

# Memo



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Date: July 15, 2020

To: Saima Qureshy, City of San Marcos

From: Ricky Williams, Poonam Boparai, Alyssa Way, and Brenda Hom

Subject: **Guidance to Demonstrating Consistency with the City of San Marcos Climate Action Plan: For Discretionary Projects Subject to CEQA**

Attachments: Attachment A – Screening Level Threshold Calculation Worksheets  
Attachment B – Numerical Threshold Calculation Worksheet

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The City of San Marcos (City) adopted an updated Climate Action Plan (CAP) in December, 2020. The CAP outlines strategies and measures that the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emissions reduction targets. The CAP is a plan for the reduction of GHG emissions in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

The City has also developed a CAP Consistency Checklist (Checklist), in conjunction with the CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. This memorandum summarizes the methodology and application of a GHG screening threshold (set at 500 metric tons carbon dioxide equivalent [MTCO<sub>2</sub>e] per year) for new development projects in order to determine if a project would need to demonstrate consistency with the CAP through the Checklist. The memorandum also describes a numerical GHG threshold (set at 2.1 MTCO<sub>2</sub>e per service population per year) for use as an alternative method for demonstrating consistency for projects that cannot use the Checklist due to unique land uses or circumstances but are otherwise consistent with CAP projections.

## 1 CLIMATE ACTION PLAN SUMMARY

The City's CAP contains a baseline inventory of GHG emissions for 2012, business-as-usual (BAU) projections of emissions to 2020 and 2030, a calculation of the City's targets based on a reduction from the 2012 baseline, and emission reductions with implementation of the CAP.

The City emitted approximately 599,000 MTCO<sub>2</sub>e in 2012. Accounting for future population and economic growth, the City projects GHG emissions of 549,000 MTCO<sub>2</sub>e in 2020 and 591,000 MTCO<sub>2</sub>e in 2030. The CAP sets

targets to achieve a four percent reduction from the 2012 baseline levels by 2020, and a 42 percent reduction from the 2012 baseline by 2030. The City's GHG reduction targets are consistent with the California Air Resources Board's (CARB's) recommendations for community-wide targets. Therefore, the City must implement strategies and measures that reduce emissions to 575,000 MTCO<sub>2</sub>e in 2020 and 347,000 MTCO<sub>2</sub>e in 2030. The projections demonstrate that the City is anticipated to meet its 2020 target under BAU conditions.

The CAP accounts for GHG emission reductions that would be achieved through State and federal actions. This "Legislatively-Adjusted" BAU projection estimates that the City would generate 429,000 MTCO<sub>2</sub>e in 2030 when accounting for federal and State actions. The City would need to implement additional actions to meet the 2030 emissions target. The CAP includes GHG reduction strategies and measures to achieve the City's 2030 target.

By meeting the 2020 and 2030 targets, the City will meet the 2030 State goal identified in Senate Bill 32 and maintain a trajectory to meet its proportional share of the 2050 State target identified in Executive Order S-3-05. Future actions anticipated by the State and possible federal initiatives would reduce the need for local measures and help ensure broader participation in emission reduction efforts.

The City's ability to grow its population and economy while meeting the GHG reduction targets will require broad-based participation from the entire community. Everyone who lives, works, shops, or recreates in the City contributes to the community's GHG emissions and will need to be part of the solution. This includes new development that is anticipated in the City through 2030. The CAP is intended to achieve reductions from existing and new sources. This is emphasized by the fact that the City's reduction targets are a reduction below baseline emissions. Therefore, GHG emissions in the City need to be reduced below existing levels while additional emissions are generated by growth through 2030. As such, new development can contribute its fair-share of GHG reductions by complying with CAP strategies and measures that were determined to be applicable through the Checklist development process. The following sections provide additional information about the steps for new development projects to demonstrate consistency with the CAP.

## 2 CEQA STREAMLINING PROVISIONS OF THE CLIMATE ACTION PLAN

This memorandum describes a GHG screening threshold and associated size-based criteria to determine if a project would be subject to the provisions of the CAP. Projects that exceed the GHG screening threshold are required to show consistency with the CAP through the Checklist. No additional screening or GHG studies are required, except in cases involving land use designation changes or when other unique circumstances warrant it, as determined by the Planning Division Manager through the CEQA process.

In most cases, compliance with the Checklist would provide the CEQA streamlining path to allow project-specific environmental documents, if eligible, to tier from and/or incorporate by reference the CAP's programmatic review of GHG impacts. Projects that are consistent with the General Plan and implement CAP GHG reduction measures may incorporate by reference the CAP's cumulative GHG analysis. The City's CAP meets the requirements under Section 15183.5 of the CEQA Guidelines as a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects. The Checklist provides a streamlined review process for the GHG emissions analysis of proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

### 3 PROJECT SCREENING THRESHOLDS

A GHG screening threshold of 500 MTCO<sub>2</sub>e/year is established for new development projects in order to determine if a project would need to demonstrate consistency with the CAP through the Checklist. Projects that are projected to emit fewer than 500 MTCO<sub>2</sub>e annually would not make a considerable contribution to the cumulative impact of climate change and would not need to provide additional analysis to demonstrate consistency with the CAP. **Table 1** lists types and sizes of projects that correspond to the 500 MTCO<sub>2</sub>e GHG screening threshold. For project types not listed in this table, the need for GHG analysis and mitigation will be made on a project-specific basis, considering the 500 MTCO<sub>2</sub>e per year screening threshold. Projects that are projected to emit more than 500 MTCO<sub>2</sub>e of GHGs annually would need to comply with applicable CAP strategies and measures. Compliance will be evaluated through completion of the CAP Consistency Checklist.

<b>Table 1 Project Review Thresholds</b>		
<b>Project/Plan Type <sup>1</sup></b>	<b>Screening Threshold <sup>2</sup></b>	<b>SFE Factor</b>
Single-Family Housing	36 dwelling units	1.0
Multi-Family Housing	55 dwelling units	0.7
Office	43 ksf	0.8
Commercial Space	20 ksf	1.8
Regional Shopping Center	18 ksf	2.0
Hotel	37 rooms	1.0
Restaurant (Sit-Down)	6.5 ksf	5.5
Restaurant (Drive-Thru, High Turnover)	2.4 ksf	15.0
General Light Industrial	58 ksf	0.6
University	263 students	0.1
Mixed-Use	<i>See Footnote 3</i>	--
<p>Notes: ksf = thousand square feet; SFE = single-family equivalency</p> <p><sup>1</sup> For project types not listed in this table, the need for GHG analysis and mitigation will be made on a project-specific basis, considering the 500 MTCO<sub>2</sub>e per year screening level.</p> <p><sup>2</sup> The screening threshold represents the maximum project size at which a project is estimated to emit less than 500 MTCO<sub>2</sub>e per year without the application of additional mitigation measures or project design features. Projects proposing greater unit, square footage, rooms, or student amounts than the above screening thresholds would be required to complete the CAP Consistency Checklist.</p> <p><sup>3</sup> Mixed-Use projects can provide a comparison to the screening thresholds using a single-family equivalent (SFE) factor. All projects that demonstrate they would propose development equal to or less than 36 SFE units are considered below the screening threshold. For example, a mixed-use development proposing 20 multi-family dwelling units and 10 ksf of commercial space would have an SFE value of 32 [equation: <math>(20 \times 0.7) + (10 \times 1.8) = 32</math>], and would be below the screening threshold.</p> <p>Source: Analysis conducted by Ascent Environmental in 2020</p>		

It should be noted that the 500 MTCO<sub>2</sub>e/year level must be strictly applied as a screening threshold and is not intended to be a threshold of significance. Projects that exceed this emissions level may not propose mitigation measures to reduce emissions below 500 MTCO<sub>2</sub>e. Projects that exceed the screening level would be required to complete the next step of the CAP Consistency Checklist as described below.

This 500 MTCO<sub>2</sub>e per year screening threshold is the first step in analyzing a project's GHG emissions. The screening threshold would apply to all discretionary projects. Based on review of project applications processed by the City from 2016 to 2018 (described below in Section 3.1, *Screening Threshold Development Methodology*, it was determined just over 10 percent of the emissions generated by projects processed by the City would be attributable to projects emitting fewer than 500 MTCO<sub>2</sub>e annually. Thus, nearly 90 percent of the estimated emissions from projects processed by the City (assuming these development trends would continue into the future) would be subject to CAP reduction measures applied through the Checklist. Based on historical emissions from projects processed by the City, the total emissions from development projects that would fall below the 500 MTCO<sub>2</sub>e threshold is approximately 3,000 MTCO<sub>2</sub>e annually. These emissions would account for less than one percent of the City's baseline GHG inventory and would be considered nominal at the citywide level. Thus, emissions from projects processed by the City and below the screening threshold would not be anticipated to result in cumulative GHG impacts and conflict with the City's ability to achieve its GHG reduction targets. The City's screening level and Checklist would capture a large proportion of emissions and require application of GHG reduction measures. In addition, the analysis in the CAP demonstrates that the City would achieve its GHG reduction targets through a combination of reduction measures applicable to new development and City-led actions that would also yield reductions from existing uses (e.g., increase in grid supply renewables). Ultimately, when processing projects the Planning Division Manager would maintain discretion to require projects to implement applicable CAP measures identified within this Checklist if unique circumstances exist for projects that are otherwise below the screening level.

For proposed projects at or above the screening threshold of 500 MTCO<sub>2</sub>e, applicants are required to complete the CAP Consistency Checklist, which is meant to provide a streamlined review process for proposed new development projects that are subject to discretionary review and require environmental review pursuant to CEQA. A properly completed Checklist documents how a proposed project complies with the CAP, and in so doing, demonstrates that the project's contribution to climate change impacts is not cumulatively considerable. Additionally, a project requiring a land use designation change that is more GHG-intensive than the land use assumed under the CAP must prepare a project-specific GHG analysis in accordance with the applicable CEQA Guidelines.

### 3.1 SCREENING THRESHOLD DEVELOPMENT METHODOLOGY

This section describes the methodology used to develop the screening threshold based on CAP data, historical projects processed by the City, and anticipated growth projections. The steps used to develop the screening threshold are outlined below and detailed calculation worksheets are provided in Attachment A.

- 1) A list of project applications processed by the City in the last three years was obtained to assess historical GHG emissions associated with new projects. Project data obtained included project name, land use or project type (e.g., residential, commercial), project size metrics (e.g., dwelling units, square feet, acres), and annual unmitigated GHG emissions (if available from the project environmental document). Project data were categorized by CEQA document, i.e., exemptions, negative declarations or mitigated negative declarations (NDs/MNDs), and Environmental Impact Reports (EIRs). The goal of this exercise was to gather sufficient data to match each project with an equivalent California Emissions Estimator Model (CalEEMod) land use type.
- 2) For projects that did not report estimated GHG emissions in their environmental documents, annual operational GHG emissions were estimated using CalEEMod. Emissions were approximated by assigning an equivalent CalEEMod land use type and size based on data obtained in Step 1.
- 3) Estimated reductions from CAP GHG reduction measures were allocated to new development based on their application to new uses (i.e., development between the CAP's baseline year of 2012 and forecast year of 2030). Estimated BAU emissions in 2030 were also allocated to new development using the same methodology. The proportion of new development's GHG emissions anticipated to be reduced through CAP measures was estimated using the reductions attributable to new development, compared with total BAU emissions.
- 4) The proportional reduction in emissions from new development estimated in Step 3 was applied to unmitigated project emissions in the City's list obtained under Step 1, to calculate anticipated reductions from application of CAP measures to projects in the City.
- 5) The average reductions that may be anticipated from an average annual set of projects from the City were calculated and compared to the reductions that would occur from an average annual set of new development under the CAP. This approach is used because the project list from the City represents development in recent years while new development analyzed in the CAP's forecast year would include decades' worth of new development. Thus, an "amortization" approach for new development is needed to compare projects across varying timelines.
- 6) A screening level input is set such that the percent of projects captured, and percent of emissions captured by the set level can be calculated.
- 7) The screening level was adjusted in an iterative manner to achieve an appropriate emissions capture rate and align with anticipated reductions from the CAP on an amortized basis. The goal of this exercise was to achieve the maximum emissions capture rate while getting the total estimated reductions from projects based on the screening level to align with total estimated reductions from new development under the CAP, on an amortized basis.

Based on the above analysis, the mass emissions level that achieves the goals outlined in Step 7 is **500 MTCO<sub>2</sub>e per year**. This level would capture 88 percent of emissions from new projects and would achieve enough reductions from captured emissions to meet the CAP's goals for new development. Thus, 88 percent of emissions from new projects would be subject to CAP reduction measures through the Checklist and would achieve reductions consistent with the analysis in the CAP through application of these measures. Projects that fall below this level would be considered less than significant and would not interfere with the City's ability to meet its CAP targets.

## 4 DEMONSTRATING CONSISTENCY WITH THE CLIMATE ACTION PLAN

The CAP Consistency Checklist provides direction about GHG reduction measures to be incorporated in individual projects, which will be used during the normal development review and building permit processes. Projects in the City may need to apply an additional analysis method (i.e., numerical GHG threshold) to demonstrate consistency with the CAP in certain circumstances. This method will supplement the CAP Consistency Checklist in cases when a project proposes unique land uses that require a quantitative analysis or other circumstances exist for a General Plan consistent project that warrant the use of the alternative method, as determined by the Planning Division Manager through the CEQA process. Utilizing the Checklist alone or in combination with the numerical GHG threshold, identified project features that help a project meet the provisions of the CAP shall then become part of project conditions of approval.

### 4.1 LAND USE CONSISTENCY

As noted previously, the first step in determining a project's consistency with the CAP is to compare the project size to the screening level criteria identified in Table 1. Projects that would generate less than 500 MTCO<sub>2</sub>e per year would not require further analysis. Based on the analysis described previously to determine the screening level threshold, these projects are considered to be of minimal intensity, would generate nominal emissions at the citywide level, and would typically achieve reduced GHG emissions through compliance with State regulations.

If a project would exceed the screening threshold, the next step in the CAP Consistency Checklist assesses a project's consistency with the growth projections and land use assumptions made in the CAP. If a project is consistent with the projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP's BAU projection and is within the scope of the CAP's analysis and program of measures that contribute towards reducing overall City GHG emissions below identified GHG targets.

If a project is consistent with the existing General Plan land use designation(s), it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the Checklist.

Not all projects that are proposing development that is not consistent with the existing General Plan land use designations would be in conflict with the CAP's projections. For example, if a project includes a General Plan land use amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations, it would still be within the projections assumed in the CAP. In addition to providing evidence to support the conclusion that the project would generate fewer emissions than existing designations, these projects would demonstrate consistency with the CAP through completion of Step 2 of the Checklist.

If a land use designation amendment results in a more GHG-intensive project, the project is required to prepare a quantitative GHG analysis based on applicable sections of the CEQA Guidelines and is not eligible for GHG analysis streamlining using the CAP Checklist.

## 4.2 CLIMATE ACTION PLAN REDUCTION MEASURES CONSISTENCY

The CAP identifies specific goals supporting each GHG reduction measure. Actions to implement the measures include a combination of ordinances, programs, incentives, outreach, and educational activities. As CAP implementation occurs, each action will be assessed and monitored.

As described in the CAP, there is an existing framework of federal, State, regional, and local policies and regulations that contribute to reducing GHG emissions. The CAP shows that reductions from existing regulations, in combination with additional General Plan policies and actions, would not be adequate to meet established targets. Local actions that reduce emissions from both the built environment and new development would be necessary. The CAP includes targets that relate to a percent reduction in GHG emissions below baseline levels. While the City will achieve reductions outlined in the CAP through capital programming, incentives, awareness and education, and planning processes and ordinances, new development can do its fair share in helping the City achieve its targets by incorporating measures consistent with the CAP. This also provides new development with the benefit of using CEQA streamlining provisions for addressing its GHG impacts.

### *CAP Consistency Checklist*

Based on the foregoing, the intent of the CAP Consistency Checklist is to demonstrate compliance with applicable CAP strategies and measures. The Checklist will be updated by the City as needed to incorporate new GHG reduction techniques or to comply with later amendments to the CAP, local ordinances, or State or federal law. If the CAP monitoring process (see CAP **Chapter 4**, “Implementation and Monitoring”) reveals the need for further reductions to stay on track to meet reduction targets, the Checklist may be updated to include additional applicable measures for new development.

The CAP is the City’s adopted policy document to reduce GHG emissions. Reduction strategies and measures in the CAP were evaluated through the CAP development process and represent the most relevant and effective pathway to achieving established targets, as determined by the City. As such, the City requires project applicants to use the Checklist to show consistency with the CAP and avail themselves of its streamlining benefits. The Checklist approach would not require quantification of GHG emissions and reductions from each measure because the City’s CAP has performed the analysis at a programmatic level. However, project applicants would still need to quantify design parameters to demonstrate compliance with CAP measures referenced in the Checklist (e.g., number of electric vehicle [EV] charging spaces).

## 4.3 ADDITIONAL METHOD TO DEMONSTRATE CONSISTENCY

Proposed projects that are not consistent with the City’s General Plan land use designation, and that intensify GHG emissions beyond current designations are required to provide a project-specific quantitative GHG analysis. The analysis must be prepared based on State CEQA Guidelines and identify substantiated thresholds of significance to determine project impacts. However, projects that are consistent with the General Plan but have unique land uses or circumstances for which no measures in the Checklist would apply, could demonstrate consistency with the CAP through comparison to a numerical GHG threshold.

Project-specific mitigation measures, which would be in addition to all Checklist items and all feasible on-site project design features, must include specific, enforceable actions to reduce project emissions, and an analysis is required to show the emission reductions achieved from each measure. Each mitigation measure should include references or a logical, fact-based explanation as to why a specific mitigation measure would achieve the stated reductions. Mitigation measures and/or design features must be supported with substantial evidence showing impacts have been reduced. With the implementation of CAP strategies and



measures, the City expects most projects will achieve CAP consistency through the Checklist alone. The additional analysis option is to be used only when unique circumstances warrant it, as determined by the Planning Division Manager through the CEQA process. In such cases, an applicant would need to provide a project-specific quantitative GHG analysis demonstrating consistency with the method described below. Project applicants would still need to complete the entire Checklist (i.e., Steps 1 and 2) and comply with all other applicable CAP measures to the extent feasible.

### ***Numerical Greenhouse Gas Threshold***

Projects that are consistent with the City's General Plan may apply the City's recommended numerical GHG threshold of **2.1 MTCO<sub>2</sub>e per service population per year**. Service population is defined as the sum of number of residents and jobs anticipated to be generated by the project. This threshold was established based on the CAP GHG reduction target in 2030 and demographics projections (i.e., population and employment) for the same year. A detailed worksheet used to determine this numerical threshold is included as Appendix B.

The numerical GHG threshold approach requires applicants to quantify their GHG emissions in 2030, consistent with the CAP horizon year, and estimate reductions from the applicable Checklist measure(s), in addition to supplemental mitigation measures necessary to achieve the numerical GHG threshold. The type, character, and level of mitigation would depend on the project type, size, location, context, and other factors. The availability of mitigation measures can change over time as well, with new technologies, building materials, building design practices, and other changes. Therefore, in developing project-specific reduction measures, the City recommends that a project applicant refer to current guidance from the California Air Pollution Control Officers Association (CAPCOA), CARB, the Governor's Office of Planning and Research (OPR), the California Attorney General, and the San Diego Association of Governments (SANDAG) to determine applicable mitigation measures and estimate their effectiveness.



# Attachment A

Screening Level Threshold Calculation Worksheets

Measure Number	Measure Description	How to scale to New Development/Growth Only	GHG Reductions in 2030 applicable to New Development (MT CO <sub>2</sub> e/yr)
T-2	Require EV Charging Stations in New Developments	New Construction	2,493
T-4	Provide Grants for Residents and Businesses to Install EV Charging Stations	Grant from City	8,282
T-8	Develop Bicycle Infrastructure in the City's General Plan Mobility Element	City Action, potentially supported by individual projects.	692
T-9	Adopt Citywide Transportation Demand Management Ordinance	New Construction	262
T-12	Reduce Parking Requirements for New Residential Developments Near Transit	New Construction near transit	2,017
E-1	Require New Residential Developments to Install Alternately-Fueled Water Heaters	New residential	1,275
E-2	Require installation of PV systems at New Non-Residential Developments	New Non-res	773
W-1	Reduce Outdoor Water Use for Landscaping	All projects	91
C-2	Increase Tree Planting in New Departments	All projects	97
Total Reduction from New Development Operating between 2012 and 2030.			15,982
Total Reduction from New Development Operating between 2012 and 2030 per average year of annual set of new development			888
Percent reduction from new development BAU emissions			6%

**Emissions Projections and Reductions (from EPIC's Technical Document)**

Year	Business-as-usual Projection (MT CO <sub>2</sub> e)	Target Emissions Level (% below baseline)	Target Emissions Level (MT CO <sub>2</sub> e)	Emissions Reduction Needed to Meet Target (MT CO <sub>2</sub> e)
2012	599,000	-	-	-
2020	549,000	4%	527,040	none
2030	591,000	42%	342,780	248,220
Emissions projections and reductions are rounded. Energy Policy Initiatives Center 2019.				

Approved Project Details in San Marcos  
2016 - 2018

Project Approval Year	Project Name	CalEEMod Land Use Type	Size (Acres)	Proposed Land Uses			CEQA Document	2018 Unmitigated GHG Emissions (Annual Operational) (MTCO2e/year) (using 2030 EFs)	Percent of total emissions	Mitigated GHG Emissions (applied to projects above screening level)
				Residential (# of du)	Non-Residential (square feet)	Other (Parks, Public etc.)				
2018	Fenton Discovery Village South	Single Family Homes	39 ac.	230	N/A	N/A	MND	3745.2	13.38%	241
2016	San Marcos Highlands (Farouk Kubba)	Single Family Homes	262	189	N/A	N/A	EIR	2591.6	9.26%	167
2017	Block 3 Extended Learning Building	University		N/A	229,310	N/A	EIR	2371.0	8.47%	153
2018	MU-4 Brookfield	Apartment Low Rise	23.2	220	N/A	N/A	MND	2071.4	7.40%	133
2017	RAF Pacifica	Industrial Park	15.7	N/A	212,233	N/A	MND	2029.5	7.25%	131
2016	PIMA Medical Institute	Medical Office Building		N/A	61,876	N/A	EIR	1662.8	5.94%	107
2018	JR Legacy/Global Carte	Hotel	1.66	N/A	71,000	N/A	MND	1540.0	5.50%	99
2017	Phase 2 Corner @ 2 Oaks	Condos	6.8 ac	118	N/A	N/A	MND	1048.5	3.74%	68
2018	Block 3, Lot 11	Retail		N/A	14,237	N/A	EIR	999.0	3.57%	64
		University		N/A	118,496	N/A				
2018	Mural Specific Plan	Single Family Homes	91.6 ac	89	N/A	1 acre park	EIR	793.9	3%	51
2016	Pacific Industrial	Regional Shopping Center	1.49	N/A	29,236	N/A	MND	790.4	2.82%	51
2016	Planning Area T	Single Family Homes		55	N/A	N/A	EIR	754.2	2.69%	49
2016	Costco Fuel Island Expansion	Gas Station		N/A	N/A	N/A	exempt, small structure	700.8	2.50%	45
	Phase 1 Corner @ 2 Oaks	Strip Mall	4.66 ac	N/A	13,499	N/A				
		Quality Restaurant		N/A	6,500	N/A	MND	677.3	2.42%	44
2017	San Elijo Town Center	Regional Shopping Center		12	23,232	N/A	Previous EIR	628.1	2.24%	40
2016	Lot 5, Block K	Condos		68	N/A	N/A	Previous EIR	604.2	2.16%	39
2016	Block K Condo Units	Condos		68	N/A	N/A	Previous EIR	604.2	2.16%	39
2016	San Elijo Area O	Single Family Homes		44	N/A	N/A	Previous EIR	603.3	2.15%	39
2018	West Health Adult Care/Service Facility	Medical Office Building		N/A	20,156	N/A	Exempt	541.7	1.93%	35
2018	Phase 2 San Elijo Hills Town Center	Apartment Low Rise + Regional Shopping Center	2.18	12	11,711		Previous EIR	429.6	1.53%	0
2018	Fenton Discovery Village North	City Park	41 ac	N/A	N/A	Public park	Previous EIR	301.1	1.08%	0
2018	1039 E. Mission Outdoor Storage	Unrefrigerated Warehouse - No Rail	2.96	N/A	N/A	N/A	Exempt	276.0	0.99%	0
2016	KRC Rock	General Light Industr		N/A	31,000	N/A	Exempt	264.3	0.94%	0
2017	Palomar College M&O Building	General Light Industry		N/A	28,157	N/A	FEIR	240.0	0.86%	0
2017	Crown Point San Elijo Area O	Single Family Homes		16	N/A	N/A	Previous EIR	219.4	0.78%	0
2017	Pacific San Marcos	Apartment Mid Rise + Strip Mall	1.12	31	4,530	N/A	Exempt	210.1	0.75%	0
2017	Palomar Station SP-Admin Amendment		14.32 ac	16	N/A	N/A	EIR	187.4	0.67%	0
2016	North County Shooting Center	Raquet Club		N/A	12,258	N/A	MND	172.1	0.61%	0
2016	SJ Asset Management	Apartment Low Rise + pool	3.38	50	N/A	N/A	MND	165.8	0.59%	0
2017	Crown Point San Elijo Area T	Single Family Homes		11	N/A	N/A	Previous EIR	150.8	0.54%	0
2018	ERS Fitness	Gym		N/A	5,474	N/A	Exempt	123.2	0.44%	0
2017	Montlie Rd Partners	Single Family Homes	2.7	9	N/A	N/A	MND	109.7	0.39%	0
2018	Klauss Schmidt	Parking Lot + Auto Care Care Center	31,243 square feet	N/A	1,200	N/A	Exempt	99.0	0.35%	0
2017	MAAC Preschool Expansion	Day Care	0.64 ac	N/A	2,661	N/A	MND	65.0	0.23%	0
2017	National Community Renaissance	Apartment Mid Rise	4.06	148	N/A	N/A	MND	39.0	0.14%	0
2016	Enstrom Mold	Manufacturing	0.37	N/A	9,358	N/A	Exempt	34.7	0.12%	0
2017	650 Bennett	Single Family Homes	1.21	3	N/A	N/A	Exempt	27.4	0.10%	0
2017	Chiu Parcel Map	Single Family Homes	0.71	2	N/A	N/A	Exempt	27.4	0.10%	0
2018	El Chino Tires	Automobile Care Center		N/A	2,080	N/A	Exempt	25.6	0.09%	0
2016	Richmar Park	City Park	2.86 ac	N/A	N/A	N/A	MND	21.0	0.08%	0
2018	Nimaax Auto Repair	Automobile Care Center		N/A	1,200	N/A	Exempt	14.8	0.05%	0
2016	Broemmelsiek Lot Split	Single Family Homes	0.57	2	N/A	N/A	Exempt	13.7	0.05%	0
2017	Twin Oaks Valley Winery	Manufacturing		N/A	3,528	N/A	Exempt	13.1	0.05%	0
2016	MAAC at 165 Vallecitos de Oro	General Office Building		N/A	2,020	N/A	Exempt	10.1	0.04%	0
2018	Verizon Twin Marcos (110 Richmar)			N/A	N/A	N/A	Exempt	0.0009	0.00%	0
2018	Verizon Palomar College (Borden)			N/A	N/A	N/A	Exempt	0.0009	0.00%	0
2017	Verizon Sunset Park (La Mirada)			N/A	N/A	N/A	Exempt	0.0009	0.00%	0
2016	Verizon Smlax (S Santa Fe Rd)			N/A	N/A	N/A	Exempt	0.0009	0.00%	0
2016	Verizon Nordahl Market Pl (Nordahl)			N/A	N/A	N/A	Exempt	0.0009	0.00%	0
2016	Verizon Borden Oaks (TOV)			N/A	N/A	N/A	Exempt	0.0009	0.00%	0
2016	Verizon Hollandia Daity (Mission Hills)			N/A	N/A	N/A	Exempt	0.0009	0.00%	0
2016	Verizon Jacks Pond (La Moree)			N/A	N/A	N/A	Exempt	0.0009	0.00%	0
2017	Kaiser Mobile MRI			N/A	N/A	N/A	Exempt	0.0000	0.00%	0
2018 - 2030 scaling factor			1.10							
2030 (60% renewable) SDGE Electricity Emission Factor (lb CO2e/MWh)			418.2390							
2030 (60% renewable) SDGE Electricity Emission Factor (MT CO2e/MWh)			0.1897							
Total Reduction									1594	
Yearly Average Difference from CAP Reductions									797	
									-91	

Land Use	Unit	CalEEMod 2016.3.2 Results (MTCO <sub>2</sub> e/year)	Emissions per unit (MTCO <sub>2</sub> e/unit)
Apartment Low Rise	100 DU	941.56	9.416
Apartment Mid Rise	100 DU	325.27	3.253
Automobile Care Center	1,000 sf	12.32	0.012
City Park	1 acre	7.34	7.345
Condos	100 DU	888.52	8.885
Day Care	1,000 sf	24.41	0.024
Gas station	10 Pumps	389.32	38.932
General Light Industry	10,000 sf	85.25	0.009
General Office Building	1,000 sf	5.01	0.005
Gym	1,000 sf	22.51	0.023
Industrial Park	100,000 sf	956.26	0.010
Manufacturing	10,000 sf	37.07	0.004
Medical Office Building	1,000 sf	26.87	0.027
Quality Restaurant	1,000 sf	54.13	0.054
Raquet Club	1,000 sf	14.04	0.014
Recreational Swimming Pool	1,000 sf	3.17	0.003
Regional Shopping Center	10,000 sf	270.34	0.027
Single Family Homes	100 DU	1371.23	13.712
Strip mall	1,000 sf	24.11	0.024
University	229,379 sf	2371.67	0.010
Unrefrigerated Warehouse - No Rail	100,000 sf	214.08	0.002

# Attachment B

## Numerical Threshold Calculation Worksheet

Year	Population	Jobs
2012	85,563	37,608
2013	87,591	38,630
2014	90,397	39,652

Year	Population	Commercial Jobs	Industrial Jobs	Total Jobs
2020	98,915	38,237	7,434	45,783
2030	108,824	44,486	7,755	52,348
2035	109,095	46,898	7,899	54,902
Source: SANDAG 2013; EPIC 2018.				

Year	Business-as-usual Projection (MTCO <sub>2</sub> e)	Target Emissions Level (% below baseline)	Target Emissions Level (MTCO <sub>2</sub> e)	Emissions Reduction Needed to Meet Target (MTCO <sub>2</sub> e)
2012	599,000	-	-	-
2020	549,000	4%	575,000	none
2030	591,000	42%	347,000	244,000
Notes: Emissions projections and reductions are rounded. Source: EPIC 2018				

Numerical GHG Threshold for Target Year Calculation		
$\frac{Emissions\ Target_X}{(Population_X + Total\ Jobs_X)}$ Where "X" = Target Year	Target Year	Numerical Threshold
	2030	2.1