

Draft Sacramento Metropolitan Air Quality Management District Greenhouse Gas Thresholds of Significance Update for Land Development Project Operational Emissions November 28, 2018

History of Greenhouse Gas Thresholds of Significance

The air districts of the Sacramento Federal Ozone Non-Attainment Area formed a greenhouse gas emission (GHG) thresholds of significance committee in 2009. The committee's purpose was to review GHG threshold methodologies around the state, consider local development project information, and develop Sacramento region GHG thresholds of significance to assist lead agencies in complying with the California Environmental Quality Act (CEQA).

Once the thresholds of significance were drafted, Sacramento Metropolitan Air Quality Management District (Sac Metro) staff conducted outreach to the cities and County of Sacramento, the building industry and the environmental community. The Sac Metro Board of Directors adopted the current GHG thresholds of significance in October 2014.

Current Thresholds of Significance

The current GHG thresholds of significance consist of a construction threshold (1,100 metric tons GHG/year), a land use operational threshold (1,100 metric tons GHG/year) and a stationary source operational threshold (10,000 metric tons GHG/year), see Table 1. Originally, Sac Metro recommended 21.7% mitigation from a business as usual scenario for projects that exceeded the operational thresholds.

TABLE 1 – Current GHG Thresholds of Significance

Current GHG Thresholds	
Construction	1,100 metric tons/year
Operational Land Use	1,100 metric tons/year
Operational Stationary Source	10,000 metric tons/year

As a result of the California Supreme Court decision in *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* in January 2016, Sac Metro recommended suspending the use of business as usual analysis and the recommended 21.7% mitigation level for projects exceeding the operational thresholds. This left agencies with the 1,100 metric tons GHG/year screening threshold and the need to demonstrate all feasible mitigation for projects exceeding the threshold. Sac Metro encouraged local agencies in Sacramento to develop a climate action plan (CAP) or greenhouse gas reduction plan that could be used by the local agency to reduce GHG emissions and streamline CEQA review for development projects, which can provide adequate mitigation for GHG impacts by demonstrating consistency with the reduction measures adopted in the CAP.

Need for Update

Changes in State legislation and approval of the 2017 Climate Change Scoping Plan since the adoption of the Sacramento Metropolitan Air Quality Management District's thresholds of significance have established the need for a threshold review and possible update.

SB32 was signed into law in September 2016. SB32 added Section 38566 to the California Health and Safety Code, which formally established the State target to reduce GHG emissions 40% below 1990 levels by 2030. Additionally, the California Air Resources Board (CARB) adopted its Climate Change Scoping Plan in December 2017, which provided recommended per capita community emission targets that could support the State's efforts to reach climate goals. Those targets include achieving 6 metric tons GHG/year/person by 2030 and 2 metric tons GHG/year/person by 2050.

Additionally, CARB recognized that GHG reduction efforts being undertaken by Metropolitan Planning Organizations in compliance with SB375, through Metropolitan Transportation Plans/Sustainable Community Strategies (MTP/SCS) would not provide sufficient reductions in GHG emissions and vehicle miles traveled to meet the 2050 State climate goals.

Review and Recommended Updates

After review of the current thresholds and available land use and GHG datasets, Sac Metro staff is recommending an update to the land use operational threshold to include a screening level for smaller projects and an efficiency metric for projects exceeding the screening level to determine significance of operational emissions.

Staff notes that projects exempt from CEQA review will continue to be exempt from GHG analysis. In addition, if a project is subject to CEQA review and the proponent demonstrates the project is consistent with all applicable measures from the lead agency's adopted Climate Action Plan (CAP) or GHG reduction plan, the proponent may qualify for CEQA streamlining of GHG analysis.

The following local lead agencies either have adopted or are in the process of preparing a CAP or GHG reduction plan.

TABLE 2 – Status of Climate Action Plans

AGENCY	STATUS
City of Sacramento	Adopted and update in process
City of Citrus Heights	Adopted
City of Elk Grove	Adopted and update in process
County of Sacramento	Development in process
City of Galt	Development in process
City of Folsom	Development in process

The current 1,100 metric tons GHG/year operational land use threshold was determined by analyzing a list of representative development projects in the Sacramento region and setting the

threshold level so that 90% of the emissions from projects would be captured for review and potential mitigation. At that time, 90% capture was determined to be sufficient to meet the AB32 goal of reducing GHG emissions to 1990 levels by 2020. Achieving the SB32 reduction target of reducing GHG emissions 40% below 1990 levels by 2030 will require reviewing and potentially mitigating emissions from more than the 90% capture level.

Staff analyzed land development projects submitted to Sac Metro for CEQA review (Mitigated Negative Declarations and Environmental Impact Reports) during calendar years 2014 through 2017. Of the 41 projects received, 35 projects included GHG emissions data that could be used in this analysis. The 6 projects without GHG data were removed from further analysis.

Since the trend in GHG analysis is to demonstrate consistency with a CAP, it is important to note that 15 projects demonstrated consistency with the local agency's CAP. Attachment A includes the list of projects and GHG emissions included in this review.

To show progress towards meeting more stringent State climate goals for 2030 and ultimately 2050, staff recommends increasing the emission capture rate from 90% to 98%. Seven of the 35 projects were below the current 1,100 metric tons GHG/year threshold. If staff recommended keeping the threshold level at 1,100 metric tons GHG/year, that would result in an emission capture rate of 99.65%, which would exceed the recommended 98% emission capture rate.

The analysis of the 35 projects demonstrated that setting the screening threshold at 3,500 metric tons GHG/year would result in an emission capture rate of 98%. Although fifteen of the 35 projects were below 3,500 metric tons GHG/year, those projects were estimated to emit in total only 21,962 metric tons GHG/year. The other 20 projects exceeding 3,500 metric tons GHG/year were estimated to emit in total 1.1 million metric tons GHG/year.

Although increasing the screening level from 1,100 metric tons GHG/year to 3,500 metric tons GHG/year appears to be a relaxation of a standard, it is more of a reflection of the types of projects being proposed in the Sac Metro jurisdiction. More master plan/specific plan projects are being proposed, which emit more GHGs. The larger, more emissive projects may have more options for reducing GHG emissions and reductions may be more cost effective.

Projects below the 3,500 metric tons GHG/year screening level would still contribute to GHG reductions by complying with State and local requirements including:

1. Implementing Title 24, Part 6, California Building Energy Efficiency Standards, as energy efficiency standards continue to become more stringent with each 4-year update, i.e. the recent adoption by the California Energy Commission to require the installation of solar on single-family homes and low-rise apartments starting in 2020.
2. Implementing state regulations that are continuing to reduce mobile source emissions.
3. Installing bicycle and pedestrian infrastructure as required by local municipal codes, roadway improvement standards, and subdivision standards. Additionally Title 24, Part

11, the California Green Building Code requires short and long term bicycle parking for non-residential projects.

4. The California Green Building Code also requires the installation of electric vehicle supply equipment to facilitate future installation of electric vehicle chargers in residential and non-residential projects.

For projects exceeding the 3,500 metric tons GHG/year screening threshold, Sac Metro staff recommends comparing the project emissions to one of the efficiency metrics shown in Table 3 to determine significance and the need to mitigate GHG emissions.

Proponents of land development projects mainly use the California Emissions Estimator Model (CalEEMod) to conduct air quality analyses. CalEEMod output includes metric tons of GHG/year and population data, which would be used to measure the project against the GHG/capita threshold. The GHG/service population threshold would be used for projects that include employment uses. CalEEMod emissions and population data would be used in addition to the number of jobs created by the project (provided by the project proponent) to measure against the GHG/service population threshold. Two build out years are provided, 2020 and 2036, which corresponds with the data available from SACOG. Proponents will have to extrapolate the target emission thresholds in build out years falling between 2020 and 2036.

For example, the air quality analysis for the Railyards Specific Plan (RSP) estimated 171,433 metric tons of GHG/year and a population of 26,700. Using very basic employment information/square footage of non-residential land uses, Sac Metro staff estimated 22,903 jobs would be created in the RSP. Sac Metro staff calculated 3.46 metric tons of GHG/service population for RSP, which is less than the 4.16 metric tons of GHG/service population threshold in 2020, and therefore would be considered less than cumulatively considerable for climate change impacts. Additional analysis would be needed for this project if it is expected to build out in a year other than 2020.

TABLE 3 – Recommended Land Use Operational GHG Thresholds of Significance

Recommended Land Use Operational GHG Thresholds of Significance		
<i>Year</i>	<i>MT GHG/capita</i>	<i>MT GHG/service population</i>
2020	5.90	4.16
2036	2.94	2.05

Staff utilized local emissions, population and employment data from the Sacramento Area Council of Governments (SACOG) adopted Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) and Environmental Impact Report (February 2016) to set the thresholds. Attachment B includes the data and references for the thresholds development. SACOG emissions data incorporated state GHG reduction measures for energy and fuel use

and MTP/SCS transportation emission reductions in compliance with SB375 for the SACOG region. The 2017 Climate Change Scoping Plan indicated that the four largest metropolitan planning organizations in the state, including SACOG, could achieve 20% of the 25% reduction in transportation emissions needed by 2035. Since an additional 5% reduction in GHG emissions from vehicle miles traveled reductions is needed to support the state climate goals, an additional 5% was reduced from the transportation emissions portion of the per capita and per service population metrics being recommended (See Attachment B for calculations).

Exemption for Neighborhood Serving Projects

There may be projects proposed that consist of a single land use that is either commercial, retail or office and that exceed the 3,500 metric ton/year screening level but cannot meet the per service population threshold. If a project falls into this category and is consistent with the lead agency’s zoning code defining the land use type and size as neighborhood serving, is generally under 50,000 square feet, and is designed to reduce vehicle miles traveled in the vicinity of the project, staff recommend the project be exempt from the GHG thresholds and be considered less than cumulatively considerable for climate change impacts.

Summary

Staff reviewed the current GHG thresholds of significance, State legislation and climate change activities that have occurred since the GHG thresholds were adopted in 2014, and available local land use and GHG data to determine that an update was needed to the operational threshold of significance for land use projects. Staff recommends the following changes to the GHG thresholds:

1. Change the 1,100 metric tons GHG/year land use operational threshold to 3,500 metric tons GHG/year. The threshold will be used as a screening level.
2. For projects exceeding the 3,500 metric tons GHG/year screening level, the project emissions, population and jobs information are used to compare to the applicable efficiency metrics: per capita or per service population thresholds listed in Table 3 to determine significance and the need to apply mitigation.
3. Provide an exemption for neighborhood serving projects that meet specific criteria.

For ease of reference, Table 4 compares and summarizes the current and proposed GHG thresholds.

TABLE 4 - Summary Comparison of Current and Proposed GHG Thresholds

Current GHG Thresholds		Proposed GHG Thresholds	
Construction	1,100 metric tons/year	Construction	1,100 metric tons/year
Operational Land Use	1,100 metric tons/year	Operational Land Use	3,500 metric tons/year
		2020 Per Capita	5.90 metric tons/capita
		2020 Per Service Population	4.16 metric tons/service population
		2036 Per Capita	2.94 metric tons/capita
		2036 Per Service Population	2.05 metric tons/service population
Operational Stationary Source	10,000 metric tons/year	Operational Stationary Source	10,000 metric tons/year

Attachment A – List of Projects Reviewed

Projects with CEQA Documents Received by the Air District (2014-2017)

6/8/2018

Project Name	Jurisdiction	Document Type	Document Event Date	land use sizes (ft2 or dwelling units)
Anatolia II Elementary School	Elk Grove Unified School District	Draft Mitigated Negative Declaration (MND)	8/28/2014	70,000
Del Paso Manor Elementary School Improvement Project	San Juan Unified School District	Final Mitigated Negative Declaration (MND)	10/27/2017	26,100
SCT/LINK Fueling & Maintenance Facility	City of Galt	Draft Mitigated Negative Declaration (MND)	8/23/2017	22,550
Veranda @ River Oaks	City of Galt	Draft Mitigated Negative Declaration (MND)	12/12/2017	60 sfdu
Vintage Park General Plan Amendment	County of Sacramento	Final Mitigated Negative Declaration (MND)	8/18/2016	81 sfdu
Bruceville Terrace	City of Sacramento	Draft Mitigated Negative Declaration (MND)	12/27/2016	89
Vineyard Creek Residential Subdivision (a sub-project of SAC200300706)	County of Sacramento	Draft Mitigated Negative Declaration (MND)	9/22/2017	79 sfdu
ARCO AM/PM Bradshaw and Kiefer PCN	County of Sacramento	Draft EA/IS	11/29/2016	8 pump gas station, 3,180 24hr convenience, 1152 car wash, 5470 fast food
Sacramento Coca Cola (Coke) Expansion	City of Sacramento	Draft Mitigated Negative Declaration (MND)	9/19/2017	41,200 and 6,100
8670 Fruitridge Industrial Warehouse IS/MND	City of Sacramento	Draft Mitigated Negative Declaration (MND)	6/3/2016	243,675
Cedar Flats Estates fka Village at Lexington Heights Project	City of Galt	Final Mitigated Negative Declaration (MND)	2/16/2016	120
Capital Reserve	City of Elk Grove	Draft EIR /EIS	10/3/2014	84 plus 3 acre commercial
The Crossings Student Housing	City of Sacramento	Draft Mitigated Negative Declaration (MND)	6/28/2016	225 mfdu, 10,000 R&D
Elverta Park	County of Sacramento	Final EIR /EIS	9/24/2015	229 sfdu
Sacramento Convention Center Renovation & Expansion & Hotel	City of Sacramento	Draft EIR /EIS	11/11/2017	63,930
Downtown Rio Linda Special Planning Area	County of Sacramento	Draft Mitigated Negative Declaration (MND)	8/6/2015	43,000 office, 12,000 medical office, 9,000 restaurant, 56,000 retail, 4,000 supermarket, 3 pump gas, 45 mid apt, 15 sfdu
Elk Grove Civic Center Aquatic Complex	City of Elk Grove	Final EIR /EIS	8/22/2014	75,000 and 30,000
CVS/Pharmacy Development - Fair Oaks and Howe Retail Center	City of Sacramento	Final EIR /EIS	11/1/2014	16,500 pharmacy dthru, 50,880 supermarket
southeast watt	County of Sacramento	Final Mitigated Negative Declaration (MND)	9/27/2016	299 sfdu
Land Park Commercial Center	City of Sacramento	Final EIR /EIS	10/12/2016	53,900 regional shopping and 55,000 supermarket
McKinley Village	City of Sacramento	Final EIR /EIS	3/24/2017	328 sfdu, park, recreation center
Barrett Ranch East	County of Sacramento	Final EIR /EIS	4/26/2017	497 sfdu, 196 mfdu, 108,900
Dry Creek Oaks	City of Galt	Draft Mitigated Negative Declaration (MND)	9/2/2015	202 sfdu, 140 assist living, 98 retirement, 206,000 retail
Northborough (in Elverta Specific Plan)	County of Sacramento	Final EIR /EIS	11/1/2017	1141 sfdu, 11 acre school site
Mather Airport Master Plan	County of Sacramento	Draft EIR /EIS	2/18/2014	warehouse (hangars), offices
The Panhandle (Metre)	City of Sacramento	Draft EIR /EIS	6/19/2017	2,660 sfdu, 101,277 commercial
Galt Annexation of Industrial Area and Twin Cities Road Areas	City of Galt	Draft Mitigated Negative Declaration (MND)	8/9/2017	900,000 and 2,900,000
Eastview Specific Plan and Annexation	City of Galt	Final EIR /EIS	12/18/2015	1,735 sfdu, 850 elementary school, 127,000 retail
Russell Ranch	City of Folsom	Draft EIR /EIS	12/17/2014	713 sfdu, 406 low rise apt, 380,000 regional shopping
Bilby Ridge SOI Amendment (landowner initiated)	LAFCO	Draft EIR /EIS	12/15/2017	1,846 sfdu, 19 acre office, 32 acre commercial, 10 acre school, 9 acre park
Cordova Hills	County of Sacramento	Final EIR /EIS	3/1/2016	over 8,000 residential units, office, retail, schools, university, parks
Downtown Specific Plan	City of Sacramento	Draft EIR /EIS	9/22/2017	3,510,890 office, 435,850 govt, 643,800 medical office, 280,030 restaurant, 13,401 mid apt., 2,303,040 strip mall
Sacramento Railyards (Railyards Specific Plan & Intermodal Facility)	City of Sacramento	Draft EIR /EIS	6/9/2016	4,543,000 office, 1,228,000 hospital, 395,700 arena, 1,100 hotel rooms, 6,000 mid rise apt., 180,000 hardware, 905,000 strip mall
Kammerer Rd/SR 99 SOI Amendment (landowner initiated)	LAFCO	Final EIR /EIS	11/3/2017	6,091,000 office, 2,696 student el. School, 2,338,000 light industrial, 1,786 du apartment low rise, 3,214 sfdu, 1,362,000 regional shopping
Southeast Policy Area (SEPA) (f.k.a.Southeast Area Specific Plan and Rezone)	City of Elk Grove	Final EIR /EIS	6/1/2014	5,244,620 office, 785,820 office park, 2973 students Elementary school, 1,411,340 industrial, 1230 apt mid, 1549 condo, 325 condo high, 1628 sfdu, 176,850 strip mall

Comparing Project Emissions to Potential Per Capita and Per Service Population Thresholds

							Does not meet 2020	
6/8/2018							Meets 2020	
							6	9
Project Name	land use sizes (ft2 or dwelling units)	land use type	operational GHG emissions (MT/year) NOTE shading for 1,100 MT and 3,500 MT	EMPLOYEES	POPULATION (2.67/unit)	PER CAPITA EMISSIONS (COMPARE TO 5.9 (2020) OR 2.94 (2036))	PER SERVICE POPULATION EMISSIONS (COMPARE TO 4.16 (2020) OR 2.05 (2036))	
Anatolia II Elementary School	70,000	school	340	62			5.49	
Del Paso Manor Elementary School Improvement Project	26,100	school	362	23			15.69	
SCT/LINK Fueling & Maintenance Facility	22,550	warehouse	433	29			15.00	
Mather Airport Master Plan (modification)	warehouse (hangars), offices	airport buildings and operations	623	702			0.89	
Veranda @ River Oaks	60 sfd	residential	855		160	5.34		
Vintage Park General Plan Amendment	81 sfd	residential	1,011		216	4.68		
Bruceville Terrace	89	residential	1,018		238	4.28		
Vineyard Creek Residential Subdivision (a sub-project of SAC200300706)	79 sfd	residential	1,101		213	5.17		
ARCO AMPM Bradshaw and Kiefer PCN	8 pump gas station, 3,180 24hr convenience, 1152 car wash, 5470 fast food		1,324	68			19.54	
Sacramento Coca Cola (Coke) Expansion	41,200 and 6,100	office and retail	1,496	197			7.60	
8670 Fruitridge Industrial Warehouse IS/MND	243,675	warehouse	1,524	312			4.88	
Cedar Flats Estates fka Village at Lexington Heights Project	120	residential	1,584		320	4.94		
Capital Reserve	84 plus 35,940 sf commercial	residential and commercial	1,614	94	224		5.07	
The Crossings Student Housing	225 mfd, 10,000 R&D	residential and office	2,339	25	601		3.74	
Elverta Park	229 sfd	residential	3,060		611	5.00		
Sacramento Convention Center Renovation & Expansion & Hotel	63,930	arena	3,278	211			15.54	
Downtown Rio Linda Special Planning Area	43,000 office, 12,000 medical office, 9,000 restaurant, 56,000 retail, 4,000 supermarket, 3 pump gas, 45 mid apt, 15 sfd	office, retail, apartments, residential	3,769	365	160		7.18	
Elk Grove Civic Center Aquatic Complex	75,000 and 30,000	gov office and pool	4,504	500			9.01	
CVS/Pharmacy Development - Fair Oaks and Howe Retail Center	16,500 pharmacy dthru, 50,880 supermarket	retail, supermarket	4,547	84			53.97	
southeast watt	299 sfd	residential	5,053		798	6.33		
Land Park Commercial Center	53,900 regional shopping and 55,000 supermarket	retail, supermarket	5,205	235			22.15	
McKinley Village	328 sfd, park, recreation center	residential	5,391		876	6.16		
Barrett Ranch East	497 sfd, 196 mfd, 108,900	residential and commercial	5,560	185	1850		2.73	
Dry Creek Oaks	202 sfd, 140 assist living, 98 retirement, 206,000 retail	residential, assisted living, retail	10,621	350	1175		6.96	
Northborough (in Elverta Specific Plan)	1141 sfd, 11 acre school site (est 44,000 sf)	residential, school	10,988	39	3046		3.56	
The Panhandle (Metre)	2,660 sfd, 101,277 commercial	residential, commercial	27,600	264	7102		3.75	
Galt Annexation of Industrial Area and Twin Cities Road Areas	900,000 and 2,900,000	general office and light industrial	36,412	9224			3.95	
Eastview Specific Plan and Annexation	1,735 sfd, 850 elementary school (46,750 sf), 127,000 retail	residential, school, retail	50,152	257	4632		10.26	
Russell Ranch	713 sfd, 406 low rise apt, 380,000 regional shopping	residential, retail	51,548	992	2988		12.95	
Bilby Ridge SOI Amendment (landowner initiated)	1,846 sfd, 19 acre office, 32 acre commercial, 10 acre school (est. 44ksf), 9 acre park	residential, office, commercial, schools, parks	71,318	2260	4929		9.92	
Cordova Hills	over 8,000 residential units, office, retail, schools, university, parks	residential, retail, schools, university	127,070	6548	24057		4.15	
Downtown Specific Plan	3,510,890 office, 435,850 govt, 643,800 medical office, 280,030 restaurant, 13,401 mid apt, 2,303,040 strip mall	office, govt, residential, retail, medical	127,116	22750	35781		2.17	
Sacramento Railyards (Railyards Specific Plan & Intermodal Facility)	4,543,000 office, 1,228,000 hospital, 395,700 arena, 1,100 hotel rooms, 6,000 mid rise apt., 180,000 hardware, 905,000 strip mall	office, retail, hospital, arena, hotel, apartments, retail	171,433	22903	26700		3.46	
Kammerer Rd/SR 99 SOI Amendment (landowner initiated)	6,091,000 office, 2,696 student el. School, 2,338,000 light industrial, 1,786 du apartment low rise, 3,214 sfd, 1,362,000 regional shopping	office, industrial, school, residential, retail	191,945	20000	13350		5.76	
Southeast Policy Area (SEPA) (f.k.a.Southeast Area Specific Plan and Rezone)	5,244,620 office, 785,820 office park, 2973 students Elementary school, 1,411,340 industrial, 1230 apt mid, 1549 condo, 325 condo high, 1628 sfd, 176,850 strip mall	residential, industrial, office, school,	192,892	23410	17010		4.77	

Attachment B – Data and References

GHG, POPULATION, AND EMPLOYMENT DATA							
YEAR	MTP/SCS data			calculated from MTP/SCS data		GHG MTCO ₂ e/CAPITA 2017 CARB SCOPING PLAN	AEP Land Use Efficiency Metric Calculations, GHG MTCO ₂ e/Service Pop
	POPULATION	EMPLOYMENT	GHG MTCO ₂ e	GHG MTCO ₂ e/ CAPITA	GHG MTCO ₂ e/ SERVICE POP		
2012	2,268,138	887,965	20.78	9.16	6.58		
2020	2,472,567	1,033,297	15.00	6.07	4.28		4.70
2030						6.00	2.60
2036	3,078,772	1,327,323	9.27	3.01	2.10		
2040	3,080,000	1,350,000					
2050						2.00	0.80

2012, 2020, 2036 population and employment info from Chapter 3 of the 2016 MTP/SCS policy document

2012, 2020, 2036 emissions info from Chapter 8 of the 2016 MTP/SCS DEIR (includes state measures to reduce emissions and MTP/SCS transportation improvements)

2040 population and employment info from December 14, 2017 SACOG Board Item 17-12-18 on the 2020 MTP/SCS Update: Policy Framework and Regional Growth Projections

AEP Beyond Newhall and 2020: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California, April 2016

EMISSIONS BY SECTOR WITH 5% TRANSPORTATION REDUCTION			
Sector	SACOG GHG Emissions		
	2020	2036	
Transportation	8.13	4.63	
Electricity Generation	3.14	1.48	
Residential/Commercial	2.20	1.67	
Industrial	0.60	0.60	
Agriculture & Forestry	0.93	0.88	
Total	15.00	9.26	
5% reduction from Transportation Emissions	0.41	0.23	
Reduced Total	14.59	9.03	

GHG Calculated Thresholds for 2020 and 2036					
	<i>MTP/SCS data</i>			<i>calculated</i>	
YEAR	POP.	EMPL.	GHG MMTCO2e (minus 5% from transportation contribution)	GHG MTCO2e/ CAPITA	GHG MTCO2e/ SERVICE POP
2020	2,472,567	1,033,297	14.59	5.90	4.16
2036	3,078,772	1,327,323	9.04	2.94	2.05
<i>Uses MTP/SCS data, including an additional 5% reduction in transportation sector GHG</i>					