

APPENDIX F-1



DOUGLASKIM+ASSOCIATES,LLC

To: Stacie Henderson
From: Douglas Kim, AICP
Date: August 16, 2021
Re: Southern California Flower Market

This memo provides supplemental analysis and information to address aspects of the Southern California Flower Market's (Project) potential impact on global warming attributable to the Project's emission of greenhouse gas (GHG), which impact was initially evaluated in the Greenhouse Gas (GHG) chapter of the Draft Environmental Impact Report (Draft EIR) prepared by the City of Los Angeles (City) for the Project, dated September 2018.

1. **Consistency with SB 32's 40 percent target by 2030.** SB 32 calls for Statewide GHG reductions of 40 percent below 1990 levels by 2030. As explained in the Draft EIR, in 2016, the Legislature passed SB 32, which calls for statewide reductions in GHG emissions to 40 percent below 1990 levels by 2030. In November 2017, the California Air Resources Board (CARB) adopted a Climate Change Scoping Plan (2017 Scoping Plan) that addressed how long-term objectives could be met, including SB 32 targets in 2030. Specifically, the 2017 Scoping Plan states that the Plan "establishes a path that will get California to its 2030 target" and "identifies how the State can reach our 2030 climate target to reduce...GHG emissions by 40 percent from 1990 levels." (2017 Plan at pp. 1).¹

Independent studies confirm CARB's determination that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.² Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions

¹ California Air Resources Board California's 2017 Climate Change Scoping Plan, https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

² Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors. https://www.ethree.com/wp-content/uploads/2017/02/E3_Project_Overview_20150406.pdf

level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies would allow the state to meet the 2050 target.

In addition, on May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan (CARB's First Update).³ CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent required by applicable by law (CARB's First Update, p. 4 and Table 6 pp. 94-99).

When compared to SB 32, the Proposed Project would be consistent with its objectives and the GHG reduction-related actions and strategies of the 2017 Scoping Plan. Table No. 1, below, follows the same approach used in the Draft EIR for evaluating consistency with CARB's AB 32 Scoping Plan, which was adopted to meet the goals of AB 32 (Draft EIR, pp. 4.F-34 to 35; Table 4.F-7).⁴⁵ The 2017 Scoping Plan and the SB 32 objectives that drive it involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. Based on the following analysis, the Project would be consistent with the State's Climate Change Scoping Plan's objective of reducing 2030 GHG emissions in accord with SB 32.

³ California Air Resources Board, First Update to the Climate Change Scoping Plan, May 2014; https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf

⁴ Ibid.

⁵ California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document, August 2011; https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/final_supplement_to_sp_fed.pdf



**Table 1
Consistency Analysis—2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Senate Bill 350 (SB 350) requires that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.^a</p> <ul style="list-style-type: none"> • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. • Reduce GHG emissions in the electricity sector through the implementation of the above measures as modeled in Integrated Resource Plans to meet GHG planning targets in the IRP. Load-serving entities and publicly-owned utilities meet GHG emission reductions through measures described in IRPs. 	<p>California Public Utilities Commission, California Energy Commission, CARB</p>	<p>Consistent. As Los Angeles Department of Water and Power (LADWP) would provide electricity service to the Project Site, by 2030 the Project would use electricity consistent with the requirements of SB 350. It is assumed that LADWP will receive at least 33 percent of electricity from renewable sources by year 2020 and 50 percent by 2030 (with a straight-line interpolation for the Project buildout year of 2024). The Project would comply with CalGreen and Title 24 energy efficiency standards.</p> <p>Consistent. The Project complies with the State’s energy efficiency targets as it would be designed and constructed to meet the City’s Green Building Code for renovation and construction and will include several project design features designed to reduce energy consumption.</p> <p>Consistent. The Project complies as it would be designed and constructed to meet the City’s Green Building Code for renovation and construction and will include several project design features designed to reduce energy consumption. This includes use of ENERGY STAR-rated appliances in residences, energy-efficient boilers, heaters, and air conditioning systems.</p>

Table 1
Consistency Analysis—2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Senate Bill 100 (SB 100). The California Renewables Portfolio Standard Program (2018) requires a Statewide renewables energy portfolio that requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026 and 60 percent by December 31, 2030. It would also require that local publicly owned electric utilities procure a minimum quantity of electricity from renewable energy resources achieve 44 percent of retail sales by December 31, 2024 and 60 percent by December 31, 2030.</p>	<p>LADWP, California Public Utilities Commission</p>	<p>Consistent. LADWP is required to generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. The results of DWP’s Los Angeles “100% Renewable Study” (LA100), released March 2021, show that a reliable, 100% renewable electricity supply is indeed achievable for LA by 2045 or even a decade sooner. As LADWP would provide electricity service to the Project, by 2030 the Project would use electricity consistent with the requirements of SB 100. The Project would comply with this this action/strategy being located within the LADWP service area and compliance with CalGreen and Title 24 energy efficiency standards</p>
<p>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</p> <ul style="list-style-type: none"> • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Medium- and heavy-duty GHG Phase 2. • Innovative Clean Transit • Last Mile Delivery • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.” 	<p>CARB, California State Transportation Agency, Southern California Gas, Caltrans California Energy Commission, Office of Planning and Research, Local agencies</p>	<p>Consistent. GHG emissions generated by Project-related vehicular travel would benefit from proposed regulation, and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program for LEV and ZEVs, consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. In addition, in December 2008, the regulation requires all public transit agencies to gradually transition to a 100-percent zero-emission bus fleet and encourages them to provide innovative first and last-mile connectivity and improved mobility for transit riders. Promoting the development and use of advanced clean trucks will help CARB achieve its emission reduction strategies as outlined in the State Implementation Plan (SIP), Sustainable Freight Action Plan, Senate Bill (SB) 350, and Assembly Bill (AB) 32.</p> <p>With regard to SB 375, the Project represents an infill development within an existing urbanized area that would concentrate more hotel and hospitality uses within an HQT. Therefore, the Project would be consistent with SB 375 and SCAG’s 2020-2045 RTP/SCS. Furthermore, the RTP/SCS would result in an estimated 19-percent decrease in per capita</p>

**Table 1
Consistency Analysis—2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		GHG emissions from passenger vehicles by 2035. Project-related transportation emissions would be reduced by approximately 30 percent and therefore, the Project would be consistent with SB 375 and the 2020-2045 RTP/SCS.
Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)	CARB	Consistent. The Project would be consistent with SB 375 for developing an infill project within an existing urbanized area. This would concentrate new residential, commercial, and other uses within an HQT. Project-related transportation emissions would be reduced by approximately 30 percent and therefore, the Project would be consistent with SB 375 and the 2020-2045 RTP/SCS.
<p>By 2019, adjust performance measures used to select and design transportation facilities.</p> <p>Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g. via guideline documents, funding programs, project selection).</p>	California State Transportation Agency and Southern California Gas, Office of Planning and Research, CARB, GoBiz, IBank, Department of Finance, California Transportation Commission, Caltrans	Not Applicable. The Project would not involve construction of transportation facilities. However, the Project would be located in close proximity to ample transit opportunities, including Metro local routes and LADOT transit services. The access to active transportation infrastructure for both pedestrians and bicyclists will further reduce impacts to the transportation infrastructure in Downtown Los Angeles.
By 2019, develop pricing policies to support low- GHG transportation (e.g. low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).	California State Transportation Agency, Caltrans, California Transportation Commission, Office of Planning and Research/Southern California Gas, CARB	Consistent. The Project would support this policy since the Applicant would provide electric vehicle supply wiring (EV-ready) would be available in at least 20 percent of the total code-required parking spaces for the Project.

**Table 1
Consistency Analysis—2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Implement California Sustainable Freight Action Plan, including improving freight system efficiency. This includes deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.</p>	<p>CARB</p>	<p>Not Applicable. The Project land uses would not include freight transportation or warehousing. Therefore, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.</p>
<p>Adopt a Low Carbon Fuel Standard (LCFS) with a Carbon Index (CI) reduction of 18 percent.</p>	<p>CARB</p>	<p>Not Applicable. This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors.</p> <p>The current LCFS, last amended in September 2018, establishes a 20 percent reduction in CI from a 2010 baseline by 2030.</p>
<p>Mobile</p>		
<p>Implement the Short-Lived Climate Pollutant Strategy by 2030:</p> <ul style="list-style-type: none"> • 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. • 50 percent reduction in black carbon emissions below 2013 levels. 	<p>CARB, CalRecycle, California Department of Food and Agriculture, California State Water Resources Control Board, Local air districts</p>	<p>Consistent. The Project would comply with the CARB Short-Lived Climate Pollutant (SLCP) Reduction Strategy, which limits the use of hydrofluorocarbons for refrigeration uses.</p>
<p>By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.</p>	<p>CARB, CalRecycle, California Department of Food and Agriculture, California State</p>	<p>Not Applicable. This strategy calls on regulators to reduce GHG emissions from landfills and is not applicable to a development project. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide</p>

**Table 1
Consistency Analysis—2017 Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
	Water Resources Control Board, Local air districts	disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025.
Implement the post-2020 Cap-and-Trade Program with declining annual caps.	CARB	Not Applicable. This applies to State regulators and is not applicable to a development project. Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.
<p>By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:</p> <ul style="list-style-type: none"> • Protect land from conversion through conservation easements and other incentives. • Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity. • Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments. • Establish scenario projections to serve as the foundation for the Implementation Plan. 	California Natural Resources Agency and departments within, California Department of Food and Agriculture, CalEPA, CARB	Not Applicable. This applies to State regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.
Solid Waste		
Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018	CARB	Not Applicable. This applies to State regulators and is not applicable to a development project. This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.

Table 1
Consistency Analysis—2017 Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Water (Three percent of project inventory)		
Implement Forest Carbon Plan	California Natural Resources Agency, CAL FIRE, CalEPA	Not Applicable. This applies to State regulators and is not applicable to a development project. This regulatory program applies to state and federal forest land, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Forest Carbon Plan.
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Not Applicable. This applies to State regulators and is not applicable to a development project. Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.
<p>a Senate Bill 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.</p> <p>b CARB, Advance Clean Cars, Midterm Review, www.arb.ca.gov/msprog/acc/acc-mtr.htm.</p> <p>c CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks</p> <p>d CARB, LCFS Rulemaking Documents, https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/lcfs-regulation</p> <p>e CARB, Reducing Short-Lived Climate Pollutants in California, https://ww2.arb.ca.gov/our-work/programs/slcp</p> <p>f CARB, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, www.calrecycle.ca.gov/climate/slcp/.</p> <p>Source: California Air Resources Board (CARB), California’s 2017 Climate Change Scoping Plan, November 2017.</p>		



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In addition to the Project's consistency with applicable GHG reduction regulations and strategies, the Project would not conflict with future anticipated statewide GHG reductions goals. Specifically, CARB has outlined strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32. These strategies include renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the penetration of zero-emission or hybrid vehicles into the vehicle fleet, reducing the rate of growth in VMT, supporting high-speed rail and other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.

The Project would also benefit from statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. LADWP provides 32 percent of electricity via renewable sources but has committed to increasing renewable sources that exceed the Renewables Portfolio Standard requirements by providing 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036. The Project would also include energy efficient mechanical systems, energy efficient glazing and window frames, energy-star appliances to be installed on-site, and the use of high-efficiency lighting. The Project would also benefit from statewide efforts to improve fuel economy of vehicles. The Project would also help reduce VMT growth given its infill location, design and complementary proposed mix of uses at an infill site that is accessible to existing Metro local and rapid bus lines, and within 2,500 feet of the Metro Rail Pershing Square station with access to the B and D Lines, as well as being within 4,600 feet of the Metro Rail Little Tokyo/Arts District building with access to the L Line.

2. Additional Analysis

Both AB 32 and SB 32 call for reduction of GHG emissions relative to a baseline year (1990). Therefore, CARB, as the regulatory agency primarily responsible for implementing a State-wide plan to achieve the goals in AB 32 and SB 32, had to establish a baseline for GHG emissions (referred to as "business as usual" or "BAU" in CARB's scoping plans). The Scoping Plan sets forth the BAU projection, which assumes no conservation or regulatory efforts beyond what was in place when the forecast was made. Similarly, the No Action Taken scenario (2020 NAT scenario) evaluated in the EIR for the Project is modeled on the BAU concept in CARB's scoping plans. Under the 2020 NAT scenario, the Project's GHG emissions are estimated assuming GHG reduction measures are not in place. In contrast, the As Proposed Scenario estimates the Project's GHG emissions by accounting for credits and reductions for compliance with regulations and other programs aimed at reducing GHG emissions. Accordingly, the Project emission reductions account for Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS). However, early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on

potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

Further, the 2020 NAT scenario also considers State mandates that were already in place when CARB prepared the *Supplemental FED* in 2011 (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard). However, GHG reductions associated with the programs implemented after 2020 were not accounted for, which conservatively estimates the Project's GHG emissions. For example, the analysis did not account for SB 100 which provides additional RPS target of 44 percent by the year 2024. Further, it should be noted that GHG reductions due to LCFS are currently not incorporated into CalEEMod. The CalEEMod model incorporates EMFAC2014 emission factors which do not take into account the most recent 2017 LCFS updates. As a conservative assumption, GHG emissions reductions resulting from the LCFS updates were not included in the Project's emissions inventory.

The 2020 NAT scenario also does not consider site-specific conditions, Project design features, or prescribed mitigation measures. This methodology of comparing GHG emissions under these two scenarios is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein.

The 2020 NAT scenario is similar to the approach currently used by the City with respect to its evaluation of a proposed development project's consistency with CARB's Scoping Plans. Currently, the City evaluates the proposed project under two scenarios—one scenario without GHG reduction measures (akin to the 2020 NAT scenario) and a second scenario with GHG reduction measures.

Table 4.F-5 in the Draft EIR for the Project (p. 4.F-28) showed the emissions for the Project and its associated 2020 NAT scenario are estimated to be 8,720 and 13,030 MTCO_{2e} per year, respectively. That Table 4.F-5 is repeated below.

**Table 4.F-5
Estimated Annual Project CO₂e GHG Emissions (Metric Tons per Year)**

Scenario and Source	2020 NAT Scenario*	As Proposed Scenario	Reduction from 2020 NAT Scenario	Change from 2020 NAT Scenario
Area Sources	6	6	-	0%
Energy Sources	5,996	3,477	-2,518	-42%
Mobile Sources	6,011	4,220	-1,791	-30%
Waste Sources	222	222	-	0%
Water Sources	597	597	-	0%
Construction	198	198	-	0%
Total Emissions	13,030	8,720	-4,310	-33%
Net Emissions	-	6,512	N/A	N/A

Note: Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

** The 2020 NAT scenario did not assume 30% reduction in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures (2.8%); does not assume 42% reduction in energy production emissions from the state's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%). The 2020 NAT scenario also does not account for post-2020 reductions associated with more recent regulatory programs, such as the updated RPS target of 44 percent by the year 2024.*

Source: DKA Planning, 2018.

Those GHG emission figures do not reflect the existing GHG emissions from the existing Flower Market. Net emissions represent the difference between operational GHG emissions from the proposed Project and existing development on the Project Site. To arrive at net new emission figures, the existing emissions are subtracted from the GHG emissions attributable to the Project because the GHG emission figures for the Project account for the entirety of the Project, including the redeveloped portion of the Flower Market. To derive the net GHG emission figures, the existing GHG emissions of 2,208 MTCO₂e per year⁶ is subtracted from both Project scenarios in Table 4.F-5. New Table 4.F-5A below reflects the net new emission figures.⁷

⁶ The estimate of the existing GHG emissions attributable to the operation of the existing Flower Market is the same estimate provided in the Original Draft EIR.

⁷ The calculations supporting Tables 4.F-5 A through C are provided in Exhibit A to this report.

Table 4.F-5A
Net Operational GHG Emissions (Metric Tons per Year)
Estimated Annual Project CO₂e GHG Emissions (Metric Tons per Year)

Source	2020 NAT Scenario	As Proposed Scenario	Reduction from 2020 NAT Scenario	Change from 2020 NAT Scenario
Area Sources	6	6	-	0%
Energy Sources	5,996	3,477	-2,518	-42%
Mobile Sources	6,011	4,220	-1,791	-30%
Waste Sources	222	222	-	0%
Water Sources	597	597	-	0%
Construction	198	198	-	0%
Total Emissions	13,030	8,720	-4,310	-33%
Existing Emissions	-2,208	-2,208		
Net Emissions	10,822	6,512	-4,310	-40%

In addition, as predicted by the 2017 Scoping Plan and other studies, additional regulatory programs have been developed since the adoption of SB 32 and the 2017 Scoping Plan. Two of the more notable programs and their resulting reduction in GHG emissions are (a) a 20% reduction in GHG emissions attributable to energy sources due to compliance with 2019 Title 24 Energy Conservation Measures and (b) a 20% reduction in GHG emissions attributable to water sources due to compliance with advanced LADWP water consumption standards. Since the CalEEMod air quality model used in California to estimate project-level GHG emissions was developed in 2016, it folded in the energy efficiency standards at the time (i.e., 2016 California Building Standards Code or Title 24). The 2019 Title 24 standards contain more substantial energy efficiency requirements for new construction, emphasizing the importance of building design and construction flexibility to establish performance standards that substantially reduce energy consumption for water heating, lighting, and insulation for attics and walls. In addition, LADWP has adopted programs designed to reduce indoor water consumption and wastewater generation by 20 percent. These include the 2019 requirements for installation of the latest ultra-high efficiency plumbing fixtures, the 2016 standards that promote increasing water-resistant turf and incorporating rainfall capture techniques in project designs, aggressive outdoor water consumption programs through its landscape ordinance, and water recycling programs designed to increase recycled water to 59,000 acre-feet by 2035. New Table 4F-5B shows the Project emissions accounting for these two regulatory programs (which reduce the emissions in the Energy and Water Sources under the As Proposed Scenario).

Table 4.F-B
Estimated Annual Project CO₂e GHG Emissions (Metric Tons per Year)

Source	2020 NAT Scenario	As Proposed Scenario	Reduction from 2020 NAT Scenario	Change from 2020 NAT Scenario
Area Sources	6	6	-	0%
Energy Sources	5,996	2,782	-3,214	-54%
Mobile Sources	6,011	4,220	-1,791	-30%
Waste Sources	222	222	-	0%
Water Sources	597	478	-119	-20%
Construction	198	198	-	0%
Total Emissions	13,030	7,906	-5,124	-40%
Existing Emissions	-2,208	-2,208		
Net Emissions	10,822	5,698	-5,124	-47%

Finally, the 2020 NAT scenario used in the Draft EIR for the Project assumed the lower GHG emissions associated with the Project's profile as an urban infill, mixed-use development with proximity to substantial public transit, which would produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. As reflected in Table 4.F-6 in the Draft EIR (p. 4.F-29), the projected reductions in vehicle trips and VMT would range from 0-50 percent in reductions from pass-by trips, up to 20 percent for internal capture trips within the development, and up to 15 percent reductions from the substantial mode share from public transit. A key strategy in CARB's Scoping Plans for reducing GHG emissions is to encourage local land use authorities to approve such urban infill development adjacent to mass transit. Since the 2020 NAT scenario is a baseline scenario that does not assume implementation of such GHG reduction strategies, the 2020 NAT scenario assumes the Project is not developed as an urban infill project. If the GHG emission reductions from mobile sources associated with an urban infill project are not used in the 2020 NAT scenario, the GHG emissions in the Mobile Sources category in the 2020 NAT scenario would increase, as reflected in Table 4.F-5C below.

**Table 4F-5C
Estimated Annual Project CO₂e GHG Emissions (Metric Tons per Year)**

Source	2020 NAT Scenario	As Proposed Scenario	Reduction from 2020 NAT Scenario	Change from 2020 NAT Scenario
Area Sources	6	6	-	0%
Energy Sources	5,996	2,782	-3,214	-54%
Mobile Sources	10,801	4,220	-6,581	-61%
Waste Sources	222	222	-	0%
Water Sources	597	478	-119	-20%
Construction	198	198	-	0%
Total Emissions	17,820	7,906	-9,914	-56%
Existing Emissions	-2,208	-2,208		
Net Emissions	15,612	5,698	-9,914	-64%

Finally, it should also be noted that the GHG emission analyses reflected in Tables 4F.5 through 4.F-5C do not account for the GHG emissions attributable to all of the Project Design Features listed in the recirculated section of the Project's EIR concerning GHG impacts. While it can be difficult to quantify the GHG emissions attributable to all of those Project Design Features, those features will further reduce the Project's GHG emissions from the levels reflected in the above Tables.

3. Comment: SWAPE letter, Page 24. While SB 32 calls for Statewide GHG reductions of 40 percent below 1990 levels by 2030, SWAPE claims that SB 32 effectively requires the State to reduce 49 percent of statewide GHG emissions below "business-as-usual" levels. Further, SWAPE states that a 49 percent reduction target should be considered the threshold of significance against which to measure project impacts, yet acknowledges that "...this reduction percentage is applicable to statewide emissions, which is not directly applicable to a project-level analysis." Then, SWAPE suggests that additional analysis is needed to translate statewide targets into a project-specific threshold for evaluating GHG emissions.

Response: These claims are both factually inaccurate and inconsistent with State guidance on how operational GHG emissions should be evaluated. First, SWAPE's citation of SB 32's statewide 40 percent reduction targets correct cite the 2017 Scoping Plan's 1990 base year GHG inventory of 431 MMTCO₂e and the corresponding 40 percent reduction to 260 MMTCO₂e. However, SWAPE's assertion that this corresponds to a 49 percent reduction below "business-as-usual" levels based on a 2015 advocacy piece by Energy Innovation

Policy & Technology published two years before adoption of the Scoping Plan is flawed. This advocacy analysis does not even claim or let alone justify any 49 percent reduction below any BAU concept, rather focusing on necessary reductions with and without reserve allowances from the cap-and-trade program. Further, the 2017 Scoping Plan identifies a reduction of 33 percent of GHG reductions statewide from a BAU scenario (see summary Table 3 below).

**Table 3
2017 Scoping Plan’s Emissions Inventories**

Scenario	MMTCO ₂ e	Reduction
1990 Base Year	431	
2020 Target	431	
2030 BAU	389	-33%
2030 Target	260	-40%

Second, the 2017 Scoping Plan makes clear that any of its performance targets are statewide objectives meant to encompass the collective responsibility of all sectors that generate GHG emissions are not applicable for individual projects. Specifically, page 99 of the Scoping Plan states “[t]hese goals are appropriate for the plan level (city, county, subregional, or regional level, as appropriate), but not for specific individual projects because they include all emissions sectors in the State. No environmental agency tasked with control of air quality emissions has developed any bright line threshold of significance applicable to projects in the City of Los Angeles, let alone call for reductions below a BAU concept. Nevertheless, in an attempt to provide both disclosure and perspective on the Project’s GHG reductions from a base case scenario, Tables 4.F-5 through Table 4.F-5C show how the project’s energy and mobile source benefits would reduce GHG emissions when compared to a scenario where no State or local GHG measures were applied. Comparisons to these local plans and Statewide mandates are not used as the basis for any significance finding, but rather provide additional evidence and context for the DEIR’s finding that the Project is consistent with the AB 32 Scoping Plan and the 2016 RTP/SCS and now the SB 32 Scoping Plan.

EXHIBIT A

Source	Reduction	Source Category	Source Category Share of Emission Inventory
Area			
- No natural gas fireplaces	11.0%	Natural gas	50%
Total			5.5%
Energy			
- Compliance with 2019 Title 24 Energy Conservation Measures*	20.0%	Natural Gas	20.0%
Total			20.0%
Mobile			
- Mixed Use/Transit/Bike/Ped	35.0%	All trips	35.0%
- Pavley	30.0%	All net trips	19.5%
- Low Carbon Fuel Standards	7.2%	All net trips	4.7%
- Vehicle Efficiency Measures	2.8%	All net trips	1.8%
Total			61.0%
Waste			
Water/Wastewater			
- LADWP water consumption standards	20%	All water and wastewater	20.0%
Total			20.0%

* CalEEMod 2016.3.2 based on 2016 Title 24 Energy Use standards

Southern California Flower Market Project
 GHG Emissions Impact Compared to "No Action Taken" Scenario

Source	NAT (2022)	As Proposed (2022)	Reduction from NAT	Change from NAT
Area	6	6	-	0%
Energy	5,996	3,477	(2,518)	-42%
Mobile	6,011	4,220	(1,791)	-30%
Waste	222	222	-	0%
Water	597	597	-	0%
Construction	198	198	-	0%
Total Emissions	13,030	8,720	(4,310)	-33.1%
Existing Emissions	(2,208)	(2,208)		
Net Emissions	10,822	6,512	(4,310)	-39.8%

Southern California Flower Market Project
 GHG Emissions Impact Compared to "No Action Taken" Scenario (Energy Adjustments)

Source	NAT (2022)	As Proposed (2022)	Reduction from NAT	Change from NAT
Area	6	6	-	0%
Energy	5,996	2,782	(3,214)	-54%
Mobile	6,011	4,220	(1,791)	-30%
Waste	222	222	-	0%
Water	597	478	(119)	-20%
Construction	198	198	-	0%
Total Emissions	13,031	7,906	(5,124)	-39.3%
Existing Emissions	(2,208)	(2,208)		
Net Emissions	10,823	5,698	(5,124)	-47.3%

Southern California Flower Market Project
 GHG Emissions Impact Compared to "No Action Taken" Scenario (Mobile Adjustments)

Source	NAT (2022)	As Proposed (2022)	Reduction from NAT	Change from NAT
Area	6	6	-	0%
Energy	5,996	2,782	(3,214)	-54%
Mobile	10,801	4,220	(6,581)	-61%
Waste	222	222	-	0%
Water	597	478	(119)	-20%
Construction	198	198	-	0%
Total Emissions	17,820	7,906	(9,914)	-55.6%
Existing Emissions	(2,208)	(2,208)		
Net Emissions	15,612	5,698	(9,914)	-63.5%