual average concentration (µg/m$^3$) | **33.2** | **30.0** | **33.0** |
| Annual or Days Standard Exceeded * | | | |
| NAAQS 24-hour (>150 µg/m$^3$) | 0 | 1 | 1 |
| CAAQS 24-hour (>50 µg/m$^3$)/Annual (>20 µg/m$^3$) | 75 / Yes | 5 / Yes | 3 / Yes |
| **Fine Particulate Matter ($PM_{2.5}$)** | | | |
| National Maximum 24-hour concentration (µg/m$^3$) | **82.1** | **38.5** | **74.3** |
| National Annual average concentration (µg/m$^3$) | **13.2** | **10.9** | **11.5** |
| State Annual average concentration (µg/m$^3$) | **13.2** | 10.9 | 11.5 |
| Annual or Days Standard Exceeded * | | | |
| NAAQS 24-hour (>35 µg/m$^3$)/Annual (>9.0 µg/m$^3$) | 11 / Yes | 1 / Yes | 2 / Yes |
| CAAQS Annual (>12 µg/m$^3$) | Yes | No | No |

Notes:
µg/m$^3$ = micrograms per cubic meter; ppb = parts per billion; ppm = parts per million.
CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard.
**BOLD** value indicates greater than standard.
$O_3$, measured at the Lake Elsinore-W Flint Street monitoring station, approximately 4 miles to the North-Northwest
$PM_{10}$, and $PM_{2.5}$ measured at the Rubidoux monitoring station, approximately 27 miles to the North-Northwest
* In the case of an Annual standard a No or Yes response is provided.
Source: CARB 2025

## 2.2 Air Quality Analysis Significance Criteria

The City of Lake Elsinore is within the SCAQMD jurisdiction, which establishes air quality thresholds of significance and methodology guidance defined under CEQA.

SCAQMD is in the process of developing an "Air Quality Analysis Guidance Handbook" to replace the CEQA Air Quality Handbook approved by the SCAQMD Governing Board in 1993. In the meantime, SCAQMD has published supplemental information, such as air quality significance thresholds (SCAQMD 2023b) and localized significance thresholds (SCAQMD 2009), to assist in CEQA air quality analyses.

### 2.2.1 CEQA Air Quality Significance Thresholds

To determine whether a project would result in a significant impact to air quality, Appendix G of the *CEQA Guidelines* requires consideration of whether a project would:

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

A significant adverse air quality impact may occur when a project individually or cumulatively interferes with progress toward the attainment of the ozone standard by generating emissions that equal or exceed the established long-term quantitative thresholds for pollutants or exceed a state or federal ambient air quality standard for any criteria pollutant. If a project is found to have a significant effect, the project would have to incorporate mitigation measures.

### 2.2.2 SCAQMD Air Quality Significance Thresholds

To determine whether a project would (1) conflict with or obstruct implementation of the applicable air quality plan (that is, SCAQMD AQMP), or (2) result in a cumulatively considerable net increase of $PM_{10}$ or $PM_{2.5}$ or exceed quantitative thresholds for ozone precursors (i.e., $NO_X$ and VOCs) or (3) expose sensitive receptors to substantial pollutant concentrations, or (4) result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, project emissions may be evaluated based on the quantitative emission thresholds established by the SCAQMD (SCAQMD 2023b).

For CEQA purposes, these screening criteria can be used as numeric methods to demonstrate that a project's total emissions would not result in a significant impact to air quality. The SCAQMD recommends quantitative regional CEQA significance thresholds for criteria pollutants for temporary construction activities and long-term project operation in the SCAB, in order to maintain or achieve attainment for the criteria pollutants. The significance thresholds are shown in Table 5.

| TABLE 5<br>SCAQMD AIR QUALITY SIGNIFICANCE THRESHOLDS | | |
|---|---|---|
| **Pollutant** | **Construction Threshold (lb/day)** | **Operational Threshold (lb/day)** |
| Respirable Particulate Matter ($PM_{10}$) | 150 | 150 |
| Fine Particulate Matter ($PM_{2.5}$) | 55 | 55 |
| Oxides of Nitrogen ($NO_X$) | 100 | 55 |
| Oxides of Sulfur ($SO_x$) | 150 | 150 |
| Carbon Monoxide (CO) | 550 | 550 |
| Volatile Organic Compounds (VOC)[a] | 75 | 55 |

Source: SCAQMD 2023b

The SCAQMD also sets CEQA significance threshold limits for health risk impacts on sensitive receptors due to emissions of TACs during construction and operation of a project. Sensitive receptors include locations such as residences, schools, hospitals, child daycare centers, and nursing homes where more sensitive individuals in the population could be exposed to a project's emissions, leading to health impacts. To determine impacts to sensitive receptors, if a project emits substantial TAC emissions from construction and/or operations, the health risk impacts at the nearest sensitive receptors are estimated and compared to the SCAQMD CEQA health risk significance thresholds. These CEQA significance thresholds are listed in Table 6.

| TABLE 6<br>SCAQMD REGIONAL CEQA SIGNIFICANCE EMISSIONS THRESHOLDS FOR TOXIC AIR CONTAMINANTS | |
|---|---|
| **Risk Type** | **Significance Threshold** |
| Maximum Incremental Cancer Risk | 10 in one million |
| Chronic or Acute Hazard Index | 1.0 |
| Cancer Burden | 0.5 |

Source: SCAQMD 2023b

The provisions of these regulations do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals. SCAQMD Rule 402 addresses odors as a possible nuisance to people nearby, but it specifically states that the provisions of Rule 402 do not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals. Therefore, any unreasonable odor due to agricultural operations discernible at the property line of sensitive receptors would not be considered a significant odor impact.

In addition to the regional daily thresholds for air pollutants, the SCAQMD has developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook* (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for $NO_X$, CO, $PM_{10}$, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), distance to the sensitive receptor, and project size. LSTs have been developed for emissions in construction areas up to five acres in size. However, LSTs only apply to emissions in a fixed stationary location and are not applicable to mobile sources, such as cars on a roadway (SCAQMD 2008a). As such, LSTs are typically applied only to construction emissions because the majority of operational emissions are associated with project-generated vehicle trips. However, due to the truck traffic and idling emissions that will increase in the area due to the Project, an operational LST analysis is conducted in addition to the construction LST analysis.

SCAQMD provides LST lookup tables for project sites that measure one, two, or five acres. If a site is greater than five acres, SCAQMD recommends a dispersion analysis be performed. Lot acreage for the Project is approximately 2.88 acres; therefore, this analysis determines an applicable LST based on the project site area and the LST lookup values for two-acre construction sites. LSTs are provided for receptors at a distance of 25 to 500 meters (82 to 1,640 feet) from the project disturbance boundary to the sensitive receptors. Construction activity would occur approximately 109 feet (33.2 meters) west of the closest sensitive receptors, an existing single-family residence. The analysis below uses the LST values for 25 meters which is the closest LST distance to 33.2 meters. In addition, the Project is located in SRA-25 (Lake Elsinore). LSTs for construction and operation in SRA-25 on a 2-acre site with a receptor 25 meters away are shown in Table 7.

**TABLE 7**
**SCAQMD LST FOR CONSTRUCTION AND OPERATION**
**(SRA-25)**

| Pollutant | Allowable Emissions (Construction) (lb/day) | Allowable Emissions (Operation) (lb/day) |
|---|---|---|
| Gradual Conversion of $NO_X$ to $NO_2$ | 234 | 234 |
| Carbon Monoxide (CO) | 1,100 | 1,100 |
| Respirable Particulate Matter ($PM_{10}$) | 7 | 2 |
| Fine Particulate Matter ($PM_{2.5}$) | 4 | 1 |

Source: SCAQMD 2009 for a 2-acre project site in Source Receptor Area 25 (Lake Elsinore) at a receptor distance of 25 m.

## 2.3 Air Quality Analysis Methodology

Air quality modeling for the Project development was performed to identify construction and operational emissions associated with the Project. Criteria pollutant emissions were calculated using the California Emissions Estimator Model (CalEEMod) software version 2022.1.1.32 which incorporates current air emission data, planning methods and protocols approved by CARB (CAPCOA 2022).

As referenced, construction activities would include site preparation, grading, construction of the buildings/utilities and related improvements as well as paving parking areas. Construction activities would require the use of equipment that would generate criteria air pollutant emissions. For modeling purposes, it was assumed that all construction equipment would be Tier 4 Interim diesel-powered. Construction emissions associated with the development of the Project site were calculated based on default equipment amounts and types. There is currently no building on the parcel, so no demolition activities are included. Construction emissions were analyzed using the regional and localized thresholds published by the SCAQMD (SCAQMD 2023b and 2009).

Operational emissions from the Project would include mobile source emissions, energy emissions and area source emissions. Mobile source emissions would be generated by motor vehicle trips associated with operation of the Project site. Emissions attributable to energy use include natural gas consumption for space and water heating. Area source emissions would be generated by landscape maintenance equipment, use of consumer products and painting. To determine whether a regional air quality impact would occur from this development, the increases in emissions were compared with the operational thresholds published by the SCAQMD (SCAQMD 2023b).

### 2.3.1 Construction Emissions

Construction of the development would generate temporary air pollutant emissions. These impacts are associated with fugitive dust ($PM_{10}$ and $PM_{2.5}$) from soil disturbance and exhaust emissions ($NO_x$, CO, and $SO_2$) from heavy construction vehicles. As noted, construction would generally consist of site preparation and lot grading, construction of the buildings and related improvements, paving and the application of architectural coating (painting).

Table 8 shows the construction schedule assumed for each of the construction phases at the site. A five-day workweek was assumed with no overlap between the construction phases, except for the paving and architectural coating phases at the end of the construction phase. Default values were assumed for the number of construction equipment for each construction phase. Per the client, all construction equipment was modeled as Tier 4 interim.

| TABLE 8<br>CONSTRUCTION SCHEDULE – CORYDON WAREHOUSE DEVELOPMENT | |
|---|---|
| **Construction Phase** | **Estimated Dates** |
| Site Preparation | December 2, 2025 – January 3, 2026 |
| Grading | January 6, 2026 – March 7, 2026 |
| Building Construction | March 10, 2026 – December 5, 2026 |
| Paving/Architectural Coating | December 8, 2026 – January 2, 2027 |

Site preparation and grading would involve the greatest concentration of heavy equipment use and the highest potential for fugitive dust emissions. It was assumed that 4,776 cy of soil would be imported for grading purposes. Any development would be required to comply with SCAQMD Rule 403, which identifies fugitive dust standards and is required to be implemented at all construction sites located within the SCAB. Therefore, the following assumptions 1 through 5, which generally reduce fugitive dust emissions, were included in CalEEMod for site preparation and grading phases of construction. Assumption 6 was included in CalEEMod for the architectural coating phase of construction.

1. **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.

2. **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least three times daily, preferably at the start of each morning, mid-day, and after work is completed for the day. For modeling purposes, it was assumed that watering would occur three times daily, during the construction of this development.

3. **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

4. **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of

high winds.

5. **Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

6. **Architectural Coatings.** Construction contractors shall use low-VOC paint (50 g/L for interior and exterior coatings for residential and non-residential buildings, and 100 g/L for parking lot paint) as required by SCAQMD Rule 1113. It was assumed that 10% of exterior building surfaces would be painted, since the exterior will be unpainted cement blocks.

### 2.3.2 Operational Emissions

Operational emissions for the Project include emissions from natural gas consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment, and evaporative emissions as the structures are repainted over the life of developments at the Project site. The majority of operational emissions would be associated with vehicle trips to and from the development. Eighty-three (83) Average daily trips (ADTs) from the from the Vehicle Miles Traveled (VMT) screening letter (OTC 2025) were used in the CalEEMod modeling. The first year of operations for the Project will likely be in 2027.

The CalEEMod modeling for operational emissions considered the design conditions listed below:

1. **Architectural coatings.** The use of low-VOC paint (50 g/L for interior and exterior coatings and 100 g/L for parking lot paint) as required by SCAQMD Rule 1113.

2. **Fireplaces and Woodstoves**. No fireplaces or woodstoves would be installed.

3. **Refrigerants**. No refrigerants because these are unrefrigerated warehouses.

4. **Operational Equipment**. The skip loader, front loader, skid steer loader, forklift, and water truck will all be Tier 4 Final diesel-fueled equipment.

## 2.4 Air Quality Analysis Results

The Project would generate both construction and operational emissions. Initial construction emissions would include emissions associated with the site development and grading of the site. Operational emissions would include emissions from truck and vehicle traffic. The construction and operational impacts are evaluated and compared to significance criteria in this section.

### 2.4.1 Consistency with Air Quality Plans and Standards

***Will the project conflict with or obstruct implementation of the applicable air quality plan?***

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. With regard to air quality planning, SCAG has prepared the Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS), a long-range transportation plan that uses growth forecasts to project trends for regional population, housing and employment growth out to 2050 to identify regional transportation strategies to address mobility needs. These growth forecasts form the basis for the land use and transportation control portions of the 2022 AQMP.

The updated growth forecasts in SCAG's 2024 RTP/SCS estimate that the employment numbers in Lake Elsinore would be 22,700 in 2050, from an employment number of 16,700 in 2019 (SCAG 2024). Based on the anticipated employee count for the operation of the warehouse Project, there will be approximately 13 employees. This would amount to an approximately 0.1 percent increase compared to 2019 employment in the city. The anticipated increase in employment would be within the SCAG's projected 2050 employment increase of 6,000 from 2019 and the Project would not cause Lake Elsinore to exceed official regional growth projections.

In addition, the AQMP provides strategies and measures to reach attainment with the thresholds for 8-hour and 1-hour ozone and $PM_{2.5}$. As shown in the tables in this section, the Project would not generate criteria pollutant emissions that would exceed SCAQMD thresholds for ozone precursors (VOC and $NO_X$) and $PM_{2.5}$.

Given the aforementioned, the Project would be consistent with the AQMP and would have a less than significant impact. Therefore, the proposed Project would not conflict or obstruct implementation of the air quality plans, and impacts are **less-than-significant** in this regard.

### 2.4.2 Cumulative Impacts

***Will the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?***

Pursuant to CEQA Guidelines Section 15064(h)(3), the SCAQMD's approach for assessing cumulative impacts is based on the AQMP forecasts of attainment of ambient air quality standards in accordance with the requirements of the federal and state Clean Air Acts. If the project's mass regional emissions do not exceed the applicable SCAQMD thresholds, then the project's criteria pollutant emissions would not be cumulatively considerable. As demonstrated in the tables in this section, the Project's regional emissions do not exceed the SCAQMD thresholds. Therefore, the cumulative impacts are **less than significant**.

### 2.4.3 Construction Emissions Impacts

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust ($PM_{10}$ and $PM_{2.5}$) from soil disturbance and exhaust emissions ($NO_X$ and CO) from heavy construction vehicles. For the purpose of estimating emissions, it was assumed that 2.88 acres will be graded and developed for overall construction. As noted, construction would generally consist of site preparation and grading, construction of the buildings and related improvements, paving of the parking lot and the application of architectural coating (painting).

Table 9 summarizes the estimated maximum daily emissions of pollutants associated with construction of the proposed Project. As shown below, VOC, $NO_X$, CO, $SO_2$, $PM_{10}$, and $PM_{2.5}$ emissions would not exceed SCAQMD regional thresholds. The CalEEMod emission estimates and assumptions for operations are included in Appendix B.

**TABLE 9**
**ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS**

| | Maximum Emissions (lbs/day) | | | | | |
|---|---|---|---|---|---|---|
| **Construction Year** | **VOC** | **$NO_X$** | **CO** | **$SO_2$** | **$PM_{10}$** | **$PM_{2.5}$** |
| 2025 Maximum Day | 0.74 | 16.0 | 31.0 | 0.050 | 1.13 | 0.24 |
| 2026 Maximum Day | 10.6 | 19.1 | 30.9 | 0.050 | 4.30 | 2.02 |
| 2027 Maximum Day | 10.6 | 14.0 | 20.3 | 0.027 | 0.67 | 0.31 |
| SCAQMD Regional Thresholds | *75* | *100* | *550* | *150* | *150* | *55* |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** | **No** | **No** |

See *Appendix B for CalEEMod ver. 2022.1.1.32 computer model output for the construction emission estimates for the proposed development; the higher value of summer or winter, are shown.*

Table 10 summarizes the maximum daily on-site emissions of pollutants associated with construction of the proposed Project. As shown below, $NO_X$, CO, $PM_{10}$, and $PM_{2.5}$ emissions would not exceed SCAQMD LSTs.

| TABLE 10<br>ESTIMATED MAXIMUM ON-SITE DAILY CONSTRUCTION EMISSIONS | | | | |
|---|---|---|---|---|
| | **Maximum Emissions (lbs/day)** | | | |
| **Construction** | **$NO_X$** | **CO** | **$PM_{10}$** | **$PM_{2.5}$** |
| Maximum On-Site Emissions | 18.8 | 30.1 | 3.78 | 1.87 |
| SCAQMD LSTs | *234* | *1,100* | *7* | *4* |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** |

*See Appendix B for CalEEMod ver. 2022.1.1.32 computer model output for the construction emission estimates for the proposed development; the higher value of summer or winter, are shown.*

As shown in Tables 9 and 10, criteria pollutant emissions would not exceed SCAQMD regional thresholds or LSTs. Because the Project would not exceed SCAQMD's regional construction thresholds or LSTs, Project construction would not result in a cumulatively considerable net increase of a criteria pollutant and impacts would be less than significant. As such, air quality impacts from Project-related construction activities would be **less than significant**. Because maximum $NO_x$ and VOC emissions from construction would not exceed the SCAQMD CEQA significance thresholds, the impacts from these non-attainment pollutants are not expected to have a cumulatively considerable net increase, and therefore, **less than significant**.

### 2.4.4 Operational Emissions Impacts

Operational emissions associated with the two warehouse buildings include emissions from natural gas consumption (energy sources), vehicle trips (mobile sources), area sources, landscape equipment and evaporative emissions as the structures are repainted over the life of the Project. The majority of operational emissions are associated with vehicle trips to and from the Project site. Table 11 summarizes the maximum daily regional emissions of pollutants associated with operation of the proposed Project.

The CalEEMod emission estimates and assumptions for operations are included in Appendix B.

| TABLE 11<br>ESTIMATED OPERATIONAL EMISSIONS | | | | | | |
|---|---|---|---|---|---|---|
| | **Maximum Daily Emissions (lbs/day)** | | | | | |
| | **VOC** | **$NO_X$** | **CO** | **$SO_2$** | **$PM_{10}$** | **$PM_{2.5}$** |
| ***Proposed Project*** | | | | | | |
| Mobile | 0.37 | 0.48 | 4.38 | 0.01 | 1.08 | 0.28 |
| Area | 1.10 | 0 | 0 | 0 | 0 | 0 |
| Energy | 0.01 | 0.25 | 0.21 | <0.005 | 0.02 | 0.02 |
| Off-Road | 0.28 | 2.50 | 16.4 | 0.03 | 0.05 | 0.05 |
| **Daily Total** | **1.76** | **3.23** | **21.0** | **0.04** | **1.15** | **0.35** |
| SCAQMD Regional Thresholds | *55* | *55* | *550* | *150* | *150* | *55* |
| **Exceeds Threshold?** | **No** | **No** | **No** | **No** | **No** | **No** |

*See Appendix B for CalEEMod ver. 2022.1.1.32 computer model output; the higher value of summer or winter, daily emissions are shown.*

Table 12 summarizes the maximum daily on-site emissions of pollutants associated with operation of the proposed Project. As CalEEMod does not separate onsite and offsite emissions, all operational emissions were conservatively assumed to be onsite. As shown below, $NO_X$, CO, $PM_{10}$, and $PM_{2.5}$ emissions would not exceed SCAQMD LSTs.

| TABLE 12<br>ESTIMATED MAXIMUM ON-SITE DAILY OPERATIONAL EMISSIONS | | | | |
|---|---|---|---|---|
| | **Maximum Emissions (lbs/day)** | | | |
| **Operations** | **$NO_X$** | **CO** | **$PM_{10}$** | **$PM_{2.5}$** |
| Maximum On-Site Emissions | 3.23 | 23.1 | 1.15 | 0.35 |
| SCAQMD LSTs | *234* | *1,100* | *2* | *1* |
| **Threshold Exceeded?** | **No** | **No** | **No** | **No** |

See *Appendix B for CalEEMod ver. 2022.1.1.32 computer model output for the construction emission estimates for the proposed development; the higher value of summer or winter, are shown.*

As shown in Tables 11 and 12, the emissions associated with operation of the Project would not exceed the SCAQMD regional thresholds or LSTs. Therefore, the Project's regional and local air quality impacts (including impacts related to criteria pollutants, sensitive receptors and violations of air quality standards) would be **less than significant**. Because maximum $NO_x$ and VOC emissions from operations would not exceed the SCAQMD CEQA significance thresholds, the impacts from these non-

attainment pollutants are not expected to have a cumulatively considerable net increase, and therefore would be **less than significant**.

## 2.5 Sensitive Receptor Exposure

***Will the project expose sensitive receptors to substantial pollutant concentrations?***

### 2.5.1 Toxic Air Contaminants

The proposed Project does not propose specific stationary sources that would generate TACs, which are not commonly associated with warehouse development projects. If stationary sources with the potential to emit TACs were to be included as part of the Project, or included at a later date, those sources would be subject to SCAQMD Rule 1401 and would be subject to New Source Review requirements.

Construction-related activities would result in temporary Project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation, grading, building construction, and other construction activities. DPM was identified as a TAC by CARB in 1998. Due to the short-term construction duration, the limited construction emissions, and the mostly industrial and residential land use surrounding the Project site, there is very low potential for fugitive dust or DPM to impact sensitive receptors during construction. The total Project construction DPM emissions are not of a magnitude and duration that could create significant air toxic risks to the nearest receptors during construction. Compliance with the SCAQMD rules and regulations would reduce the fugitive dust emissions during Project construction and associated impacts to sensitive receptors. The proposed Project's operating emissions would be negligible and would not have the potential to impact sensitive receptors. Therefore, the Project's construction and operation air pollutant emissions would not expose sensitive receptors to substantial pollutant concentrations and would result in a **less than significant** impact.

### 2.5.2 Local Carbon Monoxide Emissions and CO Hotspots

The proposed Project would result in CO emissions of approximately 21.0 pounds per day, well below the 550 pounds per day threshold. Based on the low background level of CO in the Project area, improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the Project's low level of operational CO emissions, the Project would not create new hotspots or contribute substantially to existing hotspots, and impacts would be **less than significant**.

## 2.6 Objectionable Odors

***Will the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

For construction activities, odors would be temporary in nature and are subject to SCAQMD Rule 402, Nuisance. Construction activities would be temporary and transitory and associated odors would cease upon construction completion. Accordingly, the proposed Project would not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be **less than significant**.

Common sources of operational odor complaints include sewage treatment plants, landfills, recycling facilities, and agricultural uses. The proposed Project, two warehouse buildings, would not include any of these uses. Solid waste generated by the proposed on-site uses would be stored on-site in two enclosed trash areas and collected by a municipal or contracted waste hauler, thereby managing and collecting on-site waste in a manner to prevent the proliferation of odors. Operational odor impacts would be **less than significant**.

## 3.0 GREENHOUSE GAS STUDY

A greenhouse gas (GHG) analysis was performed to evaluate potential environmental impacts associated with the emissions of GHGs and the effects of global climate change with the proposed Project. This study analyzes the potential for climate change impacts associated with construction activity and operation of the proposed Project.

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). 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 climate change include carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxides ($N_2O$), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride ($SF_6$). California Health and Safety Code Section 38505(g) defines GHGs to include the following compounds: $CO_2$, $CH_4$, $N_2O$, chlorofluorocarbons (CFCs), HFCs, and $SF_6$.

Based upon the CARB California Greenhouse Gas Inventory, 2024 edition, (CARB 2024b), California produced 371.1 million metric tons (MMT) $CO_2$ equivalent ($CO_2e$) in 2022. The major source of GHGs in California is transportation, contributing 39 percent of the state's total GHG emissions. The industrial sector is the second largest source, contributing 23 percent of the state's GHG emissions (CARB 2024b).

The City of Lake Elsinore's Climate Action Plan (CAP) contains the GHG emissions inventory and forecasts for both community-wide activities, including municipal operations. The City is currently updating the CAP, but the latest version was adopted in December 2011. In this latest version, GHG emissions in 2008 for community-wide activities were estimated at 506,727 metric tons (MT) $CO_2e$. The majority of community-wide activities emissions were associated with on-road transportation (60.6 percent), followed by energy consumed in residential, commercial, and industrial buildings (32.4 percent). Municipal operations emissions constituted 0.9 percent of the community's total emissions (City of Lake Elsinore 2011).

## 3.1 GHG Regulatory Setting

### 3.1.1 Federal GHG Regulations

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address global climate change. The federal government's early efforts have focused on public-private partnerships to reduce GHG intensity through energy efficiency, renewable energy, methane and other non-$CO_2$ gases, agricultural practices, and implementation of technologies to achieve GHG reductions.

The USEPA is required to regulate carbon dioxide and other GHGs as pollutants under Section 202(a)(1) of the federal Clean Air Act. The first step in implementing its authority was the Mandatory Reporting Rule that required inventory data collection commencing on January 1, 2010 with first reports due March 2011. Effective January 2, 2011, the USEPA required new and existing sources of GHG emissions of 75,000 tons per year to obtain a permit under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit Program.

The main federal regulatory program for automobiles is the Corporate Average Fuel Economy (CAFE) program, which has been in place since 1975. Under previous administrations, CAFE was the primary means of limiting mobile source carbon emissions. Rules finalized in 2012 put in place binding standards through Model Year 2021 and offered estimated standards through 2024. The federal light-duty vehicle standards were developed in two phases that harmonized with California standards through 2016 (Phase 1) and 2025 (Phase 2) and developed the first ever federal GHG standards for medium-duty and heavy-duty vehicles. At the time, the USEPA estimated that the new standards in this rule would reduce $CO_2$ emissions by approximately 270 MMT and save 530 million barrels of oil over the life of vehicles sold during the 2014 through 2018 model years.

On March 20, 2024, the USEPA issued the Final Rule titled *"Multi-Pollutant Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles"* (USEPA 2024). It defines stricter limits on greenhouse gases and tailpipe pollutants ($NO_x$, $PM_{2.5}$, NMOG) for model years 2027–2032. As of November 2025, the current USEPA leadership has initiated a rollback process under the Administrative Procedure Act, targeting the vehicle emissions and fuel economy rules set in 2024.

### 3.1.2 California GHG Regulations

Executive Orders (EO) S-3-05 and B-30-15 are orders from the State's Executive Branch for the purpose of reducing GHG emissions. Executive Order S-3-05's goal to reduce GHG emissions to 1990 levels by 2020 was adopted by the Legislature as the 2006 Global Warming Solutions Act (AB 32) and codified into law in Health and Safety Code (HSC) Division 25.5. Executive Order B30-15's goal to reduce GHG emissions to 40 percent below 1990 levels by 2030 was adopted by the Legislature in SB 32 and also codified into law in HSC Division 25.5. In September 2022, AB 1279, The

California Crisis Act, was approved and codified the carbon neutrality target as 85 percent below 1990 levels by 2045 (California Crisis Act 2022).

In support of HSC Division 25.5, the State has promulgated specific laws and strategies aimed at GHG reductions applicable to the Project. The primary focus of many of the statewide and regional plans, policies and regulations is to address worldwide climate change. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the Project alone would not likely cause a direct physical change in the environment. It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

AB 32 requires CARB to prepare a Scoping Plan that outlines the main state strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. After completing a comprehensive review and update process, CARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT $CO_2e$. The Scoping Plan was approved by CARB on December 11, 2008, and updated on November 16, 2022, and includes measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures (CARB 2022b). The Scoping Plan includes a range of GHG reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms. Executive Order S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard (LCFS) for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020. CARB's Scoping Plan builds on this 2020 goal by listing strategies that will further reduce California's reliance on carbon fuels by 2030.

Senate Bill 97 (SB 97) was adopted August 2007 and acknowledges that climate change is an environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify and adopt those guidelines by January 1, 2010. Pursuant to the requirements of SB 97 as stated above, on December 30, 2009 the Natural Resources Agency adopted amendments to the state CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided and no specific mitigation measures were identified. The

GHG emission reduction amendments went into effect on March 18, 2010 and are summarized below:

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.

- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.

- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies or recommended by experts.

- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in *Appendix F: Energy Conservation* of the CEQA Guidelines.

- OPR emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.

- Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

Senate Bill 1078 (SB 1078) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. Senate Bill 107 (SB 107) changed the target date to 2010. Executive Order S-14-08 was signed on November 2008 and expands the state's Renewable Energy Standard to 33 percent renewable energy by 2020. Executive Order S-21-09 directed CARB to adopt regulations by July 31, 2010 to enforce S-14-08. Senate Bill X1-2 codifies the 33 percent renewable energy requirement by 2020.

California Code of Regulations (CCR) Title 24, Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24) were first established 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 efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil

fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

The Energy Commission adopted 2008 Standards on April 23, 2008 and Building Standards Commission approved them for publication on September 11, 2008. These updates became effective on August 1, 2009. The California Energy Commission updates the Building Energy Efficiency Standards every three years. The 2022 Building Energy Efficiency Standards apply to new construction of, and additions and alterations to, residential and nonresidential buildings and have been incorporated into the most recent CalEEMod model. All buildings for which an application for a building permit is submitted on or after January 1, 2023 must comply with the 2022 standards. The 2022 commercial standards are more efficient than the 2019 standards and include increased space and water heating efficiency and ventilation standards. Energy efficient buildings require less electricity; therefore, increased energy efficiency reduces fossil fuel consumption and decreases greenhouse gas emissions.

27 CCR Title 24, Part 11: California Green Building Standards (Title 24) became effective in 2001 in response to continued efforts to reduce GHG emissions associated with energy consumption. CCR Title 24, Part 11, also known as CALGreen, now requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. One focus of CALGreen is water conservation measures, which reduce GHG emissions by reducing electrical consumption associated with pumping and treating water. CALGreen has approximately 52 nonresidential mandatory measures and an additional 130 provisions for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use within buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

Senate Bill 375 (SB 375) was adopted in September 2008 and aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable community's strategy (SCS) or alternate planning strategy (APS) that will prescribe land use allocation in that MPO's Regional Transportation Plan (RTP). CARB, in consultation with each MPO, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's sustainable community's strategy or alternate planning strategy for consistency with its assigned targets.

Senate Bill X7-7 (SB X7-7), enacted on November 9, 2009, mandates water conservation targets and efficiency improvements for urban and agricultural water suppliers. SB X7-7 requires the Department of Water Resources (DWR) to develop a task force and technical panel to develop alternative best management practices for the water sector. Additionally, SB X7-7 required the DWR to develop criteria for baseline uses for residential, commercial, and industrial uses for both indoor and landscaped area uses. The DWR was also required to develop targets and regulations that achieve a statewide 20 percent reduction in water usage.

On April 29, 2015, Governor Brown issued Executive Order B-30-15 to establish a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030 - the most aggressive benchmark enacted by any government in North America to reduce dangerous carbon emissions over the next decade and a half. This executive action set the stage for the important work being done on climate change by the Legislature. The Governor's executive order aligns California's GHG reduction targets with those of leading international governments.

California has met or exceeded the current target of reducing GHG emissions to 1990 levels by 2020, as established in the California Global Warming Solutions Act of 2006 (AB 32). California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal of reducing emissions 85 percent from 1990 levels by 2045.

SB 32 and AB 197 (enacted in 2016) are companion bills that set new statewide GHG reduction targets, make changes to CARB's membership, increase legislative oversight of CARB's climate change–based activities and expand dissemination of GHG and other air quality–related emissions data to enhance transparency and accountability. More specifically, SB 32 codified the 2030 emissions reduction goal of EO B-30-15 by requiring CARB to ensure that statewide GHG emissions are reduced to 40% below 1990 levels by 2030. AB 197 established the Joint Legislative Committee on Climate Change Policies which is comprised of at least three members of the Senate and three members of the Assembly that provide ongoing oversight over implementation of the state's climate policies. AB 197 added two members of the Legislature to CARB as nonvoting members; requires CARB to make available and update (at least annually via its website) emissions data for GHGs, criteria air pollutants, and toxic air contaminants from reporting facilities; and requires CARB to identify specific information for GHG emissions reduction measures when updating the Scoping Plan.

SB 100, the 100 Percent Clean Energy Act of 2018, was passed in late 2018. SB 100 calls for the 100 percent of total retail sales of electricity in California to originate from eligible renewable energy resources and zero-carbon resources by December 31, 2045. SB 1020, the Clean Energy, Jobs, and Affordability Act of 2022, was passed in September 2022. SB 1020 revises SB 100 to instead provide that eligible renewable energy resources and zero-carbon resources supply 90% of all retail sales of electricity to California end-use customers by December 31, 2035, 95% of all retail sales of electricity to customers by December 31, 2040, 100% of retail sales of

electricity to customers by December 31, 2045, and 100% of electricity procured to serve all state agencies by December 31, 2035. The intention was to extend and expand policies of the California Renewables Portfolio Standard (RPS) Program (Article 16 (commencing with Section 399.11) of Chapter 2.3 of Part 1 of Division 1 of the Public Utilities Code), and to codify the policies established pursuant to Section 454.53 or the Public Utilities Code, and that both be included in long-term planning. A benefit seen by the legislator of SB 100 and SB 1020 includes meeting the state's climate change goals by reducing emissions of GHGs associated with electrical generation (CEC 2021).

The Zero Emission Vehicle (ZEV) and Low Emission Vehicle (LEV) programs of California's Advanced Clean Cars (ACC) regulations, originally enacted in 2012 for model years 2015 to 2025 for light-duty and medium-duty vehicles, have been effective policies for creating and growing the market for electric vehicles and reducing road transport greenhouse gas and criteria pollutant emission. California adopted the new Advanced Clean Cars II regulations (ACC II) in August 2022. The ACC II sets annual ZEV and plug-in hybrid vehicle (PHEV) sales requirements from model years 2026 to 2035 (ZEV program) and increasingly more stringent exhaust and evaporative emission standards (LEV program) to ensure automakers gradually phase out new sales of internal combustion engine vehicles. However, on May 22, 2025, the U.S. Congress passed the Congressional Review Act resolution that reverses the ACC and ACC II, and they are no longer effective.

On September 16, 2022, Governor Newsom approved AB 1279, the California Climate Crisis Act and SB 1020, the Clean Energy, Jobs, and Affordability Act. AB 1279 codified the carbon neutrality target as 85 percent below 1990 levels by 2045. SB 1020 requires CARB to prepare and approve a scoping plan and to update the scoping plan at least once every 5 years. CARB approved the 2022 Scoping Plan to Achieve Carbon Neutrality (2022 Scoping Plan) for achieving carbon neutrality in December 2022. The 2022 Scoping Plan identifies strategies for achieving the states' GHG emission reduction targets and calls for measures such as all new commercial buildings to have all electric appliances by 2029 (CARB 2022b).

### 3.1.3 Local GHG Regulations and CEQA Requirements

*Southern California Association of Governments: RTP/SCS*

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California regarding compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated MPO for the six-county Southern California region, SCAG is required by law to develop transportation activities that conform to, and are supportive of, the goals of regional and state air quality plans to attain NAAQS.

In addition, SCAG is a co-producer with the SCAQMD of the transportation strategy and transportation control measure sections of the AQMP for the Basin. With regard to future growth, SCAG adopted the 2024 RTP/SCS in April 2024, which provides population, housing, and employment projections for cities under its jurisdiction (SCAG 2024). The growth projections in the 2024 RTP/SCS are based in part on projections originating under county and city general plans. Previous growth projections were utilized in the preparation of the air quality forecasts and consistency analysis included in the 2022 AQMP.

*City of Lake Elsinore Climate Action Plan*

Adopted in December 13, 2011, the City of Lake Elsinore's Climate Action Plan (CAP) is a long-range plan to reduce local greenhouse gas emissions that contribute to climate change (City of Lake Elsinore 2011). The CAP includes an inventory of existing GHG emissions and projects future emissions trends. The CAP also describes local GHG emissions targets for the years 2020 and 2030, and strategies and measures to achieve the targets.

### 3.1.4 Project Specific Guidelines and GHG Thresholds of Significance

On December 5, 2008 the SCAQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.) of 10,000 Metric Tons (MT) $CO_2$ equivalent/year $CO_2e$. In September 2010, the SCAQMD CEQA Significance Thresholds GHG Working Group released revisions which recommended a threshold of 3,000 MT $CO_2e$ for all land use projects. This 3,000 MT/year recommendation has been used as a numerical guideline for this analysis.

Based on Appendix G of the *CEQA Guidelines*, impacts related to GHG emissions from the Project would be significant if the Project would:

1. *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.*

2. *Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.*

For purposes of this analysis, the two Appendix G checklist questions set forth above are utilized as the thresholds of significance when evaluating the environmental effects of the Project's GHG emissions.

In addition, *CEQA Guidelines* Section 15064.4(b) states that a lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;

- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions.

The City's CAP establishes quantitative targets 6.6 MT $CO_2e$ per service population by 2020 and 4.4 MT $CO_2e$ per service population by 2030. Service population is the total number of employees generated by a project. The CAP further demonstrates that these targets are sufficient to achieve GHG reduction targets set by AB 32 (1990 levels by 2020) and Executive Order S-3-05 (80 percent below 1990 levels by 2050). However, the City's CAP pre-dates passage of SB 32, which calls for a 40 percent reduction of GHG emissions below 1990 levels by 2030. While the City's CAP establishes a 2030 target of 4.4 MT $CO_2e$ per service population, this target was established based on a linear trajectory of emissions reduction from 1990 levels in 2020 to 80 percent reduction below such levels in 2050. Under this trajectory, a 40 percent reduction of emissions from 1990 levels would not occur until 2035 and, consequently, this 2030 target is not sufficient to demonstrate compliance with SB 32.

Nevertheless, the City's CAP states that it is intended to "serve as the programmatic tiering document for the purposes of CEQA within the City of Lake Elsinore for GHG emissions, by which applicable projects will be reviewed. If a proposed development project can demonstrate it is consistent with the applicable emissions reduction measures included in the CAP, the programs and standards that would be implemented as a result of the CAP, the General Plan Update growth projections, the project's environmental review pertaining to GHG impacts may be streamlined as allowed by CEQA Guidelines Sections 15152 and 15183.5" (City of Lake Elsinore 2011). Given that the City's CAP was adopted for the purposes of determining impact significance for CEQA purposes and that the role of land use strategies in achieving the reductions set forth by SB 32 remains unclear, this analysis determines the significance of GHG impacts based on consistency with the City's CAP and other applicable plans and policies intended to reduce GHG emissions.

CEQA Guidelines Section 15064.4(a) states that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project. Therefore, GHG emissions as estimated by CalEEMod are provided for informational purposes.

## 3.2 Greenhouse Gas Analysis Methodology

GHG emissions associated with construction and operation of the proposed Project and existing development have been estimated using California Emissions Estimator Model (CalEEMod) version 2022.1.1.32 (CAPCOA 2022).

### 3.2.1 Construction GHG Emissions Calculation Methodology

Construction of the proposed Project would generate temporary GHG emissions primarily associated with the operation of construction equipment and truck trips. Site preparation and grading typically generate the greatest emission quantities because the use of heavy equipment is greatest during this phase of construction. Emissions associated with the construction period were estimated based on the projected maximum amount of equipment that would be used onsite at one time. Pursuant to SCAQMD Guidance, total construction GHG emissions, resulting from the Project, are amortized over 30 years and added to operational GHG emissions (SCAQMD 2008b). Complete CalEEMod GHG modeling for construction, results and assumptions are included in Appendix B.

### 3.2.2 Operational GHG Emissions Calculation Methodology

Default values used in CalEEMod version 2022.1.1.32 are based on the California Energy Commission (CEC) sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies. CalEEMod provides operational emissions of $CO_2$, $N_2O$ and $CH_4$. This methodology has been subjected to peer review by numerous public and private stakeholders, and in particular by the CEC; and therefore, is considered reasonable and reliable for use in GHG impact analysis pursuant to CEQA.

Emissions associated with area sources (i.e., consumer products, landscape maintenance, and architectural coating) were calculated in CalEEMod based on standard emission rates from CARB, USEPA, and district supplied emission factor values. Emissions from waste generation were also calculated in CalEEMod and are based on the Intergovernmental Panel on Climate Change's (IPCC's) methods for quantifying GHG emissions from solid waste using the degradable organic content of waste. Emissions from water and wastewater usage calculated in CalEEMod were based on the default electricity intensity from a study published by The Pacific Institute (Sziniai et. al. 2021) using the average values for Northern and Southern California. Emissions from mobile sources were quantified based on trip generation estimates included in CalEEMod.

## 3.3 Estimate of GHG Emissions

### 3.3.1 Construction GHG Emissions

Construction activity is assumed to occur over a period of 13 months beginning in December 2025 and concluding in January 2027. Based on CalEEMod results, construction activity for the Project would generate an estimated 644 metric tons of $CO_2e$, as shown in Table 13. Amortized over a 30-year period (the assumed life of the Project), construction of the proposed Project would generate 21.5 metric tons of $CO_2e$ per year.

| **TABLE 13<br>CONSTRUCTION GREENHOUSE GAS EMISSIONS** | |
|---|---|
| **Year** | **Annual Emissions (Metric tons $CO_2e$)** |
| 2025 | 54.9 |
| 2026 | 587 |
| 2027 | 2.07 |
| **Total Construction Emissions** | **644** |
| **Amortized over 30 years** | **21.5** |

*See Appendix B for annual CalEEMod emission results files.*

### 3.3.2 Operational GHG Emissions

Operational GHG emissions are long-term emissions related to energy use, solid waste, water use, and transportation. Each source is discussed below and includes the emissions associated with existing development and the anticipated emissions that would result from the proposed Project.

*Mobile Source Emissions*

Mobile source GHG emissions were estimated using the average daily trips from the Vehicle Miles Traveled (VMT) screening letter (OTC 2025). The screening letter states that the Project would generate 83 daily trips. The Project would generate approximately 195 metric tons of $CO_2e$ associated with new vehicle trips.

*Area Emissions*

Emissions from landscaping equipment, architectural coatings, and household consumer products are considered area sources. Estimated annual GHG emissions from area sources for the Project would be less than 1 MT $CO_2e$.

*Energy Use*

Operation of onsite development would consume both electricity and natural gas (see Appendix B for CalEEMod results). The generation of electricity through combustion of fossil fuels typically yields $CO_2$, and to a smaller extent, $N_2O$ and $CH_4$. Natural gas emissions can be calculated using default values from the CEC sponsored CEUS and RASS studies which are built into CalEEMod. The overall energy use at the Project site would result in approximately 115 metric tons of $CO_2e$ per year.

*Water Use Emissions*

The CalEEMod results indicate that the Project would use approximately 11.6 million gallons of water per year. Based on the amount of electricity generated to supply and convey this amount of water, the Project would generate approximately 34.3 metric tons of $CO_2e$ per year.

*Solid Waste Emissions*

For solid waste generated onsite, the CalEEMod results indicate that the Project would result in approximately 14.3 metric tons of $CO_2e$ per year associated with solid waste disposed within landfills.

*Off-Road Emissions*

Emissions from operation of off-road equipment onsite such loaders, skid steers, forklifts, and water trucks were estimated using CalEEMod assuming all equipment uses Tier 4 diesel; results indicate that the Project would result in approximately 323 metric tons of $CO_2e$ per year associated with operation of this equipment.

**TABLE 14**
**OPERATIONAL GREENHOUSE GAS EMISSIONS**

| **Emission Source** | **Annual Emissions (Metric tons $CO_2e$/yr)** |
|---|---|
| Mobile Source | 195 |
| Area | < 1 |
| Energy | 115 |
| Water Use | 34.3 |
| Solid Waste | 14.3 |
| Off-road | 323 |
| **Total Operational** | **681** |

*See Appendix B for CalEEMod emission results files.*

As shown in Table 14, total operational GHG emissions associated with the Project are estimated to be 681 MT $CO_2e$ on an annual basis.

### 3.3.3 Combined Construction and Operational Emissions

Table 15 shows the combined net new construction, operational, and mobile GHG emissions associated with the proposed Project. As discussed above, temporary emissions associated with construction activity are amortized over 30 years (the anticipated life of the Project).

| **TABLE 15<br>COMBINED ANNUAL GREENHOUSE GAS EMISSIONS** | |
|---|---|
| **Phase** | **Annual Emissions (Metric tons $CO_2e$)** |
| Construction (amortized) | 21.5 |
| Operational | 681 |
| **Total** | **703** |
| **SCAQMD GHG Threshold** | **3,000** |
| **Exceeds Threshold?** | **No** |

*See Appendix B for annual CalEEMod emission results files.*

As shown in Table 15, total GHG emissions from construction and operation of the Project do not exceed the threshold of 3,000 MT $CO_2e$/year.

### 3.3.4 Service Population Analysis

Based on the potential for 13 total employees, the proposed Project would generate 54.1 MT $CO_2e$ per SP in 2027 (703 MT $CO_2e$ ÷ 13 employees). The service population estimate is higher than Lake Elsinore's city-wide efficiency-based target of 4.4 MT $CO_2e$ per service population per year in the CAP. However, according to the CAP, if projects are consistent with General Plan and CAP Consistency Checklist, then the project would be consistent with the CAP and the environmental review pertaining to GHG impacts may be streamlined. As discussed below under Consistency with Applicable Plans and Policies, the Project is consistent with the CAP Consistency Checklist. In addition, mobile emissions account for 28.6 percent of total Project emissions as summarized in Table 14. The Project would involve construction of additional employment opportunity, intended to serve nearby residents of the surrounding community. The Project would potentially reduce travel by these residents to further employment destinations, either elsewhere in Lake Elsinore or in neighboring communities. As a result, mobile emissions generated by the Project would not necessarily be new emissions, but rather existing emissions associated with travel to other, more distant places of employment that would instead be captured by the Project.

## 3.4 Consistency with Applicable Plans and Policies

The principal state plan and policy adopted to reduce GHG emissions is AB 32, the California Global Warming Solutions Act of 2006, and the follow up, SB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020 and the goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. The 2022 Scoping Plan, which outlines a framework to achieve SB 32's 2030 target, emphasizes innovation, adoption of existing technology, and strategic investment to support its strategies. Statewide plans and regulations in support of

these strategies, such as GHG emissions standards for vehicles (AB 1493), the Low Carbon Fuel Standard, and regulations requiring an increasing fraction of electricity to be generated from renewable sources, are being implemented at the statewide level; as such, compliance at a project level would occur as implementation continues statewide.

As mentioned above, Senate Bill 375, signed in August 2008, is a state-level policy directing each of California's 18 major MPOs to prepare an SCS that contains a growth strategy to meet emission targets for inclusion in the RTP. The applicable MPO for the Project site is SCAG, and project consistency with the goals contained in SCAG's 2024 RTP/SCS is discussed below.

### 3.4.1 SCAG 2024 RTP/SCS

SCAG's 2024 RTP/SCS includes a commitment to reduce emissions from transportation sources by promoting compact and infill development to comply with SB 375. The proposed warehouse project would not conflict with any of the SCAG's 2024 RTP/SCS goals, tailored for a warehouse development, as outlined in Table 16.

**TABLE 16**
**CONSISTENCY WITH APPLICABLE SCAG 2024 RTP/SCS GHG EMISSION REDUCTION STRATEGIES**

| Strategy / Action | Project Consistency |
|---|---|
| **Land Use and Growth** | |
| Promote infill, land-use/transit alignment, Livable Corridors, nodes-on-corridor. | **Consistent.** The Project site is located in a designated infill area/transit-priority industrial/commercial zone; within close proximity to corridor node; which reduces urban sprawl. |
| **Transportation / Goods Movement** | |
| Efficient goods movement; reduced VMT; freight strategies. | **Consistent.** On-site loading near arterials; access to highways; minimizes cross-town truck travel and truck routing connects to major highways so the good movement aligns with regional plans. |
| **Transit Initiatives** | |
| Enhance transit connectivity (walking/biking access to nearby bus or rail stops) in industrial zones. | **Consistent.** The Project would be developed within about 2 miles from the Malaga Bus Stop on Riverside Transit Agency Route 8. This would allow for easy access to public transportation for Project customers and employees to reduce VMT. |

**TABLE 16**
**CONSISTENCY WITH APPLICABLE SCAG 2024 RTP/SCS GHG EMISSION REDUCTION STRATEGIES**

| Strategy / Action | Project Consistency |
|---|---|
| **GHG / Air Quality** | |
| Support GHG targets and air-quality improvements.<br><br>Reduce emissions resulting from a project through implementation of project features, project design, or other measures.<br><br>Incorporate design measures to reduce energy consumption and increase use of renewable energy. | **Consistent.** The design and implementation of the proposed Project would comply with all requirements of the Title 24 standards, which include measures to reduce emissions. The project will incorporate electric or low-$NO_X$ forklift fleet and anti-idling signage for trucks. |

Source: SCAG 2024

### 3.4.2 Lake Elsinore Climate Action Plan (CAP)

The City's CAP, adopted in 2011, certified that the City's target is consistent with AB 32's 2020 goals. The CAP ensures that the City will provide local GHG reductions that will complement state efforts to reduce GHG emissions to the AB 32 target by 2020 and the Executive Order S-3-05 target by 2030. The proposed commercial Project warehouse building land use would not conflict with the applicable CAP reduction measures, as shown in Table 17.

**TABLE 17**
**CONSISTENCY WITH APPLICABLE LAKE ELSINORE CAP MEASURES**

| Measure | Project Consistency |
|---|---|
| ***Measure T-1.2: Pedestrian Infrastructure.*** *Through the development review process, require the installation of sidewalks along new and reconstructed streets. Also require new subdivisions and large developments to provide sidewalks or paths to internally link all uses where applicable and provide connections to neighborhood activity centers, major destinations, and transit facilities contiguous with the project site; implement through conditions of approval.* | **Consistent.** The Project site is located in a commercial/ industrial/ residential area and will incorporate sidewalks along the property frontage. |
| ***Measure T-2.1: Designated Parking for Fuel-Efficient Vehicles.***<br>*Revise the Municipal Code to require that new nonresidential development designate 10% of total parking spaces for any combination of low-emitting, fuel-efficient and carpool/vanpool vehicles (consistent with CalGreen Tier 1, Sections A5.106.5.1 and A5.106.5.3) and implement through conditions of approval. Parking stalls shall be marked "Clean Air Vehicle."* | **Consistent.** The Project would provide fuel efficient parking spaces in compliance with the Municipal Code and conditions of approval applied to the project. |

**TABLE 17**
**CONSISTENCY WITH APPLICABLE LAKE ELSINORE CAP MEASURES**

| Measure | Project Consistency |
|---|---|
| ***Measure E-1.1: Tree Planting Program.*** *Through the development review process, require new development to plant at minimum one 15-gallon non-deciduous, umbrella-form tree per 30 linear feet of boundary length near buildings, per the Municipal Code. Trees shall be planted in strategic locations around buildings or to shade pavement in parking lots and streets.* | **Consistent.** The Project would comply with all applicable Municipal Code policies related to tree planting. The Project would include a number of street trees and trees throughout the parking lot and adjacent to proposed structures. |
| ***Measure E-1.2: Cool Roof Requirements.*** *Amend the City Municipal Code to require new non-residential development to use roofing materials having solar reflectance, thermal emittance or Solar Reflectance Index (SRI) consistent with CalGreen Tier 1 values (Table A5.106.11.2.1) and implement through conditions of approval.* | **Consistent.** The Project's roofing material would be reviewed and approved for compliance with the City's Municipal Code. The proposed Project elements would be required to comply with the City ordinances and conditions of approval. |
| ***Measure E-3.2: Energy Efficient Street and Traffic Signal Lights.*** *Work with Southern California Edison to replace existing high pressure sodium streetlights and traffic lights with high efficiency alternatives, such as Low Emitting Diode (LED) lights. Replace existing City owned traffic lights with LED lights. Require any new street and traffic lights to be LED and implement through conditions of approval.* | **Consistent.** The Project would be required to comply with the City's conditions of approval related to new streetlights. |
| ***Measure E-4.1: Landscaping Ordinance.*** *Through the development review process, enforce the City's Assembly Bill 1881 Landscaping Ordinance; implement through conditions of approval.* | **Consistent.** The Project's landscape plan would be reviewed and approved by the City's Planning and Public Works Department for compliance with Assembly Bill 1881 and the City's Landscaping Ordinance. |
| ***Measure S-1.4: Construction and Demolition Waste Diversion.*** *Amend the Municipal Code to require development projects to divert to recycle or salvage nonhazardous construction and demolition debris generated at the site, resulting in at least a 65% reduction by 2020 (consistent with CalGreen Tier 1, Section A5.408.3.1). Require all new projects to be accompanied by a waste management plan for the project and a copy of the completed waste management report shall be provided upon completion.* | **Consistent.** A Waste Management Plan would be prepared for the Project, reviewed by the City for consistency with the City's Municipal Code, and be subject to City approval. |

The Project is consistent with state and local policies aimed at reducing GHG emissions. Therefore, the project would have a **less than significant** impact with respect to GHG emissions and climate change.

## 4.0 FINDINGS AND CONCLUSIONS

The Project-specific evaluation presented in the preceding analysis demonstrates that short-term emissions from construction of the Project are below all applicable SCAQMD regional daily thresholds of significance and LSTs. Therefore, air quality emissions from Project construction, as well as cumulative impacts with Project construction, are considered **less than significant**.

Emissions of all criteria pollutants from Project operation are below all applicable daily thresholds of significance and LSTs. Thus, the Project would not conflict with plans, violate an air quality standard, or contribute to an existing or projected violation, result in a cumulatively considerable increase in ozone or particulate matter emissions or expose receptors to substantial pollutant concentrations. Therefore, air quality emissions from Project operation are considered **less than significant**.

Based on the greenhouse gas analysis, the Project would neither conflict nor interfere with the state's implementation of SB 32's target of reducing statewide GHG emissions to 40 percent below 1990 levels by 2030. The Project will yield 703 MT $CO_2e$ on an annual basis, which is below the SCAQMD recommended numerical threshold of 3,000 MT/yr. The Project will be consistent with the applicable emission reduction strategies and measures. Therefore, the Project would result in **less than significant cumulative GHG impacts**.

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# APPENDIX A

## CONCEPTUAL SITE PLAN FOR 32291 CORYDON PROJECT

# APPENDIX B

## CALEEMOD AIR EMISSION MODEL RESULTS
### ANNUAL AND DAILY EMISSIONS FOR CONSTRUCTION AND OPERATION