

IV. Environmental Impact Analysis

E. Greenhouse Gas Emissions

1. Introduction

This section of this Draft EIR addresses the Project's estimated greenhouse gas (GHG) emissions generated by construction and operations, inclusive of mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project design. The analysis also addresses the consistency of the Project with applicable regulations, plans, and policies set forth by the State of California, South Coast Air Quality Management District (SCAQMD), Southern California Association of Governments (SCAG), and the City of Los Angeles (City) to reduce GHG emissions. The Project's potential contributions to global climate change are discussed. Details regarding the GHG analysis are provided in the Air Quality/Greenhouse Gas Emissions Technical Appendix (AQ/GHG Technical Appendix), which is attached as Appendix B of this Draft EIR.¹

2. Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however, current data increasingly indicates that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is currently one of the most important and widely debated scientific, economic and political issues in the United States and the World. The extent to which increased concentrations of GHGs have caused or will cause climate change and the appropriate actions to limit and/or respond to climate change are the subject of significant and rapidly evolving regulatory efforts at the federal and state levels of government.

GHGs are compounds in Earth's atmosphere which play a critical role in determining temperature near Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter Earth's atmosphere, but retain

¹ Equivalent mass of carbon dioxide (CO₂e) emissions are calculated using the global warming potential values from the Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (AR4).

some of the low frequency infrared energy, which is radiated back from Earth towards space, resulting in a warming of the atmosphere.

Not all GHGs possess the same ability to contribute to climate change; therefore, GHG contributions are commonly quantified in the units of equivalent mass of carbon dioxide (CO₂e), which are calculated by applying the applicable global warming potential (GWP) value to GHG-specific emissions in metric tons (MT) per year. GWP is one type of simplified index based upon radiative properties that is used to estimate the potential future impacts of emissions of different gases upon the climate system in a relative sense. GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO₂, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO₂. GWP ratios are available from the Intergovernmental Panel on Climate Change (IPCC), IPCC's Fourth Assessment Report (AR4).^{2,3} Compounds that are regulated as GHGs are discussed below.^{4,5}

Carbon Dioxide (CO₂): CO₂ is the most abundant GHG in the atmosphere and is primarily generated from the combustion of fossil fuel from stationary and mobile sources. CO₂ is the reference gas (GWP of 1) for determining the GWPs of other GHGs.⁶

Methane (CH₄): CH₄ is emitted from biogenic sources (i.e., resulting from the activity of living organisms), incomplete combustion in forest fires, anaerobic decomposition of organic matter in landfills, manure management, and leaks in natural gas pipelines. The GWP of CH₄ is 21 in the IPCC's Second Assessment Report (SAR) and 25 in the IPCC's AR4.⁷

Nitrous Oxide (N₂O): N₂O is produced by human-related sources including agricultural soil management, animal manure management, sewage treatment,

² Global warming potentials (GWPs) and associated CO₂e values were developed by IPCC, and published in its Second Assessment Report (SAR) in 1996. Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's SAR. The IPCC updated the GWP values based on the latest science in AR4. The California Air Resources Board (CARB) reports GHG emission inventories for California using the GWP values from the IPCC AR4. Therefore, the analysis below reflects the GWP values from IPCC AR4. Although the IPCC has released its Fifth Assessment Report (AR5) with updated GWPs, CARB reports the Statewide GHG inventory using the IPCC AR4 GWPs, which is consistent with international reporting standards.

³ IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, September 2007.

⁴ IPCC, Second Assessment Report, Working Group I: The Science of Climate Change, 1996.

⁵ IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, September 2007.

⁶ IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, Table 2.14, 2007.

⁷ IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, September 2007, Table 2.14.

mobile and stationary combustion of fossil fuel, adipic acid production, and nitric acid production. The GWP of N₂O is 310 in the IPCC SAR and 298 in the IPCC AR4.⁸

Hydrofluorocarbons (HFCs): HFC's are fluorinated compounds consisting of hydrogen, carbon, and fluorine, typically used as refrigerants in both stationary refrigeration and mobile air conditioning systems. The GWPs of HFCs ranges from 140 for HFC-152a to 11,700 for HFC-23 in the IPCC SAR and 124 for HFC-152a to 14,800 for HFC-23 in the IPCC AR4.⁹

Perfluorocarbons (PFCs): PFCs are fluorinated compounds consisting of carbon and fluorine, primarily created as a byproduct of aluminum production and semiconductor manufacturing. The GWPs of PFCs range from 6,500 to 9,200 in the IPCC SAR and 7,390 to 17,700 in the IPCC AR4.¹⁰

Nitrogen Trifluoride (NF₃): NF₃ is an inorganic, non-flammable, non-toxic odorless gas. NF₃ is used as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as a fluorine source in high power chemical lasers, in semiconductor manufacturing, and as an etchant gas in the electronic industry. The GWP of NF₃ is 17,200 in the IPCC AR4.¹¹

Sulfur Hexafluoride (SF₆): SF₆ is a fluorinated compound consisting of sulfur and fluoride, which is a colorless, odorless, nontoxic, nonflammable gas. SF₆ is most commonly used as an electrical insulator in high voltage equipment that transmits and distributes electricity. The GWP of SF₆ is 23,900 in the IPCC SAR and 22,800 in the IPCC AR4.¹²

a) Regulatory Framework

Federal, state, and local regulations pertaining to air quality include the following:

- Federal Clean Air Act
- Energy Independence and Security Act
- Executive Order 13432
- California Light-Duty Vehicle Greenhouse Gas Standards and Corporate Average Fuel Economy Standards

⁸ IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, September 2007, Table 2.14.

⁹ IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, September 2007, Table 2.14.

¹⁰ IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, September 2007, Table 2.14.

¹¹ IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, September 2007, Table 2.14.

¹² IPCC, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, September 2007, Table 2.14.

- AB 32 (California Global Warming Solutions Act of 2006) and SB 32 (Emissions Limit)
- Executive Order S-3-05
- Executive Order B-30-15
- Executive Order B-55-18
- Senate Bill 375
- Assembly Bill 1493
- Executive Order S-01-07
- Title 24 Building Energy Efficiency Standards
- Senate Bill 97
- Cap-and-Trade Program
- Center for Biological Diversity v. California Department of Fish and Wildlife
- Southern California Association of Governments 2020-2045 RTP/SCS
- South Coast Air Quality Management District
- L.A.'s Green New Deal (Sustainable City pLAn 2019)
- City of Los Angeles Green Building Code
- Transportation Assessment Guidelines

(1) Federal

The United States Environmental Protection Agency (USEPA) is responsible for implementing federal policy to address GHGs. The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States including programs that focus on energy efficiency, renewable energy, methane and other non-CO₂ gases, agricultural practices, and implementation of technologies to achieve GHG reductions. These programs focus on energy efficiency, renewable energy, methane and other non-CO₂ gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions (e.g., the Energy Star labeling of energy-efficient products), which encourage voluntary reductions by large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

(a) *Federal Clean Air Act*

In *Massachusetts v. Environmental Protection Agency* (2007) 549 U.S. 497, the United States Supreme Court held in April of 2007 that USEPA has statutory authority under Section 202 of the federal Clean Air Act (CAA) to regulate GHGs. The court did not hold that USEPA was required to regulate GHG emissions;

however, it indicated that the agency must decide whether GHGs cause or contribute to air pollution that is reasonably anticipated to endanger public health or welfare. On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA. USEPA adopted a Final Endangerment Finding for the six defined GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) on December 7, 2009. The Endangerment Finding is required before USEPA can regulate GHG emissions under Section 202(a)(1) of the CAA consistently with the United States Supreme Court decision. USEPA also adopted a Cause or Contribute Finding in which the USEPA Administrator found that GHG emissions from new motor vehicle and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. These findings do not, by themselves, impose any requirements on industry or other entities. However, these actions were a prerequisite for implementing GHG emissions standards for vehicles.

(b) Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014, and requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by USEPA and National Highway Traffic Safety Administration (NHTSA) actions described above, (i) establishing miles per gallon targets for cars and light trucks, and (ii) directing NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.¹³

¹³ A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

(c) *Executive Order 13432*

In 2007, in response to United States Supreme Court ruling on *Massachusetts v. Environmental Protection Agency*, Executive Order 13432 directed USEPA, along with the Departments of Transportation, Energy, and Agriculture, to initiate a regulatory process that responds to the Supreme Court's ruling. Executive Order 13432 sets goals in the areas of energy efficiency, acquisition, renewable energy, toxics reductions, recycling, sustainable buildings, electronics stewardship, fleets, and water conservation.

(d) *Light-Duty Vehicle Greenhouse Gas Standards and Corporate Average Fuel Economy Standards*

On May 19, 2009, President Obama announced a national policy for fuel efficiency and emissions standards in the United States auto industry. The adopted federal standard applied to passenger cars and light-duty trucks for model years 2012 through 2016. The rule surpassed the prior Corporate Average Fuel Economy (CAFE) standards and required an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO₂ per mile by model year 2016, based on USEPA calculation methods.¹⁴ These standards were formally adopted on April 1, 2010. In August 2012, standards were adopted for model year 2017 through 2025 passenger cars and light-duty trucks. By 2020, new vehicles are projected to achieve 41.7 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 213 grams of CO₂ per mile (Phase II standards). By 2025, vehicles to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO₂ per mile. According to USEPA, under these standards a model year 2025 vehicle would emit one-half of the GHG emissions from a model year 2010 vehicle.¹⁵ In 2017, USEPA recommended no change to the GHG standards for light-duty vehicles for model years 2022-2025.

In August 2018, USEPA and NHTSA proposed the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule that would, if adopted, maintain the CAFE and CO₂ standards applicable in model year 2020 for model years 2021 through 2026. The estimated CAFE and CO₂ standards for model year 2020 are 43.7 mpg and 204 grams of CO₂ per mile for passenger cars and 31.3 mpg and 284 grams of CO₂ per mile for light trucks, projecting an overall industry average of 37 mpg, as compared to 46.7 mpg under the standards issued in 2012. In September 2019,

¹⁴ The Corporate Average Fuel Economy standards are regulations in the United States, first enacted by Congress in 1975, to improve the average fuel economy of cars and light trucks. The United States Department of Transportation has delegated the National Highway Traffic Safety Administration as the regulatory agency for the Corporate Average Fuel Economy standards.

¹⁵ United States Environmental Protection Agency (USEPA), EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012.

USEPA published the final rule in the Federal Register.¹⁶ The USEPA also published the final rule for the One National Program on Federal Preemption of State Fuel Economy Standards that finalizes critical parts of the SAFE Vehicles Rule and makes clear that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates. In November 2019, California and 23 other states, environmental groups, and the cities of Los Angeles and New York, filed a petition with the United States Court of Appeals for the District of Columbia Circuit, for the USEPA to reconsider the published rule. The Court has not yet ruled on the lawsuit.

(2) State

California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State.

(a) *California Greenhouse Gas Reduction Targets*

(i) *AB 32 (California Global Warming Solutions Act of 2006) and SB 32 (Emissions Limit)*

In 2006, the California State Legislature adopted Assembly Bill (AB) 32 (codified in the California Health and Safety Code [HSC], Division 25.5 – California Global Warming Solutions Act of 2006), which focuses on reducing GHG emissions in California to 1990 levels by 2020. AB 32 defines GHGs as CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆, and represents the first enforceable Statewide program to limit emissions of these GHGs from all major industries with penalties for noncompliance. AB 32 further requires that reduction measures be technologically feasible and cost effective. Under AB 32, the California Air Resources Board (CARB) has the primary responsibility for reducing GHG emissions. AB 32 required CARB to adopt rules and regulations directing State actions that would achieve GHG emissions reductions equivalent to 1990 Statewide levels by 2020.

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill, AB 197, and both were signed by Governor Brown to update AB 32 and include an emissions reductions goal for the year 2030. SB 32 and AB 197 amend AB 32, and establish a new Statewide climate pollution reduction target of 40 percent below 1990 levels by 2030, and include provisions to ensure the benefits of State climate policies reach into disadvantaged communities.

(a) *Climate Change Scoping Plan (2008)*

A specific requirement of AB 32 was to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG

¹⁶ Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310-51363.

emission reduction by 2020 (Health and Safety Code Section 38561 (h)). CARB developed an AB 32 Climate Change Scoping Plan (2008 Scoping Plan) that contained strategies to achieve the 2020 emissions cap.¹⁷ The 2008 Scoping Plan was approved in 2008, and contains a mix of recommended strategies that combined direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to meet the 2020 Statewide GHG emission limit and initiate the transformations needed to achieve the State's long-range climate objectives.¹⁸

As required by AB 32, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was originally set at 427 million metric tons of CO₂e (MMTCO₂e) using the GWP values from the IPCC SAR. CARB also projected the State's 2020 GHG emissions under No-Action-Taken (NAT) conditions (i.e., emissions that would occur without any plans, policies, or regulations to reduce GHG emissions). CARB originally used an average of the State's GHG emissions from 2002 through 2004 and projected the 2020 levels at approximately 596 MMTCO₂e (using GWP values from the IPCC SAR). Therefore, under the original projections, the State must reduce its 2020 NAT emissions by approximately 28.4 percent in order to meet the 1990 target of 427 MMTCO₂e.

(b) First Update to the Climate Change Scoping Plan (2014)

The First Update to the Climate Change Scoping Plan (2014 Scoping Plan) was approved by CARB in May 2014 and built upon the 2008 Scoping Plan with new strategies and recommendations.¹⁹ CARB revised the target using the GWP values from the IPCC AR4, and determined that the 1990 GHG emissions inventory and 2020 GHG emissions limit is 431 MMTCO₂e. CARB also updated the State's 2020 NAT emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions required by regulation that were adopted for motor vehicles and renewable energy. CARB's projected Statewide 2020 emissions estimate using the GWP values from the IPCC AR4 is 509.4 MMTCO₂e.

Therefore, under the 2014 Scoping Plan, the emission reductions necessary to achieve the 2020 emissions target of 431 MMTCO₂e would be approximately 78.4 MMTCO₂e, or a reduction of GHG emissions by approximately 15.4 percent.

(c) 2017 Climate Change Scoping Plan

In response to the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan (2017 Scoping Plan) in December 2017.²⁰ The 2017

¹⁷ CARB, Climate Change Scoping Plan, December 2008.

¹⁸ CARB, Climate Change Scoping Plan, December 2008.

¹⁹ CARB, First Update to the Climate Change Scoping Plan, May 2014.

²⁰ CARB, California's 2017 Climate Change Scoping Plan, November 2017.

Scoping Plan outlines the strategies the State will implement to achieve the 2030 GHG reduction target, which build on the Cap-and-Trade Regulation, the low carbon fuel standard (LCFS), improved vehicle, truck and freight movement emissions standards, renewable energy standards, and strategies to reduce methane emissions from agricultural and other wastes by using it to meet California's energy needs.^{21,22} The 2017 Scoping Plan also comprehensively addresses GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. The adopted 2017 Scoping Plan includes ongoing and statutorily required programs and continuing the Cap-and-Trade Program. The 2017 Scoping Plan was modified from the January 2017 Proposed Scoping Plan to reflect AB 398, including removal of the 20-percent refinery measure.²³

CARB states that the 2017 Scoping Plan "is the best choice to achieve the State's climate and clean air goals."²⁴ Under the 2017 Scoping Plan, the majority of the reductions would result from the continuation of the Cap-and-Trade regulation. Additional reductions are achieved from electricity sector standards (i.e., utility providers to supply at least 50 percent renewable electricity by 2030), doubling the energy efficiency savings at end uses, additional reductions from the LCFS, implementing the short-lived GHG strategy (e.g., hydrofluorocarbons), and implementing the mobile source strategy and sustainable freight action plan. The alternatives to the 2017 Scoping Plan were designed to consider various combinations of these programs, as well as consideration of a carbon tax in the event the Cap-and-Trade regulation is not continued. However, in July 2017, the California Legislature voted to extend the Cap-and-Trade regulation to 2030.

The 2017 Scoping Plan discusses the role of local governments in meeting the State's GHG reductions goals because local governments have jurisdiction and land use authority related to: community-scale planning and permitting processes, local codes and actions, outreach and education programs, and municipal operations.²⁵ Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.²⁶

²¹ Refer to **Subsection IV.E.2.a)(2)(h), *Center for Biological Diversity v. California Department of Fish and Wildlife***, for a detailed description of the Cap-and-Trade Program.

²² Refer to **Subsection IV.E.2.a)(2)(e), *Senate Bill 97 (SB 97, Dutton) (Chapter 185, Statutes of 2007)***, for a detailed discussion of the low carbon fuel standard (LCFS).

²³ AB 398 was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program 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.

²⁴ CARB, California's 2017 Climate Change Scoping Plan, November 2017.

²⁵ CARB, California's 2017 Climate Change Scoping Plan, November 2017, page 97.

²⁶ CARB, California's 2017 Climate Change Scoping Plan, November 2017, page 97.

A summary of the GHG emissions reductions required under AB 32 is provided in **Table IV.E-1, *Estimated Greenhouse Gas Emissions Reductions Required by AB 32 and SB 32***.

**TABLE IV.E-1
ESTIMATED GREENHOUSE GAS EMISSIONS REDUCTIONS REQUIRED BY
AB 32 AND SB 32**

Emissions Scenario	GHG Emissions (MMTCO₂e)
2008 Scoping Plan (IPCC SAR)	
2020 NAT Forecast (CARB 2008 Scoping Plan Estimate)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
Reduction below NAT necessary to achieve 1990 levels by 2020	169 (28.4%) ^a
2014 Scoping Plan (GHG Estimates Updated in 2014 to Reflect IPCC AR4)	
2020 NAT Forecast (CARB 2014 Scoping Plan Estimate)	509.4
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	431
Reduction below NAT necessary to achieve 1990 levels by 2020	78.4 (15.4%) ^b
2017 Scoping Plan Update	
2030 NAT Forecast ("Reference Scenario" which includes 2020 GHG reduction policies and programs)	389
2030 Emissions Target Set by AB 32 (i.e., 40% below 1990 Level)	260
Reduction below NAT Necessary to Achieve 40% below 1990 Level by 2030	129 (33.2%) ^c

MMTCO₂e = million metric tons of carbon dioxide equivalents

^a $596 - 427 = 169 / 596 = 28.4\%$

^b $509.4 - 431 = 78.4 / 509.4 = 15.4\%$

^c $389 - 260 = 129 / 389 = 33.2\%$

SOURCE: CARB, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011; CARB, 2020 Business-as-Usual (BAU) Emissions Projection, 2014 Edition, 2017, <http://www.arb.ca.gov/cc/inventory/data/bau.htm>, accessed April 28, 2020; CARB, California's 2017 Climate Change Scoping Plan, November 2017.

Under the 2017 Scoping Plan, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34 to 79 MMTCO₂ of the 2030 reduction obligation.²⁷ The short-lived GHG strategy is expected to cover approximately 17 to 35 MMTCO₂e). The Renewables Portfolio Standard (RPS) with 50 percent renewable electricity by 2030 is expected to cover approximately

²⁷ CARB, California's 2017 Climate Change Scoping Plan, November 2017, Appendix G.

3 MMTCO₂. The mobile source strategy and sustainable freight action plan includes maintaining the existing vehicle GHG emissions standards, increasing the number of zero emission vehicles, and improving the freight system efficiency, which is expected to cover approximately 11 to 13 MMTCO₂. Under the 2017 Scoping Plan, CARB expects that the doubling of the energy efficiency savings by 2030 would cover approximately seven to nine MMTCO₂. The other strategies would be expected to cover the remaining 2030 reduction obligations.

(ii) *Executive Order S-3-05*

Governor Schwarzenegger announced on June 1, 2005, through Executive Order S-3-05, the following GHG emission reduction targets:²⁸

- By 2010, California shall reduce GHG emissions to 2000 levels;²⁹
- By 2020, California shall reduce GHG emissions to 1990 levels; and
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

In accordance with Executive Order S-3-05, the California Environmental Protection Agency (CalEPA) is required to coordinate efforts of various agencies, which comprise the California Climate Action Team (CAT), in order to collectively and efficiently reduce GHGs. These agencies include: CARB; the Secretary of the Business, Transportation and Housing Agency; Department of Food and Agriculture; the California Natural Resources Agency (CNRA); the California Energy Commission (CEC); and the Public Utilities Commission. The CAT provides periodic reports to the Governor and Legislature on the status of GHG reductions in the State as well as strategies for mitigating and adapting to climate change. In 2006, the first CAT Report contained recommendations and strategies to help meet the targets in Executive Order S-3-05. The 2010 CAT Report, finalized in December 2010, expands on the policies in the 2006 CAT Report.³⁰

(iii) *Executive Order B-30-15*

On April 29, 2015, Governor Brown issued Executive Order B-30-15, which involved the following:

- Established a new interim Statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.

²⁸ Center for Climate Strategies, Executive Order S-3-05.

²⁹ The 2010 target to reduce GHG emissions to 2000 levels was not met. Source: Rubin, Thomas A., Does California Really Need Major Land Use and Transportation Changes to Meet Greenhouse Gas Emissions Targets?, July 3, 2013, <https://reason.org/policy-brief/does-california-really-need-major/>, accessed April 28, 2020.

³⁰ California Environmental Protection Agency (CalEPA), Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, December 2010.

- Ordered all State agencies with jurisdiction over sources of GHG emissions to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 reduction targets.
- Directed CARB to update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent.

(iv) *Executive Order B-55-18*

Executive Order B-55-18 was signed by Governor Brown on September 10, 2018. The order establishes an additional Statewide policy to achieve carbon neutrality by 2045 and maintain net negative emissions thereafter. Executive Order B-55-18 directs CARB to work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal, and to ensure future Climate Change Scoping Plans identify and recommend measures to achieve the carbon neutrality goal.

(b) *Land Use and Transportation Planning*

(i) *Senate Bill 375*

SB 375 (Chapter 728, Statutes of 2008), which establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG, was adopted by the State on September 30, 2008. Under SB 375, CARB is required, in consultation with the State's Metropolitan Planning Organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. CARB first set regional per capita GHG emissions reduction targets on September 23, 2010 of eight percent by 2020 and 13 percent by 2035 relative to 2005 GHG emissions for SCAG, which is the MPO for the region in which the City is located.³¹ CARB updated SCAG's targets on March 22, 2018 to eight percent by 2020 and 19 percent by 2035 relative to 2005 GHG emissions. Of note, the proposed reduction targets explicitly exclude emission reductions expected from AB 1493 and LCFS.

Under SB 375, the reduction target must be incorporated within that region's Regional Transportation Plan (RTP), which is used for long-term transportation planning in the Sustainable Communities Strategy (SCS). Certain transportation planning and programming activities would then need to be consistent with the SCS; however, SB 375 expressly provides that the SCS does not regulate the use of land, and further provides that local land use plans and policies (e.g., general plan) are not required to be consistent with either the RTP or SCS.

On September 3, 2020, SCAG adopted the Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS),

³¹ Southern California Association of Governments (SCAG), Greenhouse Gases, <http://www.scag.ca.gov/programs/Pages/GreenhouseGases.aspx>, accessed January 20, 2021.

which is an update to the previous 2016-2040 RTP/SCS. Using growth forecasts and economic trends, the 2020-2045 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. The 2020-2045 RTP/SCS successfully achieves the GHG emission-reduction targets set by CARB (an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions).

(c) *Transportation Fuel*

(i) *Assembly Bill 1493*

In response to the transportation sector accounting for a large percentage of California's CO₂ emissions, AB 1493 (HSC Section 42823 and 43018.5) (also referred to as the Pavley standards), enacted on July 22, 2002, required CARB to set GHG emission standards for passenger vehicles, light duty trucks, and other vehicles whose primary use is non-commercial personal transportation manufactured in and after 2009. In setting these standards, CARB must consider cost effectiveness, technological feasibility, economic impacts, and provide maximum flexibility to manufacturers. The federal CAA ordinarily preempts state regulation of motor vehicle emission standards; however, California is allowed to set its own standards with a federal CAA waiver from the USEPA. In June 2009, USEPA granted California the waiver.

However, as discussed previously, USEPA and United States Department of Transportation (USDOT) adopted federal standards for model year 2012 through 2016 light-duty vehicles, which corresponds to the vehicle model years regulated under the State's Pavley Phase I standards. In August 2012, the USEPA and USDOT adopted GHG emission standards for model year 2017 through 2025 vehicles; however, these standards were rescinded and replaced under the SAFE Vehicles Rule as discussed above in **Subsection IV.E.2(1), Federal**. Prior to the SAFE Vehicles Rule, the standards corresponded to the vehicle model years regulated under the State's Pavley Phase II standards but differed slightly from the State's model year 2017 through 2025 standards. The State of California agreed not to contest the prior standards, in part, due to the fact that while the national standard would achieve slightly less reductions in California, it would achieve greater reductions nationally and is stringent enough to meet State GHG emission reduction goals. In 2012, CARB adopted regulations that allow manufacturers to comply with the prior 2017 through 2025 national standards to meet State law (i.e., the State's Pavley Phase II standards still apply by law; however, meeting the national standards prior to the SAFE Vehicles Rule for model year 2017 through 2025 also meets State law). As mentioned above in **Subsection IV.E.2(1), Federal**, in response to the SAFE Vehicles Rules and the One National Program on Federal Preemption of State Fuel Economy Standards, in November 2019, California and 23 other states, environmental groups, and the cities of Los Angeles and New York, filed a petition with the United States Court of Appeals for the

District of Columbia Circuit, for the USEPA to reconsider the published rule. The Court has not yet ruled on the lawsuit.

(ii) *Executive Order S-01-07*

In January 2007, Governor Brown enacted Executive Order S-01-07, which mandates the following: (1) establish a Statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) adopt an LCFS for transportation fuels in California. CARB identified the LCFS as one of the nine discrete early actions in the Climate Change Scoping Plan. In 2009, the LCFS regulations were approved by CARB and established a reduction in the carbon intensity of transportation fuels by 10 percent by 2020 with implementation beginning on January 1, 2011. In September 2015, CARB approved the re-adoption of the LCFS, which became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted. In April 2017, the LCFS was brought before the Court of Appeal challenging the analysis of potential nitrogen dioxide impacts from biodiesel fuels. The Court directed CARB to conduct an analysis of nitrogen dioxide impacts from biodiesel fuels and froze the carbon intensity targets for diesel and biodiesel fuel provisions at 2017 levels until CARB has completed this analysis. In September 2018, CARB issued its Final Supplemental Disclosure Discussion of Oxides of Nitrogen Potentially Caused by the Low Carbon Fuel Standard Regulation.³² Final approval of regulatory changes from CARB's analysis of nitrogen dioxide impacts from biodiesel fuels was made on January 4, 2019.³³ The 2017 Scoping Plan also calls for increasing the mandatory reduction in carbon intensity of transportation fuels from 10 percent to 18 percent by 2030.

(d) *Energy*

(i) *Title 24 Building Energy Efficiency Standards*

In 1978, the CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations [CCR], Title 24, Part 6) in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, the increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the CEC standards. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods. The Energy Efficiency Standards for Residential and Nonresidential Buildings focuses on several key areas to improve the energy efficiency of renovations and addition to existing buildings as well as newly constructed buildings and renovations and additions to existing buildings.

³² CARB, Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation, September 2018.

³³ CARB, Low Carbon Fuel Standard and Alternative Diesel Fuels Regulation, September 2018.

The major efficiency improvements to the residential standards involve improvements for attics, walls, water heating, and lighting, whereas the major efficiency improvements to the nonresidential standards include alignment with the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 national standards. Furthermore, the standards require that enforcement agencies determine compliance with CCR, Title 24, Part 6 before issuing building permits for any construction.³⁴

Part 11 of the Title 24 Building Energy Efficiency Standards is referred to as the California Green Building Standards (CALGreen) Code. The purpose of the CALGreen Code is to “improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality.”³⁵ The CALGreen Code is not intended to substitute for or be identified as meeting the certification requirements of any green building program that is not established and adopted by the California Building Standards Commission. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality.³⁶

The State has also adopted regulations to increase the proportion of electricity from renewable sources. In November 2008, Governor Schwarzenegger signed Executive Order S-14-08, which expanded the State's RPS to 33 percent renewable power by 2020.³⁷ On April 12, 2011, Governor Brown signed SB X1-2 to required California's RPS goals of 33 percent of electrical retail sales by 2020. On September 11, 2015, SB 350 (Chapter 547, Statutes of 2015) further increased the RPS to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027. On September 10, 2018, Governor Brown signed SB 100, which further increased California's RPS to achieve 50 percent renewable resources by December 31, 2026, and a 60-percent target by December 31, 2030, while requiring retail sellers and local publicly owned electric utilities to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030; and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045.

³⁴ California Energy Commission (CEC), 2019 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, December 2018.

³⁵ California Building Standards Commission, 2010 California Green Building Standards Code, November 2010.

³⁶ California Building Standards Commission, 2010 California Green Building Standards Code, November 2010.

³⁷ See generally 17 California Code of Regulations (CCR) Sections 95811, 95812.

(e) *Senate Bill 97*

In 2007, SB 97 (Chapter 185, Statutes of 2007) directed the State Office of Planning and Research (OPR) to develop California Environmental Quality Act (CEQA) Guidelines (CEQA Guidelines) “for the mitigation of GHG emissions or the effects of GHG emissions.” In December 2009, OPR adopted amendments to the CEQA Guidelines, (Guidelines Amendments), Appendix G, Environmental Checklist, which created a new resource section for GHG emissions and indicated criteria that may be used to establish significance of GHG emissions.³⁸

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the Guidelines Amendments. The Guidelines Amendments require a lead agency to make a good-faith effort, based on scientific and factual data to the extent possible, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency, and allow the lead agency to choose whether to: (1) quantify GHG emissions resulting from a project; and/or (2) rely on a qualitative analysis or performance-based standards. Furthermore, the Guidelines Amendments identify three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies “that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act’s requirements for cumulative impact analysis.”³⁹

(f) *Cap-and-Trade Program*

The Climate Change Scoping Plan identifies a Cap-and-Trade Program as a key strategy CARB will employ to help California meet its GHG reduction targets for 2020 and 2030, and ultimately achieve an 80-percent reduction from 1990 levels by 2050. Pursuant to its authority under AB 32, CARB has designed and adopted a California Cap-and-Trade Program to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on Statewide GHG emissions and employing

³⁸ 14 CCR Section 15064.4.

³⁹ Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.

market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020.⁴⁰ Under Cap-and-Trade Program, an overall limit is established for GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, cement production, and large industrial facilities that emit more than 25,000 metric tons CO₂e per year) and declines over time, and facilities subject to the cap can trade permits to emit GHGs. The Statewide cap for GHG emissions from the capped sectors commenced in 2013 and declines over time, achieving GHG emission reductions throughout the Program's duration.⁴¹ On July 17, 2017, the California legislature passed AB 398, extending the Cap-and-Trade Program through 2030.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 Statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade Program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on an accumulative basis. In other words, as climate change is a global occurrence and the effects of GHG emissions are considered cumulative in nature, a focus on aggregate GHG emissions reductions, rather than source-specific reductions, is warranted.

If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

(g) California Air Resources Board

CARB, a part of CalEPA, is responsible for the coordination and administration of both federal and State air pollution control programs within California. Some of the regulations and measures that CARB has adopted to reduce particulate matter, nitrogen oxides, and other emissions have co-benefits of reducing GHG emissions. Regulations and measures include:

- In 2004, CARB adopted an Airborne Toxic Control Measure (ACTM) to limit diesel-fueled commercial motor vehicle idling in order to reduce public exposure to diesel particulate matter and other toxic air contaminants (Title 13 CCR, Section 2485). This measure generally does not allow diesel-fueled commercial vehicles to idle for more than five (5) minutes at any given location with certain exemptions for equipment in which idling is a necessary function such as concrete trucks.

⁴⁰ 17 CCR Sections 95800 to 96023.

⁴¹ See generally 17 CCR Sections 95811, 95812.

- In 2008, CARB approved the Truck and Bus regulation to reduce particulate matter and nitrogen oxide emissions from existing diesel vehicles operating in California (Title 13 CCR, Section 2025, subsection (h)).
- In 2007, CARB promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower, such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The standards aim to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models.

While these regulations primarily target reductions in criteria air pollutant emission, they have co-benefits of minimizing GHG emissions due to improved engine efficiencies and reduction of idling times.

(h) *Center for Biological Diversity v. California
Department of Fish and Wildlife*

The California Supreme Court considered the CEQA issue of determining the significance of GHG emissions in its decision, *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming* (2015) 62 Cal. 4th 204. The Court questioned a common CEQA approach to GHG analyses for development projects that compares project emissions to the reductions from NAT that will be needed Statewide to reduce emissions to 1990 levels by 2020, as required by AB 32. The Court upheld the NAT method as a valid approach, but concluded that the NAT method was improperly applied for the Newhall project because the emissions target for the project was incorrectly deemed consistent with the Statewide emission target of a percent below NAT for the year 2020, as specified in the AB 32 Scoping Plan. In other words, the Court said that the percent below NAT target specified in the AB 32 Scoping Plan is intended as a measure of the GHG reduction effort required by the State as a whole, and it cannot necessarily be applied to the impacts of a specific project in a specific location, particularly where the record did not show that the Newhall project had been assumed or considered in the AB 32 Scoping Plan.

The Court provided some guidance to evaluating the cumulative significance of a proposed land use project's GHG emissions but noted that none of the approaches could be guaranteed to satisfy CEQA for a particular project. The Court did not require that projects must rely on the Court's guidance in an analysis. However, this Draft EIR considers the potential GHG emissions associated with the Project within the context of the Court's guidance.

The Court also addressed project-level GHG emission inventories in the context of Statewide GHG emission inventories and reduction goals. If a project-level inventory were to include additional upstream embedded emissions associated with consumption of goods and services, or downstream transportation emissions, outside of the State, it would no longer be comparable to the State inventory and

a threshold based on State reduction targets could not be used to evaluate the project's GHG emissions. Given the California Supreme Court's determination that it is appropriate under CEQA to compare project GHG emissions to a threshold related to the State reduction goals, there is no logical rationale to include GHG emissions in a CEQA project inventory if they are not included in the State's GHG inventory, nor to use methodologies to account for emissions different from those employed in the State's GHG inventory."⁴² Thus, consistent with the Court's ruling, a project-level GHG emissions inventory under CEQA need not include additional upstream embedded emissions or downstream emissions to maintain consistency with the Statewide GHG emission inventory methodology.

(3) Regional

(a) *Southern California Association of Governments 2020-2045 RTP/SCS*

On September 3, 2020, the SCAG's Regional Council formally adopted the 2020–2045 RTP/SCS, which is an update to the previous 2012-2035 RTP/SCS and 2016-2040 RTP/SCS.⁴³ Using growth forecasts and economic trends, the 2020-2045 RTP/SCS provides a vision for transportation throughout the region for the next 25 years. It considers the role of transportation in the broader context of economic, environmental, and quality-of-life goals for the future, identifying regional transportation strategies to address mobility needs. The 2020-2045 RTP/SCS describes how the region can attain the GHG emission-reduction targets set by CARB by achieving an eight percent reduction in per capita transportation GHG emissions by 2020 and 19 percent reduction in per capita transportation GHG emissions by 2035 compared to the 2005 level on a per capita basis.⁴⁴ Compliance with and implementation of 2020-2045 RTP/SCS policies and strategies would have co-benefits of reducing per capita criteria air pollutant emissions (e.g. nitrogen dioxide, carbon monoxide, etc.) associated with reduced per capita vehicle miles traveled (VMT).

The 2020-2045 RTP/SCS states that the SCAG region was home to approximately 18.8 million people in 2016 and included approximately six million homes and 8.4 million jobs.⁴⁵ By 2045, the integrated growth forecast projects that these figures will increase by 3.7 million people, with approximately 1.6 million more homes and 1.7 million more jobs. High Quality Transit Areas (HQTAs), which are defined by

⁴² Association of Environmental Professionals, Draft AEP White Paper - Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implications for CEQA and Climate Action Plans, August 2017, page 1-7.

⁴³ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020.

⁴⁴ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020.

⁴⁵ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Demographics and Growth Forecast Technical Report, September 2020.

the 2020-2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, will account for 2.4 percent of regional total land, but are projected to accommodate 51 percent and 60 percent of future household growth respectively between 2016 and 2045.^{46,47} The 2020-2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

SCAG's 2020-2045 RTP/SCS provides specific strategies for implementation. These strategies include supporting projects that encourage a diverse job opportunities for a variety of skills and education, recreation and cultures and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles (EV), movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.⁴⁸

In addition, the 2020-2045 RTP/SCS includes strategies to support local planning and projects that serve short trips, promote transportation investments, investments in active transportation, more walkable and bikeable communities, that will result in improved air quality and public health, and reduced greenhouse gas emissions, and supports building physical infrastructure such as local and regional bikeways, sidewalk and safe routes to schools pedestrian improvements, regional greenways and first-last mile connections to transit, including to light rail and bus stations. The 2020-2045 RTP/SCS proposes to better align active transportation investments with land use and transportation strategies, increase competitiveness of local agencies for federal and state funding, and to expand the potential for all people to use active transportation. CARB has accepted the SCAG determination that the 2020-2045

⁴⁶ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, page 51.

⁴⁷ The Project Site is also located in a Transit Priority Area (TPA), which is defined as an area within 0.5-mile of a major transit stop that is existing or planned. A "major transit stop" is defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

⁴⁸ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, pages 48-86.

RTP/SCS, when implemented, would meet the applicable 2035 GHG emission reduction targets for automobiles and light trucks established by CARB.^{49,50}

Although there are GHG emission reduction targets for passenger vehicles set by CARB for 2045, the 2020-2045 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2045. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an additional 4.1-percent reduction in GHG from transportation-related sources in the ten years between 2035 and 2045, the 2020-2045 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the State's GHG emission reduction goals.⁵¹

(b) South Coast Air Quality Management District

The Project Site is located in the South Coast Air Basin (Air Basin), which consists of Orange County, Los Angeles County (excluding the Antelope Valley portion), and the western, non-desert portions of San Bernardino and Riverside Counties, in addition to the San Geronio Pass area in Riverside County. SCAQMD is responsible for air quality planning in the Air Basin and developing rules and regulations to bring the area into attainment of the ambient air quality standards.

SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:⁵²

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

⁴⁹ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, pages 48-86.

⁵⁰ CARB, Executive Order G-20-239 and CARB Evaluation Packet of SCAG's 2020 RTP/SCS, October 30, 2020.

⁵¹ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy Public Health Technical Report, September 2020, page 53.

⁵² South Coast Air Quality Management District (SCAQMD), CEQA Air Quality Handbook, April 1993, page 3-7.

A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.⁵³ In 2008, the Working Group released draft guidance regarding interim CEQA GHG significance thresholds.^{54,55,56} Within its October 2008 document, the Working Group proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO₂e (MTCO₂e) per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂e per year would be assumed to have a less-than-significant impact on climate change. In addition, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO₂e for stationary source/industrial projects where SCAQMD is the Lead Agency. However, SCAQMD has not adopted a GHG significance threshold for land use development projects (e.g., mixed-use/commercial projects). The aforementioned Working Group has been inactive since 2011 and the SCAQMD has not formally adopted any GHG significance threshold for land use development projects.

(4) Local

(a) *L.A.'s Green New Deal (Sustainable City pLAn 2019)*

In April 2019, Mayor Eric Garcetti released L.A.'s Green New Deal (Sustainable City pLAn 2019) (herein referred to as the Green New Deal). Rather than an adopted plan, the Green New Deal is a mayoral initiative that consists of a program of actions designed to create sustainability-based performance targets through 2050 that advance economic, environmental, and equity objectives.⁵⁷ The Green New Deal is the first four-year update to the City's first Sustainable City pLAn released in 2015. It augments, expands, and elaborates in even more detail the City's vision for a sustainable future and it addresses climate emergency with accelerated targets and new aggressive goals.

While not a plan adopted solely to reduce GHG emissions, within the Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals, which include reducing GHG emissions through near-term outcomes:

⁵³ SCAQMD, Greenhouse Gases CEQA Significance Thresholds, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds>, accessed April 28, 2020.

⁵⁴ SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, Attachment E, October 2008.

⁵⁵ SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, <http://www3.aqmd.gov/hb/2008/December/0812ag.html>, accessed April 28, 2020.

⁵⁶ SCAQMD, Greenhouse Gases, CEQA Significance Thresholds, Board Letter – Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008. The performance standards primarily focus on energy efficiency measures beyond Title 24 and a screening level of 3,000 MTCO₂e per year for residential and commercial sector projects. The SCAQMD adopted a GHG significance threshold of 10,000 MTCO₂e per year for industrial stationary source projects for which SCAQMD is the lead agency.

⁵⁷ City of Los Angeles, LA's Green New Deal, 2019.

- Reduce potable water use per capita by 22.5 percent by 2025, 25 percent by 2035, and maintain or reduce 2035 per capita water use through 2050.
- Reduce building energy use per square feet for all building types 22 percent by 2025, 34 percent by 2035, and 44 percent by 2050 (from a baseline of 68 million British thermal units (mBTU)/square feet in 2015).
- All new buildings will be net zero carbon by 2030, and 100 percent of all buildings will be net zero carbon by 2050.
- Increase cumulative new housing unit construction to 150,000 by 2025, and 275,000 units by 2035.
- Ensure 57 percent of new housing units are built within 1,500 feet of transit by 2025; and 75 percent by 2035.
- Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.
- Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.
- Increase the percentage of electric and zero emission vehicles to 25 percent by 2025, 80 percent by 2035, and 100 percent by 2050.
- Increase landfill diversion rate to 90 percent by 2025, 95 percent by 2035, and 100 percent by 2050.
- Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).
- Eliminate organic waste going to landfill by 2028.
- Reduce urban/rural temperature differential by at least 1.7 degrees by 2025, and 3 degrees by 2035.
- Ensure proportion of Angelenos living within 1/2 mile of a park or open space is at least 65 percent by 2025, 75 percent by 2035, and 100 percent by 2050.

(b) *City of Los Angeles Green Building Code*

In April 2008, the City adopted the Green Building Program Ordinance to address the impacts of new development. In 2019, Chapter IX, Article 9, of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, was amended to incorporate various provisions of the CALGreen Code. The Los Angeles Green Building Code includes mandatory requirements and elective measures for three categories of buildings: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alternations to residential and non-residential buildings. The 2019 Title 24 standards became effective on January 1, 2020. The City of Los Angeles has not adopted the latest standards proposed by the CEC, the 2022 Building Energy Efficiency Standards. The proposed standards are anticipated to be considered for

adoption in 2021, with an effective date of January 1, 2023. The analysis below reflects consistency with the 2019 Title 24 standards.

(c) *Transportation Assessment Guidelines*

The City of Los Angeles Department of Transportation (LADOT) developed the City Transportation Assessment Guidelines (TAG) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation assessment study.⁵⁸ The TAG establishes the reduction of vehicle trips and VMT as the threshold for determining transportation impacts, and, thus, is an implementing mechanism of the City's strategy to reduce land use transportation-related GHG emissions consistent with AB 32, SB 32, and SB 375.

b) Existing Conditions

(1) Existing Statewide Greenhouse Gas Emissions

CARB compiles GHG inventories for the State of California. Based on the year 2018 GHG inventory data (the latest year for which data are available), California emitted 425.3 million metric tons of CO₂e (MMTCO₂e) which includes emissions resulting from imported electrical power.⁵⁹ Between 1990 and 2018, the population of California grew by approximately 9.7 million (from 29.8 to 39.6 million).^{60,61} This represents an increase of approximately 33 percent from 1990 population levels. In addition, the California economy, measured as gross state product, grew from \$773 billion in 1990 to \$2.99 trillion in 2018, representing an increase of almost four times the 1990 gross state product.⁶² Despite the population and economic growth, California's net GHG emissions were reduced to below 1990 levels in 2016. According to CARB, the declining trend coupled with the state's GHG reduction programs (such as the Renewables Portfolio Standard, LCFS, vehicle efficiency standards, and declining caps under the Cap and Trade Program) demonstrate that California is on track to meet the 2020 GHG reduction target codified in HSC, Division 25.5, also known as AB 32 and amended by SB 32.⁶³ **Table IV.E-2, State of California Greenhouse Gas Emissions**, identifies and quantifies Statewide

⁵⁸ Los Angeles Department of Transportation (LADOT), Transportation Assessment Guidelines, July 2020.

⁵⁹ CARB, California Greenhouse Gas Inventory for 2000-2018 — by Category as Defined in the 2008 Scoping Plan, October 15, 2020.

⁶⁰ United States Census Bureau, National and State Population Estimates: 1990-1994, 1995.

⁶¹ California Department of Finance, E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011-2020, with 2010 Benchmark, http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/documents/E-5_2020_Internet_Version.xlsx, accessed December 30, 2020.

⁶² California Department of Finance, Gross State Product (GDP), 1963 to 2019, http://www.dof.ca.gov/Forecasting/Economics/Indicators/Gross_State_Product/documents/CA_GDP.xlsx, accessed December 30, 2020. Amounts are based on current dollars as of the date of the report (April 2020).

⁶³ CARB, Frequently Asked Questions for the 2016 Edition California Greenhouse Gas Emission Inventory, 2016.

anthropogenic GHG emissions and sinks (e.g., carbon sequestration due to forest growth) in 1990 and 2018 (i.e., the most recent year in which data are available from CARB). As shown in Table IV.E-2, the transportation sector is the largest contributor to Statewide GHG emissions at approximately 40 percent in 2018.

TABLE IV.E-2
STATE OF CALIFORNIA GREENHOUSE GAS EMISSIONS

Category	Total 1990 Emissions using IPCC SAR (MMTCO₂e)	Percent of Total 1990 Emissions	Total 2018 Emissions using IPCC AR4 (MMTCO₂e)*	Percent of Total 2018 Emissions*
Transportation	150.7	35%	169.5	40%
Electric Power	110.6	26%	63.1	15%
Commercial	14.4	3%	25.7	6%
Residential	29.7	7%	15.6	4%
Industrial	103.0	24%	89.2	21%
Recycling and Waste ^a	—	—	9.1	2%
High GWP/Non-Specified ^b	1.3	<1%	20.5	5%
Agriculture/Forestry	23.6	6%	32.6	8%
Forestry Sinks	-6.7	--	-- ^c	--
Net Total (IPCC SAR)	426.6	100%	--	--
Net Total (IPCC AR4) ^d	431	100%	425.3	100%

* Totals may not add up exactly due to rounding.

^a Included in other categories for the 1990 emissions inventory.

^b High GWP gases are not specifically called out in the 1990 emissions inventory.

^c Revised methodology under development (not reported for 2015).

^d CARB revised the State's 1990 level GHG emissions using GWPs from the IPCC AR4.

SOURCES: CARB, Staff Report – California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, 2007; CARB, California Greenhouse Gas Inventory for 2000-2018 — by Category as Defined in the 2008 Scoping Plan, 2020.

(2) Existing Project Site Greenhouse Gas Emissions

The Project Site is currently developed with a 5,738-square-foot vacant educational building, an existing 8,225-square-foot Big 5 Sporting Goods store and associated surface parking.⁶⁴ These existing uses would be demolished and removed to allow for development of the Project. GHG emissions are currently associated with vehicle trips to and from the Project Site, on-site combustion of natural gas for heating, off-

⁶⁴ The 5,738 square foot vacant building previously housed the Montessori Children's World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

site combustion of fossil fuels for electricity, and off-site emissions from solid waste decomposition, water conveyance, and wastewater treatment.

CalEEMod was used to estimate GHG emissions from electricity, natural gas, solid waste, water and wastewater, and landscaping equipment. Building electricity and natural gas usage rates are adjusted to account for prior Title 24 Building Energy Efficiency Standards.⁶⁵ Mobile source emissions have been estimated based on CARB's on-road vehicle emissions factor (EMFAC2017) model. A detailed discussion of the methodology used to estimate the existing Project Site emissions reported below is provided in **Subsection IV.E.3.b), Methodology**.

Existing operational emissions for the Project Site are presented in **Table IV.E-3, Estimated Existing Project Site Greenhouse Gas Emissions**. Details regarding the calculation of the existing Project Site emissions are provided in Appendix B of this EIR.

TABLE IV.E-3
ESTIMATED EXISTING PROJECT SITE GREENHOUSE GAS EMISSIONS

Emissions Sources	CO₂e (Metric Tons per Year) ^{a,b}
Existing Operational	
On Road Mobile Sources	312
Area	<1
Energy (Electricity and Natural Gas)	63
Water Conveyance and Wastewater Treatment	<1
Solid Waste	3
Existing Total GHG Emissions	380

^a Totals may not add up exactly due to rounding in the modeling calculations

^b CO₂e emissions are calculated using the global warming potential values from the IPCC AR4. Although IPCC has released AR5 with updated GWPs, CARB reports the Statewide GHG inventory using the IPCC AR4 GWPs, which is consistent with international reporting standards.

SOURCE: ESA, 2020.

(3) Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation,

⁶⁵ CARB, CalEEMod User's Guide For CalEEMod Version 2016.3.2, Appendix E, Section 5, September 2016. Factors for the prior Title 24 standard are extrapolated based on the technical source documentation.

and changes in oceanic circulation. Due to the complexity of Earth's climate system and inability to accurately model it, the uncertainty surrounding climate change may never be completely eliminated. Nonetheless, the IPCC, in its Fifth Assessment Report (AR5), Summary for Policy Makers, stated that, "it is *extremely likely* that more than half of the observed increase in global average surface temperature from 1951 to 2010 was caused by the anthropogenic increase in greenhouse gas concentrations and other anthropogenic forcings [*sic*] together."⁶⁶ A report from the National Academy of Sciences concluded that 97 to 98 percent of the climate researchers most actively publishing in the field support the tenets of the IPCC in that climate change is very likely caused by human (i.e., anthropogenic) activity.⁶⁷

According to CARB, the potential impacts in California due to global climate change may include: loss in snow pack; sea level rise; more extreme heat days per year; more high ozone days; more large forest fires; more drought years; increased erosion of California's coastlines and sea water intrusion into the Sacramento and San Joaquin Deltas and associated levee systems; and increased pest infestation.⁶⁸ Below is a summary of some of the potential effects that could be experienced in California as a result of global warming and climate change.

(a) Air Quality

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State.⁶⁹ However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

⁶⁶ IPCC, Fifth Assessment Report, Summary for Policy Makers, 2013, page 5.

⁶⁷ Anderegg, William R. L., J.W. Prall, J. Harold, S.H., Schneider, Expert Credibility in Climate Change, Proceedings of the National Academy of Sciences of the United States of America. 2010;107:12107-12109.

⁶⁸ CalEPA, Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

⁶⁹ CalEPA, Preparing California for Extreme Heat: Guidance and Recommendations, October 2013.

In 2009, the CNRA published the California Climate Adaptation Strategy as a response to Executive Order S-13-2008.⁷⁰ The CNRA report lists specific recommendations for State and local agencies to best adapt to the anticipated risks posed by a changing climate. In accordance with the California Climate Adaptation Strategy, the CEC was directed to develop a website on climate change scenarios and impacts that would be beneficial for local decision makers.⁷¹ In 2011, CEC developed the website, known as Cal-Adapt, a web-based climate adaptation tool, which became operational in 2011.⁷² The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea-level rise, snowpack) from a variety of scenarios and models, which illustrate how climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the portion of Los Angeles in which the Project Site is located could result in an average increase in temperature of approximately 4.7°F to 7.4°F by 2070–2099, compared to the baseline 1961–1990 period of 73.3°F, a potential increase of approximately six to 10 percent.⁷³ Data suggest that the predicted future increase in temperatures as a result of climate change could potentially interfere with efforts to control and reduce ground-level ozone in the region.

(b) *Water Supply*

Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, “Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change.”⁷⁴ For example, some studies identify little change in total annual precipitation in projections for California while others show significantly more precipitation.⁷⁵ Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full.⁷⁶ Conversely, a

⁷⁰ California Natural Resources Agency (CNRA), Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

⁷¹ CNRA, Climate Action Team, 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008, 2009.

⁷² The Cal-Adapt website address is: <http://cal-adapt.org>.

⁷³ Cal-Adapt, Annual Average Maximum Temperatures for the portion of the City of Los Angeles in which the Project Site is located (Grid Cell 38.58, -121.46), <https://cal-adapt.org/tools/annual-averages/>, accessed April 28, 2020.

⁷⁴ Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

⁷⁵ Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

⁷⁶ Pacific Institute for Studies in Development, Environment and Security, Climate Change and California Water Resources: A Survey and Summary of the Literature, July 2003.

reduced snowpack coupled with increased rainfall during winters could lead to reductions in spring runoff and higher evapotranspiration because of higher temperatures could reduce the amount of water available for recharge.⁷⁷

The California Department of Water Resources report on climate change and effects on the State Water Project, the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that “climate change will likely have a significant effect on California’s future water resources...[and] future water demand.” It also reports that “much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain.”⁷⁸ In addition, it reports that the relationship between climate change and its potential effect on water demand is not well understood, but “[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future.” Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows.⁷⁹ In its AR5, the IPCC states “Changes in the global water cycle in response to the warming over the 21st century will not be uniform. The contrast in precipitation between wet and dry regions and between wet and dry seasons will increase, although there may be regional exceptions.”⁸⁰

(c) *Hydrology and Sea Level Rise*

As discussed above, climate change could potentially affect: the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of seawater as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California’s water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

⁷⁷ Pacific Institute for Studies in Development, Environment and Security, *Climate Change and California Water Resources: A Survey and Summary of the Literature*. July 2003.

⁷⁸ California Department of Water Resources, *Progress on Incorporating Climate Change into Planning and Management of California’s Water Resources*, July 2006, page 2-54.

⁷⁹ California Department of Water Resources, *Progress on Incorporating Climate Change into Planning and Management of California’s Water Resources*, July 2006, page 2-75.

⁸⁰ IPCC, *Fifth Assessment Report, Summary for Policy Makers*, 2013, page 20.

(d) *Agriculture*

California has a \$30-billion agricultural industry that produces half the country's fruits and vegetables. Higher CO₂ levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.⁸¹

(e) *Ecosystems and Wildlife*

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise by 2 to 11.5°F (1.1 to 6.4°C) by 2100, with significant regional variation.⁸² Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as two feet along most of the U.S. coastline. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage.⁸³

3. Project Impacts

a) Thresholds of Significance

(1) CEQA Guidelines Appendix G

In accordance with Appendix G of the CEQA Guidelines, a project would have a significant impact related to GHGs if it would:

Threshold (a): Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or

Threshold (b): Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

⁸¹ California Climate Change Center, *Our Changing Climate: Assessing the Risks to California*, July 2006.

⁸² National Research Council, *Advancing the Science of Climate Change*, 2010.

⁸³ Parmesan, C., and H. Galbraith, *Observed Impacts of Global Climate Change in the U.S.*, Prepared for the Pew Center on Global Climate Change, November 2004.

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. CEQA Guidelines Section 15064.4 gives lead agencies the discretion to determine whether to assess those emissions quantitatively or qualitatively. If a qualitative analysis is used, in addition to quantification, this section recommends certain qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments to CEQA Guidelines Section 15064.4 do not establish a threshold of significance; rather, lead agencies are granted discretion to establish significance thresholds for their respective jurisdictions, including looking to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), so long as any threshold chosen is supported by substantial evidence (refer to CEQA Guidelines Section 15064.7(c)).

CNRA has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and that they should be analyzed in the context of CEQA's requirements for cumulative impact analysis (refer to CEQA Guidelines Section 15064(h)(3)).⁸⁴

Although GHG emissions can be quantified, as discussed under **Subsection IV.E.3.b, Methodology**, CARB, SCAQMD, and the City have not adopted quantitative project-level significance thresholds for GHG emissions that would be applicable to the Project. OPR released a technical advisory on CEQA and climate change that provided some guidance on assessing the significance of GHG emissions, and states that "lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice," and that while "climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment."⁸⁵ Furthermore, the technical advisory states that "CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than

⁸⁴ See generally California Natural Resources Agency, Final Statement of Reasons for Regulatory Action, December 2009, pages 11-13, 14, and 16; see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.

⁸⁵ Governor's Office of Planning and Research (OPR), Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 2008.

significant level as a means to avoid or substantially reduce the cumulative impact of a project.”⁸⁶

As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.⁸⁷ To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.⁸⁸ Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions.”⁸⁹

Thus, CEQA Guidelines Section 15064(h)(3) allows a Lead Agency to make a finding of non-significance for GHG emissions if a project complies with a program and/or other regulatory schemes to reduce GHG emissions.⁹⁰

CARB’s 2017 Scoping Plan, SCAG’s 2020-2045 RTP/SCS, the City’s Green New Deal, and the Los Angeles Green Building Code all apply to the Project and are all intended to reduce GHG emissions to meet the Statewide targets set forth in AB 32 and amended by SB 32. Thus, in the absence of any adopted quantitative

⁸⁶ Governor’s OPR, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 2008.

⁸⁷ 14 CCR Section 15064(h)(3).

⁸⁸ 14 CCR Section 15064(h)(3).

⁸⁹ 14 CCR Section 15064(h)(3).

⁹⁰ See, for example, San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB’s GHG Cap-and-Trade Regulation, APR-2025 (June 25, 2014), in which the SJVAPCD “determined that GHG emissions increases that are covered under ABR’s Cap-and-Trade regulation cannot constitute significant increases under CEQA...” Furthermore, SCAQMD has taken this position in CEQA documents it has produced as a Lead Agency. SCAQMD has prepared 3 Negative Declarations and one Draft Environmental Impact Report that demonstrate SCAQMD has applied its 10,000 MTCO_{2e} per year significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014); SCAQMD, Final Negative Declaration for Phillips 99 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014); SCAQMD, Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014); and SCAQMD, Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (August 2015).

threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions, including CARB's 2017 Scoping Plan, SCAG's 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code.

(2) SCAQMD Thresholds

As discussed above, SCAQMD has an interim GHG significance threshold of 10,000 MTCO₂e per year for stationary source/industrial projects where SCAQMD is the lead agency. This SCAQMD interim GHG significance threshold is not applicable to the Project as the Project does not include industrial uses with significant stationary sources, and the City of Los Angeles is the Lead Agency.

(3) 2006 L.A. CEQA Thresholds Guide

The 2006 L.A. CEQA Thresholds Guide does not identify any criteria to evaluate GHG emissions impacts. Thus, the potential for the Project to result in impacts from GHG emissions is based on the CEQA Guidelines Appendix G thresholds. For the reasons set forth above, to answer both of the above questions, the City will consider whether the Project is consistent with AB 32, SB 32, SB 375 (through demonstration of conformance with the SCAG RTP/SCS), the City's Green New Deal, and the Los Angeles Green Building Code. As discussed above, OPR has noted that lead agencies "should make a good-faith effort to calculate or estimate GHG emissions from a project."⁹¹ GHG emissions are quantified below, consistent with OPR guidelines.

b) Methodology

(1) Project Consistency with Applicable Plans and Policies

The City, as well as the SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency, has not adopted a numerical significance threshold for assessing impacts related to GHG emissions that is applicable to the Project. As there is no applicable adopted or accepted numerical threshold of significance for GHG emissions, the methodology for evaluating the Project's impacts related to GHG emissions focuses on its consistency with Statewide, regional, and local plans approved or adopted by CARB, SCAG, and the City for the purpose of reducing and/or mitigating GHG emissions. This evaluation of consistency with such plans

⁹¹ Governor's Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 2008.

is the sole basis for determining the significance of the Project's GHG-related impacts on the environment.

As discussed previously, the City has established goals and actions to reduce the emission of GHGs from both public and private activities in the Green New Deal and the Los Angeles Green Building Code. Thus, if a project is designed in accordance with these policies and regulations, it would result in a less-than-significant impact because it would be consistent with the overarching State regulations on GHG reduction (AB 32).

A consistency analysis is provided and describes the Project's compliance with performance-based standards included in the regulations outlined in the applicable portions of CARB Climate Change Scoping Plans (i.e., 2008 Scoping Plan, 2014 Scoping Plan, and 2017 Scoping Plan), the 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code.

(2) Quantification of Greenhouse Gas Emissions

In addition to the evaluation of the Project's consistency with plans adopted for the purpose of reducing and/or mitigating GHG emissions, for informational purposes, the analysis also calculates the amount of GHG emissions that would be attributable to the Project using recommended air quality models, as described below. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a), which calls for a good-faith effort to describe and calculate emissions. The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations and requirements adopted to implement plans for the reduction or mitigation of GHG emissions. The significance of the Project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

The California Climate Action Registry (Climate Registry) has prepared the General Reporting Protocol for calculating and reporting GHG emissions from a number of general and industry-specific activities.⁹² The GHG emissions provided in this report are consistent with the General Reporting Protocol framework. The General Reporting Protocol recommends separating GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

⁹² The Climate Registry, General Reporting Protocol for the Voluntary Reporting Program, Version 2.1, January 2016.

- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.⁹³

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility: “As facilities consider changes that would affect their emissions – addition of a cogeneration unit to boost overall efficiency even as it increases direct emissions, for example – the relative impact on total (direct plus indirect) emissions by the facility should be monitored. Annually reported indirect energy usage also aids the conservation awareness of the facility and provides information” to CARB to be considered for future strategies by the industrial sector.⁹⁴ For these reasons, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research directs lead agencies to “make a good-faith effort, based on available information, to calculate, model, or estimate...GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.”⁹⁵ Therefore, direct and indirect emissions have been calculated for the Project.

A fundamental challenge in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular project because the project may cause a shift in the locale for some type of GHG emissions, rather than simply causing “new” GHG emissions. As a result, there is a lack of clarity as to whether a project’s GHG emissions represent a net global increase, reduction, or no change in GHGs that would exist if the project were not implemented. Therefore, the analysis of the Project’s GHG emissions is particularly conservative as it analyzes the General Reporting Protocol’s three categories of GHG emissions: (1) direct, on-site emissions, (2) indirect, off-site emissions, and (3) indirect emissions (other), as described above.

It is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions resulting from Project-related incremental (net) increases from emissions sources mentioned in the scope categories above such as emissions from the use of on-road mobile vehicles, electricity, and natural gas compared to existing conditions. This includes Project construction activities such

⁹³ Embodied energy includes energy required for water pumping and treatment for end-uses. Third-party vehicles include vehicles used by visitors of the Project Site.

⁹⁴ CARB, Staff Report: Initial Statement of Reasons for Rulemaking, Revisions to the Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), 2007, page 27.

⁹⁵ Governor’s Office of Planning and Research, Technical Advisory – CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 2008, page 5.

as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Because potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

GHG emissions are estimated using the California Emissions Estimator Model (CalEEMod, version 2016.3.2), which is a Statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.⁹⁶

(a) *Construction Emissions*

Project construction GHG emissions were estimated for each year of construction activity using CalEEMod and EMFAC2017. Consistent with the assumptions made in the air quality analysis provided in **Section IV.A, Air Quality**, of this Draft EIR, GHG emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date). If the onset of construction is delayed to a later date than assumed in the modeling analysis, construction impacts would be similar to or less than those analyzed, because a more energy-efficient and cleaner burning construction equipment and vehicle fleet mix would be expected in the future. This is because State regulations require construction equipment fleet operators to phase-in less polluting heavy-duty equipment and trucks over time. As a result, should the Project commence construction on a later date than modeled in this GHG impact analysis, GHG impacts would be less than the impacts disclosed herein.

The model input values used in this analysis were adjusted from default input values to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis (refer to **Section IV.A, Air Quality**, of this Draft EIR) to generate GHG emissions values for each construction year. CalEEMod was used to estimate GHG emission values from construction equipment for each construction activity. GHG emissions from worker vehicles, haul trucks, cement trucks, and vendor trucks were estimated outside of CalEEMod using EMFAC2017 emission factors. SCAQMD recognizes that construction-related GHG emissions from projects “occur over a relatively short-

⁹⁶ See: <http://www.aqmd.gov/caleemod/>.

term period of time” and that “they contribute a relatively small portion of the overall lifetime project GHG emissions.”⁹⁷ In accordance with SCAQMD guidance, GHG emissions from construction have been amortized (i.e., averaged annually) over the lifetime of the Project. The SCAQMD defines the lifetime of a project as 30 years.⁹⁸ Therefore, the Project’s total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions. Construction activities would include demolition of the existing buildings and associated parking, site clearing, grading, excavation, and building construction. Emissions from these activities were estimated and annualized by construction phase. A more detailed list of the assumptions for projecting the Project’s construction emissions and descriptions of the Project’s construction subphasing and equipment list are available in the Technical Appendix for Air Quality and Greenhouse Gas Emissions for the Project, which is provided in Appendix B of this Draft EIR.

(b) *Operational Emissions*

Project operational GHG emissions are also estimated using CalEEMod and EMFAC2017. CalEEMod was used to estimate GHG emissions from electricity, natural gas, solid waste, water and wastewater, and landscaping equipment. EMFAC2017 emission factors along with VMT values in the Project’s Transportation Assessment were used to estimate on-road mobile source GHG emissions.⁹⁹ A detailed discussion of the methodology used to estimate the GHG emissions from the Project and existing uses is provided in Appendix B of this Draft EIR. For informational purposes, operational GHG emissions were calculated for the following two GHG conditions to estimate GHG reductions associated with Project GHG reduction characteristics:

- **Project Without GHG Reduction Characteristics, Features, and Measures:** Represents emissions based on a scenario consistent with CARB’s Scoping Plan Statewide NAT forecast for the AB 32 target year of 2020 and continued reductions through 2030, with a project CO₂ of 758.8 lbs/MWh for year 2023, which represents the State’s Renewable Portfolio Standard (RPS) law and growth in electricity demand, but does not include the Project Design Features (see **Subsection IV.E.3.c, Project Design Features**, below), and VMT reductions from the Project’s Transportation Assessment, which accounts for

⁹⁷ SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, pages 3-8.

⁹⁸ SCAQMD, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, December 5, 2008, page 5.

⁹⁹ Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

trip reductions from internal capture, existing public transportation options, and pass-by trips.^{100,101}

- **Project With GHG Reduction Characteristics, Features, and Measures (Project):** Represents emission factors from the Project in the year 2023 consistent with SB 100, which was adopted after the 2017 Scoping Plan and represents the State's most current Renewable Portfolio Standard (RPS) law and growth in electricity demand with an emission factor of 657.8 lbs/MWh for year 2023 scaled proportionately based on the future year renewable energy targets of 44 percent by 2024 and at least 52 percent by 2027, and includes all Project design features (see **Subsection IV.E.3.c, Project Design Features**, below) and VMT reductions from the Project's Transportation Assessment.¹⁰²

As previously noted, operational mobile source GHG emissions are estimated based on CARB's EMFAC2017 model. Mobile source emissions are based on VMT from the Transportation Assessment prepared by Gibson Transportation Consulting, Inc. The trip lengths are based on the location and urbanized setting of the project area. The VMT calculated for the Project was based on the trip generation rates provided in the Project's Transportation Assessment, which accounts for trip reductions from internal capture,¹⁰³ existing public transportation options, the transportation demand management (TDM) Program, and pass-by trips.¹⁰⁴

In addition, the operational mobile source GHG emissions estimates are based on GHG emission factors for the mobile sources and the GWP values for the GHGs emitted. Emissions of GHGs from motor vehicles are dependent on specific vehicle types and models that would travel to and from the Project Site. The national policy for fuel efficiency and emissions standards for the United States auto industry requires that new passenger cars and light-duty trucks achieve an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO₂ per mile by model year 2016 (Phase I standards), based on USEPA calculation methods. In August 2012, more stringent phased-in standards were adopted for new model year 2017 through 2025 passenger cars and light-duty trucks. New model year 2020 vehicles are projected to achieve 41.7 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 213 grams of CO₂ per mile (Phase II standards). By 2025, new vehicles are required to achieve 54.5 mpg (if

¹⁰⁰Internal capture is generally defined as the portion of trips generated by a mixed-use development that both begin and end within the development.

¹⁰¹Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

¹⁰²Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

¹⁰³Internal capture is generally defined as the portion of trips generated by a mixed-use development that both begin and end within the development.

¹⁰⁴Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO₂ per mile (Phase II standards).¹⁰⁵ However, as mentioned above in **Subsection IV.E.2(1), Federal**, in August 2018, the USEPA proposed the SAFE Vehicles Rule that would, if adopted, maintain the CAFE and CO₂ standards applicable in model year 2020 for model years 2021 through 2026. In September 2019, the USEPA published the final rule in the federal register (Federal Register, Vol. 84, No. 188, Friday, September 27, 2019, Rules and Regulations, 51310-51363). The USEPA also published the final rule for the One National Program on Federal Preemption of State Fuel Economy Standards that finalizes critical parts of the SAFE Vehicles Rule and makes clear that federal law preempts state and local tailpipe GHG emissions standards as well as ZEV mandates. California and 23 other states and environmental groups in November 2019 in United States District Court in Washington, filed a petition for the USEPA to reconsider the published rule. The Court has not yet ruled on the lawsuits. The vehicle emissions standards beyond model year 2020 may not occur if the Federal SAFE Vehicles Rules and the One National Program on Federal Preemption of State Fuel Economy Standards are upheld by the Courts. The most current version of the CARB and USEPA-approved EMFAC2017 on-road vehicle emissions model does not account for the effect of the SAFE Vehicles Rules. While CARB has provided off-model adjustment factors for criteria pollutant emissions, CARB has not provided adjustment factors for GHG emissions.¹⁰⁶ However, given that the adjustment factors for gaseous exhaust criteria pollutant factors is an increase of approximately one percent or less, it is reasonable to assume a similar effect on GHG emissions, which are also gaseous pollutants.

All vehicle types would visit the Project Site. Therefore, this assessment uses the Air Basin motor vehicle fleet mix and the fleet average calendar year emissions factors from EMFAC to estimate mobile source GHG emissions. Mobile source emissions are estimated for calendar years 2023, the anticipated full Project buildout year.

With regard to energy demand, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Emissions of GHGs associated with energy usage under the Project's proposed land uses are calculated using the CalEEMod tool. Future fuel consumption rates are estimated based on specific square footage of the medical office and retail/commercial land uses, as well as predicted water supply needs of the Project. Project GHG emissions from building electricity and natural gas usage rates are based on CalEEMod emission factors. Emission factors for GHG emissions due to electrical generation to serve the demands of the Project Site were obtained from

¹⁰⁵USEPA, EPA and NHTSA Set Standards to Reduce Greenhouse Gases and Improve Fuel Economy for Model Years 2017-2025 Cars and Light Trucks, August 2012.

¹⁰⁶CARB, EMFAC Off-Model Adjustment Factors to Account for the SAFE Vehicle Rule Part One, November 20, 2019.

the Los Angeles Department of Water and Power (LADWP) 2017 Power Strategic Long-Term Resource Plan, which accounts for the generation mix using renewable and non-renewable sources.¹⁰⁷ According to the Plan, LADWP provides 20 percent of electricity via renewable sources, which would increase in compliance with the RPS by 50 percent by 2025, 55 percent by 2030, and 65 percent by 2036.¹⁰⁸ With the passage of SB 100, LADWP would be required to update plans to provide an increasing percentage of renewable electricity pursuant to the regulation (i.e., 60 percent by end of 2030 and 100 percent by the end of 2045). Based on LADWP future projections, the Project's anticipated opening year of 2023, an estimated emission factor of 657.8 pounds of CO₂/Mega Watthours (MWh) for electricity was calculated using LADWP projections from existing plans for compliance with the RPS and future projected energy supply resources.^{109,110,111}

Emissions of GHGs associated with solid waste disposal under the Project's proposed land uses are calculated using the CalEEMod tool. The emissions are based on the size of the medical office, retail/commercial, open space, and parking structure land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHGs emitted.¹¹² Refer to the Project's Initial Study for estimated solid waste disposal and diversion rates from the Project.

The emissions of GHGs associated with water demand and wastewater generation from the Project are calculated using CalEEMod. The emissions are based on the size of the existing land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution and for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHGs emitted.¹¹³ As provided in Table 6, *Estimated Proposed Water Demand and Sewage Generation*, on page 90 of the Initial Study (provided in Appendix A of this Draft EIR), the total estimated water demand for the existing uses was calculated to be 386 gallons per day (gpd) and the total estimated water demand for the Project was calculated to be 43,136 gpd, for a net total of 42,750 gpd.

¹⁰⁷ Los Angeles Department of Water and Power (LADWP), 2017 Power Strategic Long-Term Resource Plan, December 2017.

¹⁰⁸ LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017.

¹⁰⁹ Pre-SB 100 refers to the emission factor based on electricity/energy sources from the LADWP forecast plans that do not yet incorporate SB 100. Currently, LADWP does not have a plan that describes how it will achieve SB 100's Renewables Portfolio Standard numbers, but it is expected to do so. Therefore, using the pre-SB 100 numbers would be more conservative.

¹¹⁰ LADWP, 2017-2018 Briefing Book, August 2017.

¹¹¹ CEC, Utility Energy Supply Plans from 2015, 2016, http://www.energy.ca.gov/almanac/electricity_data/s-2_supply_forms_2015/, accessed April 29, 2020.

¹¹² CAPCOA, CalEEMod User's Guide For CalEEMod Version 2016.3.2.

¹¹³ CAPCOA, CalEEMod User's Guide For CalEEMod Version 2016.3.2.

The emissions of GHGs associated with operational area sources under the Project are calculated using the CalEEMod tool. The emissions for landscaping equipment are based on the size of the open space required based on medical office and commercial/retail land uses, the GHG emission factors for fuel combustion, and the GWP values for the GHGs emitted.

Project stationary sources would include an on-site emergency generator, which would provide emergency power primarily for lighting and other emergency building systems. Emergency generator emissions are calculated based on emissions factors available from CARB and the SCAQMD in compliance with applicable regulations. Emissions of GHGs would be generated during maintenance and testing operations and emissions were estimated separately outside of the CalEEMod software. Emergency generator emissions include compliance with CARB and SCAQMD regulations, including SCAQMD Rule 1470 (Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) mandated emission limits and operating hour constraints. As discussed previously, SCAQMD Rule 1470 applies to stationary compression ignition engine greater than 50 brake horsepower and sets limits on emissions and operating hours. In general, new stationary emergency standby diesel-fueled engines greater than 50 brake horsepower are not permitted to operate more than 50 hours per year for maintenance and testing.

Operational GHG emissions are assessed based on the Project-related incremental increase in GHG emissions compared to baseline conditions. Under CEQA, the baseline environmental setting is established as the date the Notice of Preparation for this EIR was circulated (i.e., January 14, 2020).

Emissions calculations also include credits or reductions for the design elements and GHG-reducing measures, some of which are required by regulation, such as compliance with SCAQMD rules and regulations and reductions in energy and water demand. Because the Project is subject to the Los Angeles Green Building Code, design elements of the Project reflect these minimum requirements.

CAPCOA has provided guidance on mitigating or reducing GHG emissions from land use development projects. In September 2010, CAPCOA released a guidance document titled Quantifying Greenhouse Gas Mitigation Measures which provides GHG reduction values for recommended GHG reduction strategies.¹¹⁴ These strategies serve to reduce VMT and vehicle trips, which correspond to a reduction in relative GHG emissions.

There are challenges in determining consumption-based GHG emissions for embodied GHG emissions such as the production of construction materials and consumer goods and services include that many require elongated supply chains. Therefore, the data necessary to accurately quantify embodied emissions may not

¹¹⁴CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010.

be readily available due to the fact that other jurisdictions (particularly outside California or outside the United States) may not track GHG emissions in sufficient detail and, in part due to business practices concerning proprietary data. Furthermore, as discussed in the Draft AEP White Paper: Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implications for CEQA and Climate Action Plans, “CEQA admonishes lead agencies to avoid speculation in completing their analyses and making conclusions. Furthermore, CEQA does not require a lead agency to complete every study possible, but rather to fully disclose impacts based on reasonably available data. Developing project-specific estimates of embedded GHG emissions for all construction materials, or future consumed goods and services that are related to complex supply chains, would require extensive research and may not be able to accurately identify GHG emissions for many consumed items without substantial uncertainty.”¹¹⁵

In addition, the State addressed embodied (lifecycle) GHG emissions in the Final Statement of Reasons for Regulatory Action, prepared for the amendment to Appendix F of the CEQA Guidelines pursuant to SB 97:

The amendments to Appendix F remove the term —lifecycle. No existing regulatory definition of —lifecycle exists. In fact, comments received during OPR’s public workshop process indicate a wide variety of interpretations of that term. (Letter from Terry Rivasplata et al. to OPR, February 2, 2009, at pp. 5, 12 and Attachment; Letter from Center for Biological Diversity et al. to OPR, February 2, 2009, at pp. 17.) Thus, retention of the term —lifecycle in Appendix F could create confusion among lead agencies regarding what Appendix F requires. Moreover, even if a standard definition of the term —lifecycle existed, requiring such an analysis may not be consistent with CEQA. As a general matter, the term could refer to emissions beyond those that could be considered —indirect effects of a project as that term is defined in section 15358 of the State CEQA Guidelines. Depending on the circumstances of a particular project, an example of such emissions could be those resulting from the manufacture of building materials. (CAPCOA White Paper, pp. 50-51.) CEQA only requires analysis of impacts that are directly or indirectly attributable to the project under consideration. (State CEQA Guidelines, § 15064(d).) In some instances, materials may be manufactured for many different projects as a result of general market demand, regardless of whether one particular project proceeds. Thus, such emissions may not be caused by the project under consideration. Similarly, in this scenario, a lead agency may not be able to require mitigation for emissions that result from the

¹¹⁵ Association of Environmental Professionals, Draft AEP White Paper - Production, Consumption and Lifecycle Greenhouse Gas Inventories: Implications for CEQA and Climate Action Plans, August 2017, page 5-3.

*manufacturing process. Mitigation can only be required for emissions that are actually caused by the project. (State CEQA Guidelines, § 15126.4(a)(4).)*¹¹⁶

Therefore, embodied GHG emissions were not considered in this analysis as they are not consistent with generally recommended GHG emissions analysis methodology under CEQA.

(3) Comparison to Project without Reduction Features Scenario

As discussed previously, State, regional, and local GHG reduction plans and policies, such as CARB's Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, L.A.'s Green New Deal, and the Los Angeles Green Building Code would be applicable to the Project. These plans and policies are intended to reduce GHG emissions in accordance with the goals of AB 32. In order to evaluate the efficacy of the GHG reduction characteristics, features, and measures that would be implemented as part of the Project as required by these GHG reduction plans and policies, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. This approach mirrors the concepts used in CARB's Climate Change Scoping Plan, which demonstrates GHG reductions compared to a Project without Reduction Features scenario. This comparison is provided only to evaluate the Project's efficiency with respect to GHG reduction plans and policies, but is not relied on as a threshold of significance.

The GHG emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures are quantified based on specific and defined circumstances in the context of relevant State activities and mandates, as described further above under **Subsection IV.E.3.b)(2)(b), Project Without GHG Reduction Characteristics, Features, and Measures** description. Because this comparison is intended to mirror the concepts used in CARB's Climate Change Scoping Plan, the GHG emissions for the Project without implementation of GHG reduction characteristics, features, and measures is evaluated based on the specific and defined circumstances that CARB relied on when it projected the State's GHG emissions in the absence of GHG reduction measures in the First Update to the Climate Change Scoping Plan.

The specific Project and Project Site characteristics as described in the Project's Transportation Assessment, including: being a multi-use development its close proximity to other off-site retail, restaurant, entertainment, commercial, and job destinations, and proximity to existing public transportation options.¹¹⁷ Project

¹¹⁶CNRA, Final Statement of Reasons for Regulatory Action – Amendments to the State CEQA Guidelines Addressing Analysis and Mitigation of Greenhouse Gas Emissions Pursuant to SB 397, December 2009, page 71.

¹¹⁷Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

design features such as Project Design Feature TRAF-PDF-1 (TDM Program, refer to **Section IV.I, *Transportation***, of this Draft EIR) are not included as they encompass GHG reduction strategies and features that would be consistent with State, regional, and local GHG reduction plans and policies or would go above and beyond regulatory requirements. The emissions are estimated using the CalEEMod software, and the model inputs were adjusted to account for the Project without implementation of GHG reduction characteristics, features, and measures; in addition, the analysis assumes the Project without implementation of GHG reduction characteristics, features, and measures. Additionally, the calculations under this scenario would incorporate the same land uses and building square footage as the proposed Project. In addition, mobile emissions would not incorporate certain VMT reductions from the Project's Transportation Assessment and the TDM trip reductions.

c) Project Design Features

No specific project design features are proposed with regard to GHG emissions. As discussed in **Section IV.I, *Transportation***, of this Draft EIR, the Project would implement Project Design Feature TRAF-PDF-1, Transportation Demand Management (TDM) Program, which would include strategies in a TDM Program that would serve to reduce VMT, which would, in turn, reduce GHG emissions. No additional GHG-related project design features are applicable to the Project.

d) Analysis of Project Impacts

Threshold (a): Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Threshold (b): Would the project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

(1) Impact Analysis

(a) Project Consistency with Applicable Plans and Policies

As mentioned above, in the absence of any adopted quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted for the purpose of reducing the emissions of GHGs.

As described above, compliance with a GHG emissions reduction plan renders a less-than-significant impact. The analyses below demonstrate that the Project is consistent with the applicable GHG emission reduction plans and policies included

within the 2017 Scoping Plan, the SCAG 2020-2045 RTP/SCS, the City's Green New Deal, and Los Angeles Green Building Code. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

(i) CARB's 2017 Updated Climate Change Scoping Plan

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

In support of AB 32 and SB 32, the State has promulgated specific laws and strategies aimed at GHG reductions that are applicable to the Project. The primary focus of many of the Statewide and regional plans, policies, and regulations is to address worldwide climate change. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the Project's increase in annual GHG emissions would cause a measurable change in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago; however, the net effect is difficult to quantify. The GHG emissions of the Project alone would not likely cause a direct physical change in the environment. According to CAPCOA, "GHG impacts are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective."¹¹⁸ It is global GHG emissions in their aggregate that contribute to climate change, not any single source of GHG emissions alone.

The Climate Change Scoping Plan outlines a framework that relies on a broad array of GHG reduction actions, which include direct regulations, alternative compliance mechanisms, incentives, voluntary actions, and market-based mechanisms such as the Cap-and-Trade program. The Climate Change Scoping Plan builds off of a wide array of regulatory requirements that have been promulgated to reduce Statewide GHG emissions, particularly from energy demand and mobile sources. While these regulatory requirements are not targeted at specific land use development projects, they would indirectly reduce a development project's GHG emissions. A discussion of these regulatory requirements that would reduce the Project's GHG emissions are provided below.

¹¹⁸CAPCOA, CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act, January 2008.

- California Renewables Portfolio Standard (RPS) Program (SB 100):** While this action does not directly apply to individual projects, the Project complies with the RPS program inasmuch as its electricity is provided by LADWP, which, in compliance with the RPS program, is required to obtain 33 percent renewable power by 2020 and has committed to achieving 50 percent renewables by 2025.¹¹⁹ Furthermore, per the updated requirements of SB 100, signed by Governor Brown on September 10, 2018, LADWP would be required to procure eligible renewable electricity for 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030, and should plan to achieve 100 percent eligible renewable energy resources and zero-carbon resources by December 31, 2045. Thus, the Project would be supplied with electricity via renewable sources at increasing rates over time reducing the Project's electricity-related GHG emissions.
- SB 1368/AB 398, CCR Title 20, Cap-and-Trade Program:** The State's Cap-and-Trade Program reduces GHG emissions from major sources (deemed "covered entities") by setting a firm cap on Statewide GHG emissions and employing market mechanisms to achieve emission reduction targets. While the Cap-and-Trade Program does not directly apply to individual projects, the Project would comply with the Program inasmuch as the Project's electricity usage would be covered by the Cap-and-Trade Program as LADWP is a covered entity, resulting in a reduction of GHG emissions from the Project's energy consumption.
- AB 1493 (Pavley Regulations):** The State's Pavley Regulations apply to new passenger vehicles from model year 2012 through 2016 (Phase I) and model years 2017–2025 (Phase II). While this action does not apply to individual projects, future residents, employees, and visitors to the Project Site would purchase new vehicles in compliance with this regulation. Mobile source emissions generated by future residents, employees, and visitors to the Project Site would be reduced with implementation of AB 1493. However, it is noted that the vehicle emissions standards beyond model year 2020 may not occur if the Federal SAFE Vehicles Rules and the One National Program on Federal Preemption of State Fuel Economy Standards are upheld by the Courts.
- Advanced Clean Cars Program:** The Advanced Clean Cars (ACC) program includes Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years. While this action does not directly apply to individual projects, the standards would apply to all vehicles purchased or used by employees and visitors to the Project Site. The Project would designate a minimum of 8 percent of on-site parking for carpool and/or

¹¹⁹LADWP, 2017 Power Strategic Integrated Long-Term Resource Plan, December 2017, page ES-18.

alternative-fueled vehicles. In addition, the Project design provides for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations (EVSE). Consistent with the requirements of the Los Angeles Green Building Code, the Project would provide 84 parking spaces that would be capable of supporting future EVSE and 42 parking spaces that would be equipped with EV charging stations. As such, the Project would support compliance with this regulation.

- **Low Carbon Fuel Standard (Executive Order S-01-07):** This regulation establishes a Statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 and 18 percent by 2030. While this action does not directly apply to individual projects, future residents, employees, and visitors to the Project Site would utilize transportation fuels in compliance with this regulation. GHG emissions related to vehicular travel by Project would benefit from this regulation and mobile source emissions generated by future employees, and visitors to the Project Site would be reduced with implementation of the LCFS.
- **SB 375:** SB 375 establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. Under SB 375, CARB is required, in consultation with the State's Metropolitan Planning Organizations, to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. While this action does not directly apply to individual projects, the Project would be consistent with 2020-2045 RTP/SCS goals and objectives under SB 375 to implement "smart growth." As discussed below in **Subsection IV.E.3.d)(1)(a)(ii), SCAG 2020-2045 RTP/SCS**, the Project would be consistent with the SCAG 2020-2045 RTP/SCS.
- **SB X7-7:** The Water Conservation Act of 2009 sets an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. Each urban retail water supplier shall develop water use targets to meet this goal. While this action does not directly apply to individual projects, the Project would support compliance with this regulation by implementing water efficiency measures through compliance with the City's requirements and the CALGreen Code.
- **California Integrated Waste Management Act (IWMA) of 1989 and AB 341:** The IWMA mandated that State agencies develop and implement an integrated waste management plan which outlines the steps to be taken to divert at least 50 percent of their solid waste from disposal facilities. AB 341 directs CalRecycle to develop and adopt regulations for mandatory commercial recycling and sets a Statewide goal for 75 percent disposal reduction by the year 2020. While this action does not directly apply to individual projects, the Project would comply with the IWMA inasmuch as it would be served by a solid waste collection and recycling service that includes mixed waste processing and that yields waste diversion results comparable to source separation and consistent with Citywide recycling targets. According to the City of Los Angeles

Zero Waste Progress Report, the City achieved a landfill diversion rate of approximately 76 percent by year 2012.¹²⁰

Table IV.E-4, *Consistency with Applicable Climate Change Scoping Plan Greenhouse Gas Reduction Strategies*, contains a list of GHG-reducing strategies applicable to the Project. The analysis describes the Project's compliance and consistency with these strategies outlined in the State's Climate Change Scoping Plan to reduce GHG emissions. As discussed below, the Project would implement design features and incorporate characteristics to reduce energy use, conserve water, reduce waste generation, and reduce vehicle travel consistent with Statewide strategies and regulations. As a result, the Project would not conflict with applicable Climate Change Scoping Plan strategies and regulations to reduce GHG emissions.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN
GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Consistency Analysis
Energy		
CCR, Title 24. Energy Efficiency Standards for Residential and Nonresidential Buildings	State, Local Jurisdictions	No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the Title 24 Building Energy Efficiency Standards and CALGreen Code or applicable version at the time of building permit issuance.
California Green Building Standards Code Requirements. Heating, ventilation, and air conditioning (HVAC) Systems will be designed to meet American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) standards.	State, Local Jurisdictions	No Conflict. Consistent with regulatory requirements, the Project would utilize energy efficiency appliances and equipment and would meet the applicable energy standards in the Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version at the time of building permit issuance and would install ENERGY STAR compliant appliances. The Project would utilize energy efficiency HVAC Systems that would meet or exceed the applicable energy standards in ASHRAE Appendix G and the Title 24 Building Energy Efficiency Standards and CALGreen Code, or applicable version of these standards at the time of building permit issuance.

¹²⁰City of Los Angeles Department of Public Works, LA Sanitation, Zero Waste Progress Report, March 2013.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN
GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Consistency Analysis
Energy commissioning shall be performed for buildings larger than 10,000 square feet.	State, Local Jurisdictions	No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, including Code Section 5.410.2, which in turn requires compliance with mandatory standards in the and CALGreen Code.
Refrigerants used in newly installed HVAC systems shall not contain any CFCs.	State, Local Jurisdictions	No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the and CALGreen Code for the use of CFCs in HVAC systems.
Parking spaces shall be designed for carpool or alternative fueled vehicles. Up to eight percent of total parking spaces will be designed for such vehicles.	State, Local Jurisdictions	No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the and CALGreen Code. The Project would designate a minimum of eight percent of on-site parking for carpool and/or alternative-fueled vehicles (approximately 33 spaces). In addition, the Project design provides for the installation of the conduit and panel capacity to accommodate future electric vehicle charging stations into a minimum of 30 percent of the parking spaces (approximately 84 spaces), with 10 percent of the Code-required spaces further improved with electric vehicle charging stations (approximately 21 spaces).
Long-term and short-term bike parking shall be provided for up to 5 percent of vehicle trips.	State, Local Jurisdictions	No Conflict. The Project would meet this requirement by providing 716 bicycle parking spaces, which would exceed five percent of vehicular parking, as part of its compliance with the City bicycle parking requirements and CALGreen Code.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN
GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Consistency Analysis
Stormwater Pollution Prevention Plan (SWPPP) required.	State, Local Jurisdictions	No Conflict. As discussed in Response to Checklist Question VII(b) in the Initial Study, provided in Appendix A of this Draft EIR, in accordance with regulatory requirements, a Stormwater Pollution Prevention Plan (SWPPP) would be prepared that incorporates Best Management Practices (BMPs) to control water erosion during the Project's construction period. As such, the Project would meet this action/strategy.
Indoor water usage must be reduced by 20 percent compared to current California Building Code Standards for maximum flow.	State, Local Jurisdictions	No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the and CALGreen Code, such as through using low-water or low-flow fixtures and water efficient irrigation.
All irrigation controllers must be installed with weather sensing or soil moisture sensors.	State, Local Jurisdictions	No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the and CALGreen Code and all irrigation controllers will be installed with weather sensing or soil moisture sensors.
Wastewater generation shall be reduced by 20 percent compared to current California Building Standards.	State, Local Jurisdictions	No Conflict. The Project would meet this requirement as part of its compliance with the City's requirements and the CALGreen Code, such as through using low-water or low-flow fixtures and water efficient irrigation.
Requires a minimum of 50 percent recycle or reuse of nonhazardous construction and demolition debris.	State, Local Jurisdictions	No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the and CALGreen Code. Construction and demolition materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519) where all private waste haulers collecting solid

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN
GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Consistency Analysis
Requires documentation of types of waste recycled, diverted or reused.	State, Local Jurisdictions	<p>waste within the City, including construction and demolition (C&D) waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 94 percent.</p> <p>No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the and CALGreen Code. The Project would be consistent with the City and State waste requirements by utilizing waste collection services that are approved by the City and that meet the applicable requirements for waste diversion and recycling mandates. The City generally relies on single-stream waste recycling where mixed waste is collected and sorted for recycling at a waste reclamation facility. The Project would subscribe to a municipal solid waste collection service that is approved by the City and that meets applicable City and State waste collection, management, recycling and diversion requirements.</p>
Water		
CCR, Title 24. Title 24 includes water efficiency requirements for new residential and non-residential uses.	State, Local Jurisdictions	No Conflict. Refer to discussion under Title 24 Building Standards Code and California Green Building Standards Code Requirements, above.
Other Sources		
Climate Action Team. Reduce diesel-fueled commercial motor vehicle idling.	State, CARB.	No Conflict. Consistent with regulatory requirements, the Project would comply with the CARB Air Toxics Control Measure to limit heavy duty diesel motor vehicle idling to no more than five minutes at any given time.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN
GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Consistency Analysis
Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	Local Jurisdictions	No Conflict. The Project complies with this policy inasmuch as the Project is under the jurisdiction of the City, which with other local jurisdictions is committed to plant five million trees in urban areas by 2020 to effect climate change emission reductions, the Project would provide approximately 17 net new trees in landscaping on the ground level of the Project Site and additional trees provided in the small landscaped patios on Floors 6 through 10, which would be an increase compared to the existing conditions.
Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	State, Local Jurisdictions	No Conflict. As discussed previously, consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the and CALGreen Code
Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	State, Local Jurisdictions	No Conflict. While this action does not directly apply to individual projects, the Project would meet or exceed the energy standards in the Title 24 Building Energy Efficiency Standards, and the CALGreen Code.
Apply strategies that integrate transportation and land-use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors and implementing intelligent transportation systems.	State, CARB, SCAG	Compliant. The Project would incorporate physical and operational Project characteristics that would reduce vehicle trips and VMT and encourage alternative modes of transportation for visitors and employees. The Project's dense, mixed-use development is located on an urban infill Project Site that is located within an identified HQTa and Transit Priority Area (TPA). ¹²¹ The Project co-locates its complementary commercial/restaurant land uses in proximity to existing off-site commercial and residential uses. The

¹²¹The Project Site is also located in a Transit Priority Area (TPA), which is defined as an area within 0.5-mile of a major transit stop that is existing or planned. A "major transit stop" is defined as a site containing an existing rail transit station or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

TABLE IV.E-4
CONSISTENCY WITH APPLICABLE CLIMATE CHANGE SCOPING PLAN
GREENHOUSE GAS REDUCTION STRATEGIES

Actions and Strategies	Responsible Party	Consistency Analysis
Reduce energy use in private buildings.	State, Local Jurisdictions	<p>Project is in a highly walkable area served by frequent and comprehensive transit within 0.5 mile of the Project Site. The increases in land use intensity and diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions</p> <p>No Conflict. Consistent with regulatory requirements, the Project would meet or exceed the applicable provisions of the Los Angeles Green Building Code, which in turn requires compliance with mandatory standards in the and CALGreen Code, such as through installing energy-efficient lighting and appliances, and equipment.</p>

SOURCE: ESA, 2020.

As described in Table IV.E-4, the Project is compliant with the applicable laws and regulations that serve to reduce GHG emissions. In addition to the Project's consistency with applicable GHG reduction laws and strategies, the Project would not conflict with the future anticipated Statewide GHG reductions goals. CARB has outlined a number of potential strategies for achieving the 2030 reduction target of 40 percent below 1990 levels, as mandated by SB 32. These potential strategies include using renewable resources for half of the State's electricity by 2030, increasing the fuel economy of vehicles and the number of zero-emission or hybrid vehicles, reducing the rate of growth in VMT, supporting other alternative transportation options, and use of high-efficiency appliances, water heaters, and HVAC systems.¹²² The Project would benefit from Statewide and utility-provider efforts towards increasing the portion of electricity provided from renewable resources. The utility provider for the Project, LADWP, achieved 32 percent of electricity via renewable sources in 2018, is on track to exceed the next State legislated milestone of 33 percent in 2020, and has committed to providing 50

¹²²Energy + Environmental Economics (E3), Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 6, 2015.

percent by 2025, 55 percent by 2030, and 65 percent by 2036.^{123,124,125} As these targets were determined prior to the passage of SB 100, LADWP would also be required to comply with the RPS goals as discussed above in **Subsection IV.E.2.a)(2)(d), Energy**.¹²⁶ The Project would use energy-efficient appliances and equipment (e.g., ENERGY STAR rated). The Project would also benefit from Statewide efforts towards increasing the fuel economy standards of vehicles. The Project would support reducing VMT given its location at an infill site close to existing transit options, including the Los Angeles County Metropolitan Transportation Authority (Metro) bus routes 30/330, 20/720, 728 and 105/705 and Antelope Valley Transit Authority (AVTA) bus route 786.

The 2017 Scoping Plan (adopted in December 2017) also outlines strategies to reduce GHG emissions to achieve the 2030 target from sectors that are not directly controlled or influenced by the Project but, nonetheless, contribute to Project-related GHG emissions. For instance, the Project itself is not subject to the Cap-and-Trade regulation; however, Project-related emissions would decline pursuant to the regulation as utility providers and transportation fuel producers are subject to renewable energy standards, Cap-and-Trade regulation, and the LCFS. The 2017 Scoping Plan also calls for the doubling of the energy efficiency savings, including utility demand-response flexibility for 10 percent of residential and commercial electric space heating, water heating, air conditioning and refrigeration. The strategy is in the process of being designed specifically to accommodate existing residential and commercial uses under the CEC's Existing Building Energy Efficiency Action Plan.¹²⁷ While CARB is in the process of expanding the regulatory framework to meet the 2030 reduction target based on the existing laws and strategies in the 2017 Scoping Plan, the Project would support or not impede implementation of these potential GHG reduction strategies identified by CARB for all the reasons summarized in Table IV.E-4.

Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve 2050 goals, they demonstrate that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study or not currently

¹²³LADWP, Renewable Energy Program Progress, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-renewableenergypolicy?_afWindowId=qgysh2515_1&_afLoop=61924918578548&isNoLocal=true&_afWindowMode=0&_adf.ctrl-state=qgysh2515_4), accessed December 7, 2020.

¹²⁴LADWP, Power Content Label, July 2019.

¹²⁵LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, page ES-18.

¹²⁶Note that LADWP will incorporate the targets of SB 100 into the upcoming 2018 Power Strategic Long-Term Resource Plan (see: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-renewableenergypolicy?_afWindowId=qgysh2515_1&_afLoop=61924918578548&isNoLocal=true&_afWindowMode=0&_adf.ctrl-state=qgysh2515_4).

¹²⁷CEC, 2016 Existing Buildings Energy Efficiency Plan Update, December 2016.

feasible at the time the 2017 Scoping Plan was adopted could enable the State to meet the 2050 targets.¹²⁸ For example, the 2017 Scoping Plan states some policies are not feasible at this time, such as Net Zero Carbon Buildings, but that this type of policy would be necessary to meet the 2050 target.

With Statewide efforts underway to facilitate the State's achievement of those goals, it is reasonable to expect the Project's GHG emissions to decline from their opening year levels as reported below in **Section IV.E.3.d)(1)(b)(ii), Operational Emissions**, as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions at buildout likely represents the maximum emissions for the Project as anticipated regulatory developments and technology advances are expected to reduce emissions associated with the Project, such as emissions related to electricity use and vehicle use.

Based on the analysis above, the Project would be consistent with CARB's Scoping Plans (i.e., 2008 Scoping Plan, 2014 Scoping Plan, and 2017 Scoping Plan) and given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the State's GHG reduction targets for 2030 and 2050. Therefore, impacts would be less than significant.

(ii) *SCAG 2020-2045 RTP/SCS*

Transportation-related GHG emissions would be the largest source of emissions from the Project. This finding is consistent with the findings in regional plans, including the 2020-2045 RTP/SCS, which recognizes that the transportation sector is the largest contributor to the State's GHG emissions. At the regional level, the 2020-2045 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs.

The purpose of the SCAG 2020-2045 RTP/SCS is to achieve the regional per capita GHG reduction targets for the passenger vehicle and light-duty truck sector established by CARB pursuant to SB 375. SCAG's Program EIR for the 2020-2045 RTP/SCS, certified on May 7, 2020, states that "[e]ach [Metropolitan Planning Organization] is required to prepare an SCS as part of their RTP in order to meet

¹²⁸E3, Summary of the California State Agencies' PATHWAYS Project: Long-Term Greenhouse Gas Reduction Scenarios, April 6, 2015; Greenblatt, Jeffrey, "Modeling California Impacts on Greenhouse Gas Emissions," Energy Policy, Vol. 78, 2015, pages 158-172. The CARB, CEC, 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% 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.

these GHG emissions reduction targets by aligning transportation, land use, and housing strategies with respect to [Senate Bill] 375.”¹²⁹ The 2020-2045 RTP/SCS seeks improved mobility and accessibility, which is defined as “the ability to reach desired destinations with relative ease and within a reasonable time, using reasonably available transportation choices.”¹³⁰ The 2020-2045 RTP/SCS seeks to implement strategies that “alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation.”¹³¹ As part of the 2020-2045 RTP/SCS, “transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region’s growth would be encouraged to accommodate increases in population, households, employment, and travel demand.”¹³² Moreover, the 2020-2045 RTP/SCS states that while “[t]ransportation emissions are most prevalent relative to all other sectors in California and specifically in the SCAG region,” the 2020-2045 RTP/SCS would focus “growth in existing urban regions and opportunity areas, where transit and infrastructure are already in place. Locating new growth near bikeways, greenways, and transit would increase active transportation options and the use of other transit modes, thereby reducing number of vehicle trips and trip lengths and associated emissions.”¹³³

In order to assess the Project’s potential to conflict with the 2020-2045 RTP/SCS, this section analyzes the Project’s land use characteristics for consistency with the strategies and policies set forth in SCAG’s 2020-2045 RTP/SCS to meet GHG emission-reduction targets set by CARB.¹³⁴ Generally, projects are considered consistent with applicable City and regional land use plans and regulations, such as SCAG’s 2020-2045 RTP/SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. As discussed below, the Project would be consistent with the 2020-2045 RTP/SCS goals and benefits intended to improve mobility and access to diverse destinations, provide better “placemaking,” provide more transportation choices, and reduce vehicular demand and associated emissions. Therefore, the Project would be

¹²⁹SCAG, Program Environmental Impact Report – 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, May 2020, page 3.8-73.

¹³⁰SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, pages 129.

¹³¹SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, page 51.

¹³²SCAG, Program Environmental Impact Report – 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, May 2020, page 3.8-62.

¹³³SCAG, Program Environmental Impact Report – 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, May 2020, page 3.8-14, 65.

¹³⁴As discussed in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, the actions and strategies included in the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy remain unchanged from those adopted in the 2012-2035 and 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy.

consistent with the GHG reduction-related actions and strategies contained in the 2020-2045 RTP/SCS.

The Project does not provide residential uses, and, as such, population and housing growth are not relevant metrics for the Project's consistency with SCAG's 2020-2045 RTP/SCS actions and strategies. However, with respect to employment, consistent with SCAG's 2020-2045 RTP/SCS alignment of transportation and land use strategies, the Project would accommodate increases in employment and associated travel demand. As discussed below, it is an urban "infill" project located in an HQTAs that would replace existing commercial uses on an urban infill site with a high-density, medical office and retail-commercial mixed-use development. The Project proposes higher density, consistent with compact growth, on infill urban land accessible to and well served by public transit including frequent and comprehensive transit services. The Project would provide job opportunities in an HQTAs and TPA, which SCAG defines as an area within 0.5 miles of a well-served transit stop. Thus, the Project is in line with and advances key objectives of the 2020-2045 RTP/SCS to achieve regional GHG and VMT reductions from land use and transportation by focusing new employment in the region's HQTAs. The Project would also provide bicycle parking for Project employees and visitors, and facilitate pedestrian and bicycle movements by providing convenient access to and from on-site uses, which would support active transportation options. Pedestrian access to the retail-commercial uses would be from the South Sweetzer Avenue and South San Vicente Boulevard street frontages. Access to the office uses would be from the ground level lobby for the office building along South San Vicente Boulevard and from the parking levels via internal stairs and elevators. The Project would provide convenient transit access, including access to the Metro bus routes 30/330, 20/720, 728 and 105/705, and AVTA bus route 786, and the future Wilshire/La Cienega Metro D (Purple) Line Station, which is currently under construction and is anticipated to be operational in 2023.¹³⁵ The high employment density of the Wilshire Community Plan area supports the expectation that projects located in the area would provide high levels of walkability and high potential for transit usage by Project employees and visitors. Further, the Project's specific location and intense mixed-use design in close proximity to high-quality transit, including the multiple bus routes and the future Wilshire/La Cienega Metro D (Purple) Line Station, its close proximity to other off-site retail, restaurant, entertainment, commercial, and job destinations, and its highly walkable environment support the conclusion from this analysis that the Project has been properly located so that its development would minimize VMT.¹³⁶

¹³⁵ Los Angeles County Metropolitan Transportation Authority (Metro), Metro Purple Line Extension FAQs, <https://www.metro.net/projects/westside/>, accessed April 28, 2020.

¹³⁶ WalkScore.com (www.walkscore.com) rates the Project Site with a score of 92 of 100 possible points. Walk Score calculates the walkability of specific addresses by taking into account the ease of living in the neighborhood with a reduced reliance on automobile travel.

As such, the Project would be consistent with regional plans to reduce VMT and associated GHG emissions.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2020-2045 RTP/SCS, which are based on changing the region's land use and travel patterns in the following key areas:

- Compact growth in areas accessible to transit;
- Locate jobs in proximity to transit;
- Locate job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

The Project represents an infill development within an HQTA, which is defined by the 2020-2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of an existing or planned fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes (or less) during peak commuting hours.¹³⁷ As previously discussed, the Project Site is located within 0.5 miles of public transportation opportunities, including Metro bus routes 30/330, 20/720, 728 and 105/705, and AVTA bus route 786, and the future Wilshire/La Cienega Metro D (Purple) Line Station, which is currently under construction and is anticipated to be operational in 2023. In addition, the Project would also provide up to 716 on-site bicycle parking spaces, which would exceed the requirements of the LAMC. The Project would provide employees and visitors with access to public transit and opportunities for active transportation, which would facilitate a reduction in VMT and related vehicular GHG emissions. These and other measures, including internal capture of vehicle trips from the Project's mix of uses the TDM Program, as provided in Project Design Feature TRAF-PDF-1 in **Section IV.I, Transportation**, of this Draft EIR, would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would be consistent with the goals of the 2020-2045 RTP/SCS.¹³⁸

SCAG has established land use strategies which lead to reduced VMT. While not a regulatory document, CAPCOA has provided guidance on mitigating or reducing emissions from land use development projects within its guidance document entitled *Quantifying Greenhouse Gas Mitigation Measures* to provide a quantification tool to local governments on measures that are frequently considered as mitigation for GHG impacts. The measures presented in the CAPCOA guidance document were screened on the basis of feasibility of

¹³⁷SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, pages 23 and 51.

¹³⁸Internal capture of vehicle trips refers to trips generated by a mixed-use development that would begin and end within the development.

quantifying the emissions, the availability of meaningful and robust data upon which to base the quantification, and whether the measures (alone or in combination with other measures) would result in appreciable reductions in GHG emissions.¹³⁹ This analysis uses the CAPCOA guidance to quantify to the Project's GHG reductions to assist in determining the Project's general consistency with the strategies laid out in the 2020-2045 RTP/SCS.

Strategies in the 2020-2045 RTP/SCS to reduce vehicle trips and VMT have been shown by CAPCOA to reduce vehicle trips and VMT, and corresponding vehicle GHG and air pollutant emissions. While not a regulatory document, the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, provides emission reduction values for recommended GHG reduction strategies, including land use strategies.¹⁴⁰ As an infill project located in an HQTa near transit, the Project's land use characteristics satisfy criteria identified by CAPCOA for infill projects that would reduce vehicle trips and VMT compared to the Air Basin average. The land use characteristics include increased density, location efficiency, increased land use diversity and mixed-uses, increased destination accessibility, increased transit accessibility, improve design of development, and provide pedestrian network improvements.¹⁴¹ The land use characteristics, detailed below, are shown in the CAPCOA guidance document to reduce vehicle trips to and from the Project Site as compared to the Air Basin average. These Project land use characteristics would, therefore, support the regional reduction of VMT and associated air pollutant and GHG emissions compared to Air Basin averages to advance the RTP/SCS goals for "encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment."^{142,143} This analysis uses the CAPCOA guidance to assist in determining the Project's general consistency with the strategies laid out in the 2020-2045 RTP/SCS.

- CAPCOA LUT-1: Increase Density:** Increased density, measured in terms of persons, jobs, or commercial units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services, and provides a foundation for the implementation of other strategies such as enhanced transit services. This characteristic corresponds to CAPCOA LUT-1, in which the relative reduction in VMT applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects.¹⁴⁴ The Project is located in an urban infill location and is a mixed-use development that would

¹³⁹CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures*, August 2010.

¹⁴⁰CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures*, August 2010.

¹⁴¹CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures*, August 2010, page 59.

¹⁴²Gibson Transportation Consulting, Inc., *Transportation Assessment for the 656 San Vicente Medical Office Project*, November 2020.

¹⁴³SCAG, *Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy*, September 2020, page 46.

¹⁴⁴CAPCOA, *Quantifying Greenhouse Gas Mitigation Measures*, August 2010, pages 155-158.

provide medical office and retail-commercial uses;¹⁴⁵ therefore, this characteristic applies to the Project. The Project would increase the job density on the Project Site from approximately 63 jobs per acre (i.e., 48 existing jobs on 0.76 acres) to approximately 808 jobs per acre (i.e., 614 Project jobs on 0.76 acres). This land use characteristic is included as a land use strategy in SCAG's 2020-2045 RTP/SCS that supports a relative reduction in trips and VMT and associated air pollutant emissions and promotes sustainable growth, as compared to the air basin averages based on the default CalEEMod assumptions.¹⁴⁶

- CAPCOA LUT-2: Location Efficiency:** Location efficiency describes the location of a project relative to the type of urban landscape such as an Urban area, Compact Infill, or Suburban Center. In general, compared to the Statewide average, a project could realize VMT reductions up to 65 percent in an Urban area, up to 30 percent in a Compact Infill area, or up to 10 percent in a Suburban Center for land use/location strategies.¹⁴⁷ This characteristic corresponds to CAPCOA guidance strategy LUT-2, in which the relative reduction in VMT applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects.¹⁴⁸ The Project is located in an urban infill location within an identified HQTa and is a mixed-use development that provides medical office and retail-commercial uses; therefore, this characteristic applies to the Project. Factors that contribute to VMT reductions under this characteristic include the geographic regional location of a project. The Project Site represents an urban infill development where it is located within an active urban center with many existing off-site commercial and residential buildings. The Project Site is served by existing and future public transportation located within 0.5 mile, including four existing Metro bus routes (30/330, 20/720, 728 and 105/705) and one AVTA bus route (786), and the

¹⁴⁵ CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pages 59-60. The Project area meets the characteristics for an urban setting with respect to typical building heights of six stories or much higher, grid street pattern, minimal setbacks, constrained parking, high parking prices, location relative to regional cores (5 miles or less), and jobs/housing balance, where the Wilshire Community Plan Area 2019 jobs/housing ratio was approximately 1.3 (168,307 jobs/127,189 housing units).

¹⁴⁶ SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, pages 50-51.

¹⁴⁷ CalEEMod, by default, assumes that trip distances in the Air Basin are slightly longer than the Statewide average. This is due to the fact that commute patterns in the Air Basin involve a substantial portion of the population commuting relatively far distances, which is documented in SCAG's 2020-2045 RTP/SCS. The 2020-2045 RTP/SCS shows that, even under future Plan conditions, upwards of 58 percent of all work trips would be 10 miles or longer (SCAG, Performance Measures Appendix, page 17). The 2020-2045 RTP/SCS does not specify the current percentage of work trips greater than 10 miles in the region, but it can be assumed that the percentage is currently greater than 58 percent because the goal of the RTP/SCS is to reduce overall per capita VMT in the region. It is thus reasonable to assume that the trip distances in Air Basin are analogous to the Statewide average given that the default model trip distances in the Air Basin are slightly longer but still generally similar to the Statewide average. Therefore, projects could achieve similar levels of VMT reduction (65 percent in an urban area, 30 percent in a compact infill area, or 10 percent for a suburban center) compared to the Air Basin average.

¹⁴⁸ CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pages 159-161.

future Wilshire/La Cienega Metro D (Purple) Line Station, which is currently under construction and is anticipated to be operational in 2023.¹⁴⁹ The future Wilshire/La Cienega Metro D (Purple) Line Station, which is anticipated to be completed in 2023 at the corner of Wilshire Boulevard and La Cienega Boulevard, would be approximately 1,500 feet to the west of the Project Site. The location efficiency of the Project Site would result in synergistic benefits that would support a relative reduction in vehicle trips and VMT and would result in corresponding reductions in transportation-related emissions, as compared to the air basin averages based on the default CalEEMod assumptions. This land use characteristic is included as a land use strategy in SCAG's 2020-2045 RTP/SCS for supporting a relative reduction in trips and VMT, and associated air pollutant emissions, and promoting sustainable growth, as compared to the air basin averages based on the default CalEEMod assumptions.¹⁵⁰

- CAPCOA LUT-3: Increase Land Use Diversity and Mixed-Uses:** Locating different types of land uses near one another can decrease VMT because trips between land use types are shorter, one does not need to travel outside of the neighborhood to meet his/her trip needs, and trips could be accommodated by alternative modes of transportation, such as public transit, bicycles, and walking. This characteristic corresponds to CAPCOA guidance strategy LUT-3, in which the relative reduction in VMT applies to Urban and Suburban settings (also potentially for rural master-planned communities) for mixed-use projects.¹⁵¹ The Project is located in an Urban Infill location within an identified HQTa and is mixed-use; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the percentage of each land use type in the project. The Project would co-locate complementary medical office, retail, and other commercial land uses in close to proximity to existing off-site commercial/retail, office/medical-office, and residential uses. The increases in land use diversity and mix of uses on the Project Site would support a relative reduction in vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions, as compared to the air basin averages based on the default CalEEMod assumptions.
- CAPCOA LUT-4: Increase Destination Accessibility:** This characteristic corresponds to CAPCOA guidance strategy LUT-4, the reduction in VMT applies to urban and suburban settings for residential, retail, office, industrial, and mixed-use projects.¹⁵² The Project is located in an urban infill location within an identified HQTa and is a mixed-use development; therefore, this

¹⁴⁹Metro, Metro Purple Line Extension FAQs, <https://www.metro.net/projects/westside/>, accessed April 29, 2020.

¹⁵⁰SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, pages 51-52.

¹⁵¹CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pages 162-166.

¹⁵²CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pages 167-170.

characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the distance to downtown or major job center. The Project would be located in an area that offers access to multiple other nearby destinations including existing off-site restaurant, office, retail, entertainment, and residential uses. The Project Site is also located near other job centers in the region. Ready access to multiple destinations in close proximity to the Project Site would support a relative reduction in vehicle trips and VMT and encourage walking and non-automotive forms of transportation, and result in corresponding reductions in transportation-related emissions, as compared to the air basin averages based on the default CalEEMod assumptions. This land use characteristic is included as a land use strategy in SCAG's 2020-2045 RTP/SCS for reducing trips and VMT, and associated air pollutant emissions, and promoting sustainable growth.¹⁵³

- CAPCOA LUT-5: Increase Transit Accessibility:** Locating a project with high density near transit facilitates the use of transit by people traveling to or from the project. This characteristic corresponds to CAPCOA guidance strategy LUT-5, in which, the relative reduction in VMT applies to Urban and Suburban settings (also potentially for Rural settings adjacent to a commuter rail station with convenient access to a major employment center) for residential, retail, office, industrial, and mixed-use projects.¹⁵⁴ The Project is located in an urban infill location within an identified HQTa and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to VMT reductions under this characteristic include the distance to transit stations near the project. The Project would be located within 0.5 mile of public transportation, including four existing Metro bus routes (30/330, 20/720, 728 and 105/705) and one AVTA bus route (786), and within 1,500 feet of the future Wilshire/La Cienega Metro D (Purple) Line Station. The closest Metro bus stop is located at the intersection of South San Vicente Boulevard and Wilshire Boulevard, approximately 200 feet southeast of the Project Site. The closest existing Metro light rail station is a walking distance of approximately 3.5 miles from the Project Site; however, the future Wilshire/La Cienega Metro D (Purple) Line Station in 2023 at the corner of Wilshire Boulevard and La Cienega Boulevard, would be approximately 1,500 feet to the west of the Project Site. This new transit infrastructure will increase the available transit access for transit riders to utilize from the Project Site. The Project would provide access to on-site uses from existing pedestrian pathways along San Vicente Boulevard and Wilshire Boulevard. The Project would also provide 716 on-site bicycle parking spaces for short-term and long-term use to encourage utilization of alternative modes of transportation. The increased transit accessibility would reduce vehicle trips and VMT versus the Statewide

¹⁵³SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, May 2020, pages 50-51.

¹⁵⁴CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pages 171-175.

and Air Basin averages, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions. This land use characteristic is included as a land use strategy in SCAG's 2020-2045 RTP/SCS for reducing trips and VMT, and associated air pollutant emissions, and promoting sustainable growth.¹⁵⁵

- **CAPCOA LUT-9: Improve Design of Development:** Improved street network characteristics within a neighborhood enhances walkability and connectivity. Characteristics include street accessibility usually measured in terms of number of intersections (e.g., 4-way intersections) per square mile. This measure corresponds to CAPCOA guidance measure LUT-9, in which the relative reduction in VMT applies to Urban and Suburban settings for residential, retail, office, industrial, and mixed-use projects.¹⁵⁶ The Project is located in an urban infill location and is mixed-use; therefore, this measure applies to the Project. The Project would be located in a highly street-accessible area with approximately 42 four-way intersections within a 1-mile radius of the Project Site, which exceeds the standard intersection density assumed in baseline VMT modeling. The increased intersection density would support a relative reduction in vehicle trips and VMT, encourage walking and non-automotive forms of transportation, and would support a relative reduction in corresponding transportation-related emissions, as compared to the air basin averages based on the default CalEEMod assumptions.
- **CAPCOA SDT-1: Provide Pedestrian Network Improvements:** Providing pedestrian access that minimizes barriers and links the Project Site with existing or planned external streets encourages people to walk instead of drive. This characteristic corresponds to CAPCOA guidance strategy SDT-1, in which the reduction in relative VMT applies to Urban, Suburban, and Rural settings for residential, retail, office, industrial, and mixed-use projects.¹⁵⁷ The Project is located in an urban infill location within an identified HQT and is a mixed-use development; therefore, this characteristic applies to the Project. According to the CAPCOA guidance, factors that contribute to relative VMT reductions under this characteristic include pedestrian access connectivity within the project and to/from off-site destinations. As discussed in **Chapter II, Project Description**, pedestrian access to the Project Site from surrounding neighborhoods to the retail-commercial uses would be from the Sweetzer Avenue and South San Vicente Boulevard street frontages. Access to the office uses would be from the ground level lobby for the office building along South San Vicente Boulevard and from the parking levels via internal stairs and elevators. In summary, the Project would provide an internal pedestrian network for Project visitors and employees that links to the existing off-site pedestrian network, including existing off-site sidewalks, supports a relative, small reduction in VMT and associated transportation-related emissions, as compared to the air basin averages based

¹⁵⁵SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, pages 50-51.

¹⁵⁶CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pages 182-185.

¹⁵⁷CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, August 2010, pages 186-189.

on the default CalEEMod assumptions. This land use characteristic is included as a land use strategy in SCAG's 2020-2045 RTP/SCS for supporting a relative reduction in trips and VMT, and associated air pollutant emissions, and promoting sustainable growth, as compared to the air basin averages based on the default CalEEMod assumptions.¹⁵⁸

By locating the Project's proposed medical office and retail uses within an area that has existing high quality public transit (with access to existing regional bus and future rail service), employment opportunities, restaurants and entertainment, all within walking distance, and by including features that support and encourage pedestrian activity and other non-vehicular transportation and increased transit use in the Wilshire Community Plan area, the Project would reduce vehicle trips and VMT, and resulting air pollution and GHG emissions. Therefore, by developing a land use pattern that promotes sustainability, the Project's characteristics developed at its location would achieve many of the objectives of SCAG's 2020-2045 RTP/SCS.

As discussed in the above analysis and in **Table IV.E-5, Consistency with Applicable SCAG 2020-2045 RTP/SCS Actions and Strategies**, the Project would be consistent with and support the goals and benefits of the 2020-2045 RTP/SCS that are potentially applicable to the Project. As a result, the Project would be consistent with, and would not conflict with, applicable 2020-2045 RTP/SCS actions and strategies to reduce GHG emissions.

TABLE IV.E-5
CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Actions and Strategies		
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions, COGs, SCAG, CTCs	No Conflict. This action applies to local jurisdictions, COGs, SCAG and County Transportation Commissions (CTCs). While the use of alternative-fueled vehicles is beyond the direct control or influence of the Project, the Project would encourage the use of alternative-fueled vehicles by designating a minimum of eight percent of on-site parking for carpool and/or alternative-fueled vehicles. In addition, the Project design provides for the installation of the conduit and panel capacity to accommodate future EVSE into a minimum of 30 percent of the parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations.

¹⁵⁸SCAG, Connect SoCal: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, September 2020, pages 51-52.

TABLE IV.E-5
CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions, SCAG	<p>No Conflict. While this action applies to local jurisdictions and SCAG, the Project would facilitate pedestrian and bicycle movements by providing convenient access to and from on-site uses. Pedestrian access to the retail-commercial uses would be from the Sweetzer Avenue and South San Vicente Boulevard street frontages. Access to the office uses would be from the ground level lobby for the office building along South San Vicente Boulevard and from the parking levels via internal stairs and elevators. The Project would locate office, retail and restaurant uses on an infill Project Site located within a highly-walkable area of the Wilshire Community Plan area that has public transit (with access to existing regional and local bus service), and employment opportunities, restaurants and entertainment all within walking or bicycling distance. The Project would also provide 716 bicycle parking spaces onsite to encourage utilization of alternative modes of transportation area.</p>
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	<p>No Conflict. While this action applies to local jurisdictions, the Project would support this action/strategy by creating a mixed-use commercial-retail infill development comprising complementary uses that offer employment and other community-serving opportunities. The Project supports the development of complete communities by: co-locating complementary medical office, retail, and restaurant land uses on an infill Project Site that is in close proximity to existing off-site commercial and residential uses; being located within 0.25 miles of off-site commercial and residential uses; and being located within an identified HQTa in a highly walkable area served by frequent and comprehensive transit within a 0.5 mile of the Project Site. The Project would redevelop a low-production and low job-generating educational and low-density commercial use, and generate new high quality employment opportunities associated with the commercial uses and offers benefits, such as healthcare and retail/commercial services to nearby residents that the existing educational and commercial uses did not. The Project would provide a range of high-quality employment opportunities in the Wilshire Community Plan area. The change from low-</p>

TABLE IV.E-5
CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
<p>Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance.</p>	<p>Local Jurisdictions, SCAG</p>	<p>density educational and commercial uses to mixed-use, high-density commercial projects that is occurring within the Wilshire Community Plan Area, would support the applicable plans and goals to revive properties within.</p> <p>No Conflict. While this action applies to local jurisdictions and SCAG, the Project supports the development of complete communities by providing the community with a diversity of services and jobs by co-locating complementary medical office, retail, and restaurant land uses on a Project Site that is within 0.25 miles of existing off-site commercial and residential uses ; and being located within an identified HQTa in a highly walkable area served by frequent and comprehensive transit within 0.5 miles of the Project Site. The increases in land use density on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.</p>
<p>Pursue joint development opportunities to encourage the development of housing and-mixed use projects around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas.</p>	<p>Local Jurisdictions, CTCs</p>	<p>No Conflict. While this action applies to local jurisdictions and CTCs, the Project is a mixed-use commercial development on an infill site located within an identified HQTa and located within 0.5 miles of existing and potential future planned public transportation. The Project would provide access to on-site uses from existing pedestrian pathways. The Project would be located within 0.5 miles of public transportation, including four existing Metro bus routes (30/330, 20/720, 728 and 105/705) and one AVTA bus route (786), and within 1,500 feet of the future Wilshire/La Cienega Metro D (Purple) Line Station. The closest Metro bus stop is located at the intersection of South San Vicente Boulevard and Wilshire Boulevard, approximately 200 feet southeast of the Project Site. The closest existing Metro light rail station is approximately 3.5 miles from the Project Site; however, the future Wilshire/La Cienega Metro D (Purple) Line Station in 2023 at the corner of Wilshire Boulevard and La Cienega Boulevard, would be approximately 1,500 feet to the west of the Project Site. This new transit infrastructure will increase the available transit access for transit riders to utilize from the Project Site. Additionally, the Project would co-locate its complementary medical office, retail, and</p>

TABLE IV.E-5
CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	<p>restaurant land uses, which are in proximity to existing off-site commercial and residential uses.</p> <p>No Conflict. While this action applies to the State and SCAG, the Project would be consistent with and would not conflict with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs through infill development. The Project is a dense mixed-use commercial development located on an urban infill Project Site within an identified HQT. The Project co-locates its complementary medical office, retail, and restaurant land uses, which are in proximity to existing off-site commercial and residential uses. The Project is also located in a highly walkable area served by frequent and comprehensive transit within 0.5 miles of the Project Site. The increases in land use intensity and diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions.</p>
Transportation Network Actions and Strategies		
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG, CTCs, Local Jurisdictions	<p>No Conflict. While this action applies to local jurisdictions, SCAG and CTCs, the Project's mixed-use development would intensify development in an area directly served by four existing Metro bus routes (30/330, 20/720, 728 and 105/705) and one AVTA bus route (786). The closest Metro bus stop is located at the intersection of South San Vicente Boulevard and Wilshire Boulevard, approximately 200 feet southeast of the Project Site. The closest existing Metro light rail station is a walking distance of approximately 3.5 miles from the Project Site; however, entrances to the future Wilshire/La Cienega Metro D (Purple) Line Station would be within 1,500 feet of the Project Site. Furthermore, the Project would provide its high-density medical office, retail, and restaurant uses in an area with pedestrian access to a large range of existing entertainment and commercial uses opportunities.</p>

TABLE IV.E-5
CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media.	Local Jurisdictions	No Conflict. While this action applies to local jurisdictions and CTCs, the Project's land use characteristics, including its Increased Transit Accessibility, would encourage increased use of transit. Additionally, the Project's TDM Program, as provided in Project Design Feature TRAF-PDF-1 in Section IV.I, Transportation , of this Draft EIR, would include a variety of measures that would promote transit use by visitors and employees through incentives, including transit fare discounts and a ride-sharing program. Refer to Section IV.I, Transportation , of this Draft EIR, for information regarding the TDM Program.
Transportation Demand Management (TDM) Actions and Strategies		
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	No Conflict. While this action applies to local jurisdictions and SCAG, the Project is proposed on an infill location, would incorporate pedestrian pathways that connect to the existing sidewalk network, and would provide bicycle parking spaces and facilities, which would encourage active transportation such as walking and biking. The Project would improve pedestrian connectivity to and the pedestrian experience in the surrounding by providing pedestrian access to existing off-site residential, office, retail, and restaurant by providing convenient access to and from on-site uses. Additionally, the Project's TDM Program, as provided in Project Design Feature TRAF-PDF-1 in Section IV.I, Transportation , of this Draft EIR, would include a variety of measures that would promote transit use by visitors and employees through incentives, including transit fare discounts and a ride-sharing program. Refer to Section IV.I, Transportation , of this Draft EIR, for information regarding the TDM Program.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	No Conflict. While this action applies to local jurisdictions and CTCs, the telecommuting programs for the Project's uses will depend on the office tenants that occupy those uses. Thus, the Project would not impact or conflict with the City's ability to encourage telecommuting.

TABLE IV.E-5
CONSISTENCY WITH APPLICABLE SCAG 2020-2045 RTP/SCS ACTIONS AND STRATEGIES

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Clean Vehicle Technology Actions and Strategies		
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. The activities committed in the two subregions (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future.	SCAG, Local Jurisdictions	No Conflict. While this action applies to local jurisdictions and SCAG, the Project would not interfere with the City's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. Specifically, the Project would support a land use pattern that provides increased opportunities to use alternative transportation modes.

SOURCE: ESA, 2020.

(iii) *L.A.'s Green New Deal (Sustainability pLAn 2019)*

The significance of the Project's GHG emissions is next evaluated based on whether they would be generated in connection with a design that is consistent with and would not conflict with relevant City goals and actions designed to encourage development that results in the efficient use of public and private resources. One such set of goals and actions is contained in the Mayor's Green New Deal. While not a plan adopted solely to reduce GHG emissions, within the Green New Deal, climate mitigation is one of eight explicit benefits that help define its strategies and goals. **Table IV.E-6, Comparison of Project Characteristics to Applicable City of Los Angeles Green New Deal GHG Emissions Goals and Actions**, contains a list of GHG emission-reducing strategies applicable to the Project. The analysis describes the consistency of the Project with these GHG emissions-reduction goals and actions. As discussed in Table IV.E-6, the Project would be consistent with and would not conflict with the applicable goals and actions of these plans. In addition, as discussed below, the Project would also result in GHG reductions beyond those specified by the City and would minimize its GHG emissions by incorporating energy efficient design features and VMT reduction characteristics. Therefore, as the Project's GHG emissions would be generated in connection with a development located and designed to be consistent with the applicable City plan goals and actions for reducing GHG emissions, the Project would not conflict with these City plans adopted for the purpose of reducing GHG emissions, and the Project's GHG emissions would result in less than significant impacts.

As this analysis demonstrates, the Project would be consistent with and would support goals and targets of the Green New Deal.

(iv) Los Angeles Green Building Code

The Project would comply with the Los Angeles Green Building Code's intent to reduce GHG emissions by complying with energy-efficiency requirements, incorporating water efficiency measures Code, installing energy-efficient appliances and equipment, and complying with the 2019 California Title 24 Building Energy Efficiency Standards, as amended by the City. The Project would be designed to optimize energy performance and reduce building energy cost for new construction, which would meet the minimum building energy performance standards of the Los Angeles Green Building Code. The Project would also fulfill the mandatory requirements of the CALGreen Code as amended by the City by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The HVAC system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. Therefore, the Project would be consistent with the Los Angeles Green Building Code.

TABLE IV.E-6
COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL GHG EMISSIONS GOALS AND ACTIONS

Target	Project Consistency
Chapter 3: Local Water	
Reduce potable water use per capita by 22.5 percent by 2025; 25 percent by 2035; and maintain or reduce 2035 per capita water use through 2050.	While this action primarily applies to the City and LADWP and not to individual projects, the Project design incorporates water efficiency measures via compliance with the City's requirements and the CALGreen Code.
Chapter 4: Clean and Healthy Buildings	
Reduce building energy use per square feet for all building types 22 percent by 2025; 34 percent by 2035; and 44 percent by 2050 (from a baseline of 68 mBTU/square feet in 2015).	While this action applies to City departments and not to private development, the Project is designed and would operate to meet or exceed the applicable requirements of the CALGreen Code and the Los Angeles Green Building Code.
All new buildings will be net zero carbon by 2030 and 100 percent of buildings will be net zero carbon by 2050.	While this action primarily applies to the City, the Project would comply with the State's and City's requirements that are designed to reduce GHG emissions over time, including the Los Angeles Green Building Code, Title 24, and other increasingly stringent energy conservation programs. In addition, The Project would help the City move toward a net zero carbon future.

TABLE IV.E-6
COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS
ANGELES GREEN NEW DEAL GHG EMISSIONS GOALS AND ACTIONS

Target	Project Consistency
Chapter 6: Mobility & Public Transit	
Increase the percentage of all trips made by walking, biking, micro-mobility/matched rides or transit to at least 35 percent by 2025, 50 percent by 2035, and maintain at least 50 percent by 2050.	While this action applies primarily to the City, the Project would encourage the use of transit by being served by existing and future public transportation located within 0.5 miles, including four existing Metro bus routes (30/330, 20/720, 728 and 105/705) and on AVTA bus route (786), and the future Wilshire/La Cienega Metro D (Purple) Line Station, which is currently under construction and is anticipated to be operational in 2023. The Project would encourage walking by being designed to be accessible by locating complementary medical office, retail and restaurant uses on an infill Project Site located within a highly-walkable area of the Wilshire Community Plan area that has public transit (with access to existing regional and local bus service), and employment opportunities, restaurants and entertainment all within walking or bicycling distance. The Project would encourage bicycling by providing 716 bicycle parking spaces on-site to encourage utilization of alternative modes of transportation.
Reduce VMT per capita by at least 13 percent by 2025; 39 percent by 2035; and 45 percent by 2050.	While this action applies to the City and not to individual projects, as indicated in the VMT analysis in Section IV.I, Transportation , of this Draft EIR, the results of the analysis show that with the Project, the employee VMT per capita would be 7.5 compared to the threshold of 7.6. Therefore, the Project would not cause significant VMT impacts.
Chapter 7: Zero Emission Vehicles	
Increase the percentage of electric and zero emission vehicles in the city to 25 percent by 2025; 80 percent by 2035; and 100 percent by 2050.	While this action applies to the City and not to individual projects, the Project would encourage the use of EV by providing parking spaces capable of supporting EVSE as required in by the City for a minimum of 30 percent of the Code-required parking spaces, with 10 percent of the Code-required spaces further improved with electric vehicle charging stations.
Chapter 9: Waste & Resource Recovery	
Increase landfill diversion rate to 90 percent by 2025; 95 percent by 2035 and 100 percent by 2050.	While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service that may include mixed waste processing, and that yields waste diversion results comparable to source separation and consistent with and would not conflict with Citywide recycling targets.

TABLE IV.E-6
COMPARISON OF PROJECT CHARACTERISTICS TO APPLICABLE CITY OF LOS ANGELES GREEN NEW DEAL GHG EMISSIONS GOALS AND ACTIONS

Target	Project Consistency
Reduce municipal solid waste generation per capita by at least 15 percent by 2030, including phasing out single-use plastics by 2028 (from a baseline of 17.85 lbs. of waste generated per capita per day in 2011).	While this action applies to the City and not to individual projects, the Project would be served by a solid waste collection and recycling service which would participate in City trash services, including separating trash from recycling through the use of blue and green recycling bins provided by the LA Sanitation Department.
Eliminate organic waste going to landfill by 2028.	While this action applies to City, the Project, which consists of a mixed-use development, would support this by participating in City trash services, including the participation in the organic waste recycling program.
Chapter 11: Urban Ecosystems & Resilience	
Reduce urban/rural temperature differential by at least 1.7 degrees by 2025; and 4degrees by 2035.	As noted in Chapter II, Project Description , of this Draft EIR, Floors 6 through 10 would include small terraced landscaped patios that would be provided overlooking South San Vicente Boulevard that would be exclusively used by the building tenants. The terraced landscaped areas on Floors 6 through 10 would serve as partial green roofs that would serve to help cool the building, and would include sustainable paving materials that would minimize the urban heat island effect.
SOURCE: City of Los Angeles, L.A.'s Green New Deal (Sustainable City pLAn 2019), 2019; ESA, 2020.	

(v) *Conclusion*

In conclusion, the Project's consistency with applicable GHG reduction plans and policies plan as presented in the discussions above and in Table IV.E-4, Table IV.E-5, and Table IV.E-6 demonstrate that the Project is consistent with regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the 2017 Scoping Plan, 2020-2045 RTP/SCS, the City's Green New Deal, and the Los Angeles Green Building Code. **As such, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Therefore, impacts would be less than significant.**

(b) *Greenhouse Gas Emissions*

(i) *Construction Emissions*

The emissions of GHGs associated with construction of the Project were calculated for each year of construction activity using CalEEMod. Results of the

GHG emissions calculations are presented on **Table IV.E-7, *Estimated Unmitigated Construction Greenhouse Gas Emissions***. The GHG emissions shown in Table IV.E-7 are based on construction equipment operating continuously throughout the work day. In reality, construction equipment tends to operate periodically or cyclically throughout the work day. Therefore, the GHG emissions shown reflect a conservative estimate.

SCAQMD recommends that construction-related GHG emissions be amortized over a project's 30-year lifetime in order to include these emissions as part of a project's annualized lifetime total emissions, so that GHG reduction measures will address construction GHG emissions as part of a project's overall GHG reduction strategies. In accordance with this methodology, the estimated construction GHG emissions have been amortized over a 30-year period and included in the annualized operational GHG emissions.

TABLE IV.E-7
ESTIMATED UNMITIGATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

Emission Source	CO₂e (Metric Tons) ^{a,b}
<i>Off-Road 2021</i>	<i>1,130</i>
<i>Off-Road 2022</i>	<i>1,042</i>
<i>Off-Road 2023</i>	<i>861</i>
Total Off-Road	3,033
Total On-Road	1,757
Total	4,790
Amortized Over 30 Years	160

^a Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B of this Draft EIR.

^b CO₂e emissions are calculated using the global warming potential values from the IPCC AR4.

SOURCE: ESA, 2020.

(ii) *Operational Emissions*

The Project's annual GHG emissions included emissions from operations and construction calculated by CalEEMod. As previously described, construction GHG emissions for the entire construction period were amortized over 30 years. The Project must comply with the provisions of the Los Angeles Green Building Code and State's CALGreen Code/California Title 24 Building Energy Efficiency requirements applicable to the Project, and meeting these requirements are assumed in the quantitative analysis below and includes building energy demand under the 2019 Title 24 standards.

As explained above, the Project's mobile source emissions are calculated using the VMT from the Project Transportation Assessment prepared by Gibson Transportation Consulting, Inc.¹⁵⁹ The trip lengths are based on the location and urbanization of the Project area. The Project's mobile source emissions are calculated based on the Project's VMT, which accounts for trip reductions from internal capture, existing public transportation options, and pass-by trips, and incorporates Project Design Feature TRAF-PDF-1, the Project's TDM Program, (refer to **Section IV.I, Transportation**, of this Draft EIR, for a discussion of the transportation demand management features).

As discussed above, the Project Site's land use characteristics and the Project's Transportation Assessment demonstrate that the Project's VMT would be reduced compared to a standard non-infill project and based on its location efficiency. The total VMT reduction taken due to the land use characteristics was 26 percent due trip reductions from internal capture, existing public transportation options, and pass-by trips.^{160,161} In addition, the Project's Transportation Assessment demonstrates that the Project's VMT would be further reduced by approximately 12 percent due to the Project's TDM Program. Therefore, the total VMT reduction taken due to the land use characteristics and the TDM Program combined is approximately 38 percent.

Maximum annual net GHG emissions resulting from on-road mobile sources, stationary sources (i.e., emergency generator, area sources (i.e., landscape maintenance equipment), energy (i.e., electricity, natural gas), water conveyance and wastewater treatment, and solid waste were calculated for the anticipated Project operational year (2023). The Project's total and net GHG emissions from operation of the Project are shown in **Table IV.E-8, Estimated Unmitigated Operational Greenhouse Gas Emissions**.

¹⁵⁹Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

¹⁶⁰Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

¹⁶¹The total Project trip and VMT reductions due to internal capture, existing public transportation options, and pass-by trips were estimated based on using the total Project daily trip values and average trip length from the LADOT VMT Calculator outputs for the Project, as provided in Appendix D of the Transportation Assessment. The Project trips were multiplied by the percentage of trips per land use based on the combined morning and afternoon peak hour trip values to determine the number of daily trips per land use. Then, for each land use, the reductions due to internal capture, existing public transportation options, and pass-by trips were back calculated to account for each successive percentage reduction per land use type. To avoid double counting, reductions are not added together and the trip reductions for each successive measure are applied only to the "remaining" trips after the reductions from the previous measure have been deducted. The trip reductions across the land uses were then totaled and multiplied by the average trip length to determine the total Project VMT reductions due to internal capture, existing public transportation options, and pass-by trips for the Project. These calculations are provided in Appendix B-2.

TABLE IV.E-8
ESTIMATED UNMITIGATED OPERATIONAL GREENHOUSE GAS EMISSIONS

Emissions Sources	CO ₂ e at Buildout Year (2023) (Metric Tons per Year) ^a	
	Project Without GHG Reduction Characteristics, Features, and Measures	Project With GHG Reduction Characteristics, Features, and Measures
Mobile Sources	5,316	3,277
Emergency Generators	8	8
Area	<1	<1
Electricity	782	656
Natural Gas	128	127
Water and Wastewater Treatment	92	83
Solid Waste	25	25
EV Charging Stations	79	69
Construction (Amortized)	160	160
Project Subtotal	6,590	4,405
Existing Site (refer to Table IV.E-3)	380	380
Net Total (Project minus Existing)	6,210	4,025

^a Totals may not add up exactly due to rounding in the modeling calculations.

SOURCE: ESA, 2020.

As discussed previously, State, regional, and local GHG reduction plans and policies, such as CARB's Climate Change Scoping Plan, 2020-2045 RTP/SCS, and L.A.'s Green New Deal would be applicable to the Project. These plans and policies are intended to reduce GHG emissions in accordance with the goals of AB 32. In order to evaluate the efficacy of the GHG reduction characteristics, features, and measures that would be implemented as part of the Project as required by these GHG reduction plans and policies, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. This comparison is provided to evaluate the Project's efficiency with respect to GHG emissions but is not the threshold of significance used for impact analysis. The analysis assumes the Project without implementation of GHG reduction characteristics, features, and measures would incorporate the same land uses and building square footage as the Project, and does not include certain VMT reductions

from the Project's Transportation Assessment which accounts for trip reductions from internal capture, existing public transportation options, pass-by trips, or reductions resulting from the Project's TDM program.¹⁶²

While other methodologies for calculating Project GHG reduction efficiencies exist, a comparison of Project GHG reduction efforts compared to a Project without Reduction Features scenario provides valuable information regarding the efficiency of the Project's GHG reduction features and is presented here for informational purposes only. This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction features. It is not a threshold of significance, and is not used as the basis for any significance finding. Furthermore, this analysis is consistent with the most current regulatory policies and GHG quantification methods; however, the scientific, regulatory environment regarding GHG reduction, and CEQA approaches for GHG analysis are constantly evolving and will continue to do so into the future.

The quantification of GHG emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures is based on specific and defined circumstances in the context of relevant State activities and mandates. The GHG emissions for the Project without Reduction Features scenario are evaluated based on the specific and defined circumstances that CARB relied on when it projected the State's GHG emissions in the absence of GHG reduction measures in the 2014 Scoping Plan and 2017 Scoping Plan. Furthermore, the specific Project and Project Site characteristics as described in the Project's Transportation Assessment, including the Project being a multi-use development, its close proximity to other off-site retail, restaurant, entertainment, commercial, and job destinations, and being near existing public transportation options.¹⁶³ Project design features such as Project Design Feature TRAF-PDF-1 (TDM Program, refer to **Section IV.I, Transportation**, of this Draft EIR) are not included as they encompass GHG reduction strategies and features that would be consistent with State, regional, and local GHG reduction plans and policies or would go above and beyond regulatory requirements. The emissions are estimated using the CalEEMod software, and the model inputs are adjusted to account for the specific and defined circumstances and described above. The analysis assumes the Project without implementation of GHG reduction characteristics, features, and measures and would incorporate the same land uses and building square footage as the proposed Project. In addition, mobile emissions would not incorporate certain VMT reductions from the Project's Transportation Assessment and the TDM trip reductions.

¹⁶²Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

¹⁶³Gibson Transportation Consulting, Inc., Transportation Assessment for the 656 San Vicente Medical Office Project, November 2020.

When considering only the Project's emissions, Table IV.E-8 show that the Project's net operational emissions of 4,025 MTCO_{2e} in 2023 would be approximately 35 percent below the emissions that would be generated by the Project without implementation of GHG reduction characteristics, features, and measures. Thus, this analysis quantitatively demonstrates the efficiency of the Project GHG reduction measures as set forth in the applicable GHG reduction plans and policies. The 35 percent reduction in emissions for (i.e., Project scenario and Project without Reduction Features scenario) is due to the following primary factors:

- Reduction in vehicle trips and VMT associated with the Project's land use characteristics.** As discussed above, based on the Project's Transportation Assessment and the CAPCOA guidance document, Project related reductions in trip generation and VMT are expected due to the Project's trip reductions from internal capture, existing public transportation options, and pass-by trips, as well as the Projects TDM Program. For the Project, these characteristics account for approximately a 38 percent reduction in VMT and an approximately 33 percent reduction in total GHG emissions in the first operational year of 2023.
- Lower carbon intensity of electricity.** Under the Renewables Portfolio Standard, LADWP is required to reduce the carbon intensity of their electricity. The carbon intensity of LADWP electricity is 758.8 lbs/MWh for the Project without implementation of GHG reduction characteristics, features, and measures scenario. As discussed above, the future year CO₂ emission factor of 657.8 lbs/MWh, used for 2023, was scaled proportionately based on the future year renewable energy targets of 44 percent by 2024, refer to Appendix B for additional details).¹⁶⁴ For the Project, these features account for approximately a 16 percent reduction in electricity emissions and an approximately two percent reduction in total GHG emissions in the first operational year of 2023.

It is important to note that the total net Project emissions in Table IV.E-8 do not reflect that Project operational-related GHG emissions would likely decline in future years, as emissions reduction plans, policies and regulations at the State, regional, and local level (including the 2017 Scoping Plan and 2020-2045 RTP/SCS, discussed above) are achieved, and as the State's Cap-and-Trade program is continued. Emissions related to electricity would decline as utility providers, including LADWP, meet their RPS obligations to provide electricity from 33 percent renewable electricity sources by 2020, 60 percent by the end of 2030, and 100 percent by the end of 2045. Emissions from mobile sources would also decline in future years as older vehicles are replaced with newer vehicles, resulting in a greater percentage of the vehicle fleet meeting more stringent combustion

¹⁶⁴LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017.

emissions standards, such as the model year 2017-2025 Pavley Phase II standards.

(iii) *Post Buildout Emissions*

Executive Orders S-3-05 and B-30-25 establish a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal has not been codified by the Legislature and CARB has not adopted a strategy or regulations to meet the 2050 goal. However, studies have shown that, in order to meet the 2050 goal, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its original 2008 Scoping Plan, CARB acknowledged that the “measures needed to meet the 2050 goal are too far in the future to define in detail.”¹⁶⁵ In the 2014 Scoping Plan, CARB generally described the type of activities required to achieve the 2050 target: “energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately.”¹⁶⁶ The 2017 Scoping Plan recognizes that additional work is needed to achieve the more stringent 2050 target: “While the Scoping Plan charts the path to achieving the 2030 GHG emissions reduction target, we also need momentum to propel us to the 2050 Statewide GHG target (80 percent below 1990 levels). In developing this Scoping Plan, we considered what policies are needed to meet our mid-term and long-term goals.”¹⁶⁷ For example, the 2017 Scoping Plan acknowledges that “though Zero Net Carbon Buildings are not feasible at this time and more work needs to be done in this area, they will be necessary to achieve the 2050 target. To that end, work must begin now to review and evaluate research in this area, establish a planning horizon for targets, and identify implementation mechanisms.”¹⁶⁸

- **Energy Sector:** Continued improvements in California’s lighting, appliance, and building energy efficiency programs and initiatives, such as the State’s building energy efficiency standards and zero net energy building goals, would serve to reduce the Project’s emissions level.¹⁶⁹ Additionally, further technological improvements and additions to California’s renewable resource portfolio would favorably influence the Project’s emissions level.¹⁷⁰

¹⁶⁵CARB, Climate Change Scoping Plan, December 2008, page 117.

¹⁶⁶CARB, First Update to the Climate Change Scoping Plan, May 2014, page 32.

¹⁶⁷CARB, California’s 2017 Climate Change Scoping Plan, November 2017.

¹⁶⁸CARB, California’s 2017 Climate Change Scoping Plan, November 2017.

¹⁶⁹CARB, First Update to the Climate Change Scoping Plan, May 2014, pages 37-39 and 85.

¹⁷⁰CARB, First Update to the Climate Change Scoping Plan, May 2014, pages 40-41.

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.¹⁷¹
- **Water Sector:** The Project's emissions level will be reduced as a result of further enhancements to water conservation technologies.¹⁷²
- **Waste Management Sector:** Plans to further improve recycling, reuse, and reduction of solid waste will beneficially reduce the Project's emissions level.¹⁷³

The Project's GHG analysis was prepared after thorough investigation of feasible methodologies to determine the potential GHG impacts associated with the Project. Due to the technological shifts required and the unknown parameters of the regulatory framework in 2050, quantitatively analyzing the Project's impacts relative to the 2050 goal is speculative for purposes of CEQA. Despite the thorough investigation performed, due to the uncertainty regarding specific State and local actions that will be implemented to achieve the 2050 GHG emission reduction targets, calculating Project emissions levels for 2050 would be highly speculative. Nonetheless, Statewide efforts are underway to facilitate the State's achievement of those goals and it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at buildout represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Orders' goals.

(iv) Conclusion

As set forth above, the Project would generate incrementally increased GHG emissions over existing conditions. However, even a very large individual project would not generate enough GHG emissions on its own to significantly influence global climate change. Moreover, as also discussed above, the Project would be consistent with the 2017 Scoping Plan, 2020-2045 RTP/SCS, the City's Green New Deal, and Los Angeles Green Building Code. The Project's consistency with these applicable regulatory plans and policies to reduce GHG emissions, along with implementation of transportation related project design features as discussed in this Draft EIR, in **Subsection IV.E.3.c), Project Design Features**, would serve to reduce the Project's GHG emissions. In summary, the plan consistency analysis provided above demonstrates that the Project's design features are consistent with

¹⁷¹CARB, First Update to the Climate Change Scoping Plan, May 2014, pages 55-56.

¹⁷²CARB, First Update to the Climate Change Scoping Plan, May 2014, page 65.

¹⁷³ CARB, First Update to the Climate Change Scoping Plan, May 2014, page 69.

regulations and policies and comply with or exceed the regulations and reduction actions/strategies outlined in the 2017 Scoping Plan, 2020-2045 RTP/SCS, L.A.'s Green New Deal, and the Los Angeles Green Building Code.

Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Therefore, impacts with regard to GHG emissions would be less than significant.

(2) Mitigation Measures

Impacts regarding GHG emissions and conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance After Mitigation

Impacts regarding GHG emissions and conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs were determined to be less than significant without mitigation. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

e) Cumulative Impacts

(1) Impact Analysis

Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing Statewide emissions to 1990 levels by 2020 and reducing Statewide emissions to 40 percent below 1990 levels by 2030, even though Statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce Statewide GHG emissions. Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions.

Therefore, consistent with CEQA Guidelines Section 15064h(3), the City, as lead agency, has determined that a project's contribution to cumulative GHG emissions and global climate change would be less than significant if the project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: AB 32 Climate Change Scoping Plan, SCAG's 2020-2045 RTP/SCS, L.A.'s Green New Deal, and the Los Angeles Green Building Code.¹⁷⁴

Table IV.E-8 illustrates that implementation of the Project's regulatory requirements and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from the Project without Reduction Features scenario and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in CARB's Climate Change Scoping Plan for the implementation of AB 32.

The Project is consistent with the approach outlined in CARB's Climate Change Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Climate Change Scoping Plan, the Project would use "green building" features as a framework for achieving GHG emissions reductions.

As part of SCAG's 2020-2045 RTP/SCS, a reduction in VMT within the region is a key component to achieving the 2035 GHG emission reduction targets established by CARB. As discussed previously, the Project Site's land use characteristics and the Project's Transportation Assessment demonstrate that the Project's VMT would be reduced compared to a standard non-infill project and based on its trip reductions from internal capture, existing public transportation options, and pass-by trips, and incorporation of the Project's TDM Program.

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided throughout this Draft EIR and project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, compared to the Project without Reduction Features scenario, these features

¹⁷⁴As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction program renders a cumulative impact insignificant. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, [and] plans or regulations for the reduction of greenhouse gas emissions."

account for approximately a 35 percent reduction in total GHG emissions in the first operational year of 2023.

As discussed in **Section IV.A, Air Quality**, and in **Section IV.F, Land Use and Planning**, of this Draft EIR, the Project would be consistent with applicable land use policies of the City of Los Angeles and SCAG pertaining to air quality, including reducing GHG emissions.

The Project also would comply with L.A.'s Green New Deal, as shown in Table IV.E-6, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project would also comply with the Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, and increasing renewable energy generation. The Project's regulatory requirements and project design features provided above and throughout this Draft EIR would advance these objectives. Furthermore, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., Los Angeles Green Building Code).

As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The comparison of the Project's emissions to a scenario without GHG reduction features demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Trade Program, that Program would indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions if California's direct regulatory measures reduce GHG emissions less than expected. The Cap-and-Trade Program will ensure that the GHG reduction targets of AB 32 and SB 32 are met.

The 2017 Scoping Plan demonstrates that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030. Even though the 2017 Scoping Plan and supporting documentation do not provide an exact regulatory and technological roadmap to achieve the 2050 goal, they demonstrated that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require CARB to ensure that Statewide GHG are reduced to 40 percent below the 1990 emissions level by 2030. As discussed above, the new plan, outlined in SB 32, involves 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.

Thus, given the Project's consistency with State, SCAG, and City GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

(2) Mitigation Measures

Cumulative impacts regarding GHG emissions would be less than significant. Therefore, no mitigation measures are required.

(3) Level of Significance after Mitigation

Cumulative impacts regarding GHG emissions were determined to be less than significant. Therefore, no mitigation measures were required or included, and the impact level remains less than significant.

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