

## **4.9 ENERGY AND GREENHOUSE GAS EMISSIONS**

The analysis in this section provides focused updates to Chapter 4.15 in the 2011 Comprehensive Land Use Update Program Environmental Impact Report, with an emphasis on potential greenhouse gas (GHG) impacts that may change as a result of the Focused General Plan Update (FGPU).

This section evaluates potential GHG emissions impacts associated with buildout of the FGPU. As discussed in Chapter 3.0 Project Description, the FGPU includes focused updates to the City's Land Use, Transportation, and Safety Elements; Municipal Code and Zoning Map amendments; updates to specific plans; and an update to its adopted 2011 Climate Action Plan (CAP). More specifically, zoning changes would allow additional residential, commercial (retail/office), and mixed-use development within certain Focus Areas and are estimated to result in the future buildout of 595 additional residential dwelling units and 198,688 square feet of commercial and office space. Implementation of the FGPU would also include a number of mobility improvements within existing road rights-of-way. This GHG analysis evaluates potential effects associated with cumulative GHG emissions generated by buildout of future development in the Planning Area, in accordance with the FGPU. In accordance with the California Environmental Quality Act (CEQA), this section evaluates the significance of project impacts in terms of (1) contribution of GHG emissions to cumulative statewide emissions and (2) consistency with local and State regulations, plans, and policies aimed at reducing GHG emissions. GHG modeling was completed in conjunction with the CAP for buildout of the FGPU. The CAP and emissions modeling methodology are contained in Appendix 13.B.6 of this Supplemental Program Environmental Impact Report (SPEIR).

### **4.9.1 Existing Conditions**

GHGs are both natural and anthropogenic constituents of the atmosphere that absorb and emit radiation. The greenhouse effect is a phenomenon whereby GHGs are trapped in the atmosphere, which regulates the earth's temperature, maintaining a habitable climate. Increased concentrations of GHGs in the atmosphere are associated with climate change, which results in adverse environmental effects. Climate change includes significant changes in temperature, precipitation, and wind patterns. According to the Intergovernmental Panel on Climate Change's 2022 Sixth Assessment Report, without limiting global warming to 1.5 degrees Celsius above pre-industrial levels, key risks to North America are expected to intensify rapidly by the mid-21st century. Long-term adaptation actions that reduce risk and increase resilience can address rapidly escalating impacts in the mid- to latter part of the 21st century.

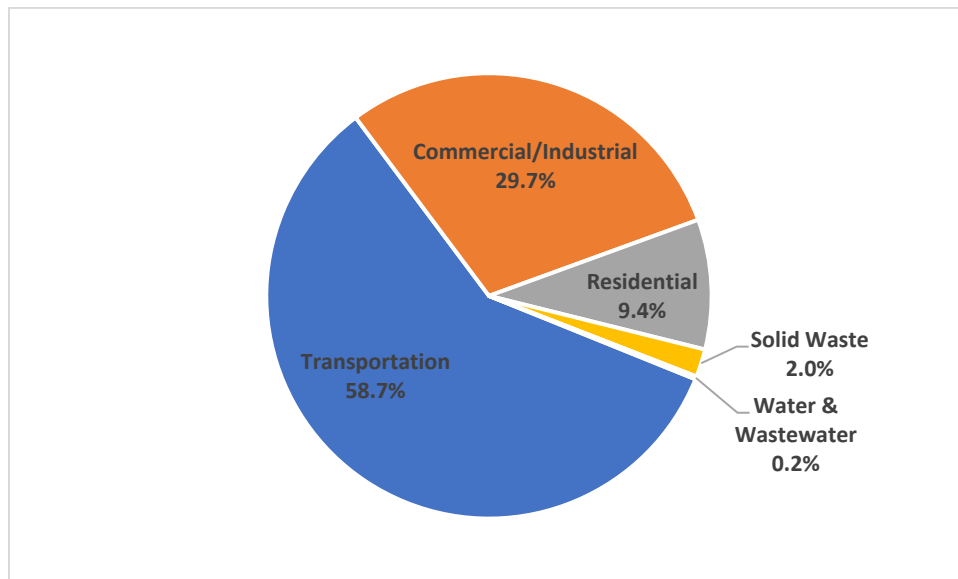
The most common GHGs are carbon dioxide (CO<sub>2</sub>) and water vapor, but the gases that are widely seen as the principal contributors to human-induced global climate change are carbon dioxide, nitrous oxide (N<sub>2</sub>O), methane (CH<sub>4</sub>), chlorofluorocarbons (CFC), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). GHGs are released into the earth's atmosphere through a variety of human activities, including transportation, industrial manufacturing, fossil fuel combustion, agricultural operations, livestock, and landfill operations.

Existing emissions of carbon dioxide equivalent (CO<sub>2</sub>e) in National City were estimated as part of the CAP for a base year of 2018. These emissions estimates were based on energy use data provided by local utilities and travel demand modeling data. As summarized in Table 4.9-1, the transportation sector was the greatest contributor to the community's emissions of CO<sub>2</sub>e, followed by energy use from the commercial/industrial sector. Figure 4.9-1 presents the relative contribution of emissions from each sector.

**Table 4.9-1 Community-Wide Emissions Inventory (2018)**

Sector	MTCO <sub>2</sub> e	Percentage
Transportation	304,070	58.7%
Commercial/Industrial	153,738	29.7%
Residential	48,872	9.4%
Solid Waste	10,493	2.0%
Water and Wastewater	1,092	0.2%
<b>Total</b>	<b>518,265</b>	<b>100%</b>

MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent

**Figure 4.9-1 National City GHG Inventory by Sector (2018 data)**

## 4.9.2 Regulatory Framework

### 4.9.2.1 Federal

#### Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards determine the fuel efficiency of certain vehicle classes in the United States. While the standards had not changed since 1990, as part of the Energy and Security Act of 2007, the CAFE standards were increased in 2007 for new light-duty vehicles to 35 miles per gallon (mpg) by 2020. In May 2009, plans were announced to further increase CAFE standards to require light-duty vehicles to meet an average fuel economy of 35.5 mpg by 2016. In August 2012, fuel economy standards were further increased to 54.5 mpg for cars and light-duty trucks by Model Year 2025. This will nearly double the fuel efficiency of those vehicles compared to current new vehicles. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

### 4.9.2.2 State

The State of California has adopted a number of plans and regulations aimed at identifying statewide and regional GHG emissions caps, GHG emissions reduction targets, and actions and timelines to achieve the target GHG reductions.

#### **Executive Order (EO) S-3-05 (2005)**

EO S-3-05 established State GHG emissions targets of 1990 levels by 2020 (the same as Assembly Bill [AB] 32, enacted later) and 80 percent below 1990 levels by 2050. It called for the Secretary of the California Environmental Protection Agency (Cal/EPA) to be responsible for the coordination of State agencies and progress reporting. In response to EO S-3-05, the Secretary of Cal/EPA created the Climate Action Team. This team originated as a coordinating council organized by the Secretary of Cal/EPA.

#### **Assembly Bill (AB) 32, California Global Warming Solutions Act**

In response to EO S-3-05, the California Legislature passed AB 32, the California Global Warming Solutions Act of 2006, and thereby enacted Sections 38500–38599 of the California Health and Safety Code. The heart of AB 32 is its requirement that the California Air Resources Board (CARB) establish an emissions cap and adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. AB 32 also required CARB to adopt a plan by January 1, 2009, indicating how emission reductions would be achieved from significant GHG sources via regulations, market mechanisms, and other actions.

#### **Senate Bill (SB) 32**

Approved in September 2016, SB 32 updates the California Global Warming Solutions Act of 2006 and enacts EO B-30-15. Under SB 32, the State would reduce its GHG emissions to 40 percent below 1990 levels by 2030. In implementing the 40 percent reduction goal, CARB is required to prioritize emissions reductions to consider the social costs of the emissions of GHGs, where “social costs” is defined as “an estimate of the economic damages, including, but not limited to, changes in net agricultural productivity; impacts to public health; climate adaptation impacts, such as property damages from increased flood risk; and changes in energy system costs, per metric ton of greenhouse gas emission per year”<sup>1</sup>

#### **SB 375**

SB 375, the 2008 Sustainable Communities and Climate Protection Act, was signed into law in September 2008 and gives CARB authority over sources of GHG emissions, including cars and light trucks. SB 375 sets up a collaborative process between metropolitan planning organizations (MPOs) and CARB to establish GHG emissions targets for each region in the State. SB 375 requires each MPO to include a “Sustainable Communities Strategy (SCS)” in its Regional Transportation Plan (RTP) that demonstrates how the region will meet the GHG emissions targets. The SCS is a growth strategy for each region that, in combination with transportation policies and programs, strives to reduce GHG emissions and meet CARB’s target for the region. The SCS documents are intended to:

- Identify the general location of uses, residential densities, and building intensities within the region;
- Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the RTP;
- Identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region;
- Identify a transportation network to service the transportation needs of the region;
- Gather and consider the best practically available scientific information regarding resource areas and farmland in the region;

---

<sup>1</sup> California Senate Bill No. 32, [http://www.leginfo.ca.gov/pub/15-16/bill/asm/ab\\_0151-0200/ab\\_197\\_bill\\_20160908\\_chaptered.html](http://www.leginfo.ca.gov/pub/15-16/bill/asm/ab_0151-0200/ab_197_bill_20160908_chaptered.html)

- Set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce GHG emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the GHG emissions reductions target approved by the State board; and
- Quantify the reduction in GHG emissions projected to be achieved by the SCS and, if the SCS does not achieve the targeted reductions in GHG emissions, set forth the difference between the amount that the SCS would reduce GHG emissions and the target for the region.

**SB 743 (Steinberg, 2013)**

With the passage of SB 743 in 2013, the State of California changed the method of measuring transportation impacts to vehicle miles traveled (VMT). Starting on July 1, 2020, automobile delay and level of service may no longer be used as the performance measure to determine the transportation impacts of land development projects under CEQA. VMT, the new required metric, shifts the focus of the analysis of transportation impacts away from automobile delay to the levels of automobile use. Utilizing VMT as a metric creates a closer alignment with statewide policies to reduce GHG emissions and encourages the development of smart growth, complete streets, and multimodal transportation networks.

**Cap-and-Trade Program**

The Cap-and-Trade Program includes GHG emissions from transportation, electricity, industrial, agricultural, waste, residential and commercial sources, and caps them while complementing the other measures needed to meet the 2030 GHG target. Altogether, the emissions covered by the Cap-and-Trade Program total 80 percent of all GHG emissions in California.

**Renewables Portfolio Standard (RPS)**

The RPS promotes diversification of the State's electricity supply and decreased reliance on fossil fuel energy sources. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial RPS"), the goal has been accelerated and increased by EOs S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California's 33 percent RPS goal. In September 2015, the California Legislature passed SB 350, which increases California's renewable energy mix goal to 50 percent by year 2030. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.

**California Green Building Standards Code (CALGreen)**

The California Building Standards Commission adopted the statewide mandatory CALGreen Part 11 of Title 24, California Code of Regulations, requiring energy-saving measures to be applied to planning, design, operation, construction, use, and occupancy of newly constructed buildings or structures.

**EO S-1-07**

EO S-01-07 established a Low-Carbon Fuel Standard and directed the Secretary of Cal/EPA to develop and propose protocols for measuring the life-cycle carbon intensity of transportation fuels.

**EO B-30-15 Reduction target of 40 percent below 1990 levels by 2030 (2015)**

Governor Edmund G. Brown Jr. issued an executive order (EO B-30-15) to establish a statewide GHG emissions reduction target of 40 percent below 1990 levels by 2030 and for CARB to update the Climate Change Scoping Plan to address the 2030 target. The executive order also calls for State agencies to update the State's climate adaptation strategy and consider climate change in their planning and investment decisions. This executive order updates the target year as set by AB 32, the California Global Warming Solutions Act (2006), which required California to reduce its GHG emissions to 1990 levels by 2020 and CARB to develop and implement a scoping plan that lays out California's strategy for meeting the goals. The scoping plan must be updated every five years, and CARB must maintain and continue reductions in emissions of GHG beyond 2020.

**SB 100 (De León) The 100 Percent Clean Energy Act of 2018**

California Governor Jerry Brown signed SB 100 (De León), The 100 Percent Clean Energy Act of 2018, which sets a State policy that eligible renewable energy and zero-carbon resources supply 100 percent of all retail sales of electricity in California by 2045. The bill also accelerates California's RPS, which, pursuant to a 2016 bill by the same author (SB 350), already mandates that load-serving entities procure at least 50 percent of retail sales from eligible renewable energy resources by 2030; under SB 100, the 2030 target will be increased to 60 percent, and the 50 percent target will be advanced to 2026, in recognition that California retail sellers are well on their way to achieving the target in advance of the existing deadlines. The SB 350 target-range adopted by CARB requires the electricity sector to achieve a reduction of 51 to 72 percent below 1990 levels by 2030, even as significant electrification of other end uses of energy is anticipated to meet the economy-wide goal, resulting in increased demand for electricity.

**EO B-55-18 To Achieve Carbon Neutrality by 2045 (2018)**

California Governor Jerry Brown issued EO B-55-18 To Achieve Carbon Neutrality by 2045, establishing a new statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter."<sup>2</sup> This goal is in addition to the existing statewide targets of reducing GHG emissions.

**2022 CARB Scoping Plan**

CARB's 2022 proposed scoping plan lays out the most recently recommended suite of policies needed to help the State achieve its GHG reduction targets. The proposed scenario builds on existing programs for the deployment of clean fuels and technologies, and for the first time brings California's forests, wetlands, and agricultural lands into the process, with the potential to leverage sustainable management to use these landscapes for carbon storage. This update aims to more effectively integrate equity and environmental justice throughout the State and to ensure that vulnerable communities are not disproportionately impacted by climate change. Appendix D of the Scoping Plan specifically addresses local government actions needed to support the State's climate goals, including a discussion of the role of land use plans and development projects in supporting the State's GHG goals.

**Advanced Clean Cars II (2022)**

The proposed regulation requires 100 percent of new cars and light trucks sold in California to be zero-emission vehicles, defined as zero tailpipe emission vehicles and plug-in hybrid electric vehicles. The regulation will also amend the Low-emission Vehicle Regulations to include increasingly stringent standards for gasoline-powered cars and heavier passenger trucks to continue to reduce smog-forming emissions.

**4.9.2.3 Regional****San Diego Association of Governments (SANDAG) 2050 RTP and SCS**

SANDAG, the MPO for the region, must prepare an SCS to show how the region will meet its goals of reducing GHG emissions from automobiles and light trucks.

The 2050 RTP and its SCS show that the San Diego region will meet or exceed these targets by using land in ways that make developments more compact, conserving open space, and investing in a transportation network that gives residents alternatives to driving individually.

SANDAG prepared a Regional Climate Action Planning Framework in 2020 to support, but not replace, cities' GHG emissions monitoring and/or CAP implementation over time. A snapshot of National City's activity data is available as part of the Climate Action Data Portal.<sup>3</sup> This data was prepared at the

---

<sup>2</sup> Executive Department, State of California, EO B-55-18 To Achieve Carbon Neutrality, <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>

<sup>3</sup> SANDAG, ReCAP City of National City Snapshot, November 2019, <https://www.nationalcityca.gov/home/showpublisheddocument/23168/637120864511370000>

county level and does not align precisely with GHG reduction measures or the metrics identified within the jurisdiction's adopted CAP.

#### 4.9.2.4 Local

##### National City CAP 2011

National City adopted a CAP in 2011, which addresses the major sources of GHG emissions in the City and sets forth a detailed and long-term strategy that the City and community can implement to achieve its GHG emissions reduction target. Implementation of this CAP guides National City's actions to reduce its contribution to global climate change and supports the State of California's ambitious emissions reduction targets. The CAP targets reduction of emissions by 15 percent below 2005/2006 baseline emission levels by 2020, with additional reductions by the year 2030. National City has divided its proposed measures and policies into community-wide and government operation sectors.

### 4.9.3 Significance Determination Thresholds

The 2022 CEQA Guidelines Issue VIII Greenhouse Gas Emissions includes the following significance thresholds:

- a) *Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*
- b) *Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

### 4.9.4 Issue Area 1: Greenhouse Gas Emissions

Compared to the existing land uses, the FGPU would increase residential, commercial, and mixed-use development capacity in proximity to transit locations in six Focus Areas throughout the Planning Area. Zoning overlays would allow for higher-intensity commercial uses and residential uses in a mixed-use setting with a pedestrian orientation. The FGPU would include key improvements to the Planning Area's circulation network to increase pedestrian and bicyclist safety and accessibility. The development of 10-minute neighborhoods and increased accessibility to public transit options and connectivity allows for more trips to be made without car and would reduce VMT per capita, and therefore, GHG emissions.<sup>4</sup>

Table 4.9-2 summarizes estimated CO<sub>2</sub>e emissions for both buildout of the Adopted Plan (which generally correlates to the Legislative Business-As-Usual scenario in the CAP) and the FGPU buildout, including additional development capacity and implementation of CAP actions. As part of the CAP process (refer to Appendix 13.B.6), an inventory of community-wide CO<sub>2</sub>e emissions was first developed for 2018. The Adopted Plan forecast represents emissions that would occur in 2050 under all currently adopted legislation, including the adopted General Plan. These emissions were estimated by applying a growth factor to 2018 data, but also considering legislative actions that will reduce emissions of carbon dioxide by 2050, including electric vehicle mandates and the RPS. The 2050 FGPU forecast incorporates vehicle emissions from travel demand modeling developed for the proposed FGPU buildout and additional reductions from the implementation of strategies outlined in the CAP. Specific assumptions for the emissions are described in the CAP Emissions Methodology, Attachment 1 of Appendix 13.B.6.

---

<sup>4</sup> VMT per capita, calculated for purposes of SB743 compliance would be reduced from buildout of the Adopted Plan in 2050, as reflected in the Traffic Impact Analysis (TIA) memo (Appendix 13.C.1). One VMT represents a single vehicle traveling one mile.

VMT is summarized using different methods for State laws and climate analysis. Senate Bill (SB) 743 focuses on travel made by residents of National City. SB 743 Resident VMT summarizes vehicle travel made by National City residents, regardless of what geographic area the trip takes place in, for all the different purposes a person travels such as going to work or grocery shopping. Total resident VMT for the FGPU is 687,288.

VMT, as used in the Climate Action Plan (CAP), focuses on VMT directly influenced by National City land use and summarizes trips coming to, going from, or staying within the National City boundaries regardless of where a person lives, works, or why they are traveling. CAP VMT is calculated as 100 percent of all vehicle trips starting and ending in National City, 50 percent of vehicle trip VMT that either starts or ends in National City, and 0 percent of vehicle trip VMT that travels through National City but does not stop within City boundaries. CAP VMT is, therefore, not reflected on a "per resident" basis. CAP VMT increases in 2050 with adoption of the FGPU as compared to the Adopted General Plan, consistent with increased residential and commercial capacity.

**Table 4.9-2 Annual Emissions Forecasts**

Emission Source	Annual Emissions (MTCO <sub>2</sub> e/year)				
	Existing (2018)	Adopted Plan Forecast (2050)	FGPU Forecast (2050)	Difference (FGPU Adopted)	Difference (FGPU Existing)
Transportation	304,070	10,751	11,242	491	-292,828
Commercial/Industrial	153,738	163,056	56,594	-106,462	-97,144
Residential	48,872	49,972	17,344	-32,628	-31,528
Solid Waste	10,493	14,284	14,367	83	3,874
Water and Wastewater	1,092	1,487	1,487	0	395
<b>Total</b>	<b>518,265</b>	<b>239,550</b>	<b>101,034</b>	<b>-138,516</b>	<b>-417,231</b>
<b>Residents</b>		81,532	83,729	2,197	
<b>Total per Resident</b>		2.9	1.2	-1.7	

Source: Emissions modeling from Climate Action Plan, Appendix 13.B.6  
MTCO<sub>2</sub>e = metric tons of carbon dioxide equivalent

As shown in Table 4.9-2, total GHG emissions would decrease for proposed land uses identified within the FGPU when compared to buildout of the adopted General Plan land uses. Emissions from the transportation and solid waste sectors were found to increase over the adopted General Plan. Emissions from the commercial, industrial, and residential sectors were found to decrease as compared to the adopted General Plan forecast, despite the growth in these land use types, due to CAP strategies designed to promote efficient energy usage within those sectors.

While the FGPU would authorize additional residential and mixed-use development potential within Focus Areas compared to what would be allowed under the adopted General Plan and zoning, this increase in development intensity would be focused around the existing and future trolley and transit stations. Although the GHG emissions attributable to the transportation sector are projected to increase, this increase is minimized by the implementation of elements outlined in the FGPU. This is achieved by the FGPU's focus on designating high-density mixed-use development within a 0.5-mile radius of high-quality transit within defined Focus Areas.

The designation of these areas for high-density residential within mixed-use development would take advantage of the proximity to the existing Trolley Stations and local bus routes and the future Mobility Hubs. The 4th Street and Hospital Area Focus Areas lie on the 8th Street Transit Center – Plaza Bonita Line and intersect the 24th Street Trolley – Munda/Ridgewood and Kaiser Hospital/Grantville – 24th Street Trolley lines. The D Avenue, 16th Street, and 18th Street Focus Areas are in near the 24th Street Trolley – Munda/Ridgewood, 8th Street Transit Center – Plaza Bonita, Kaiser Hospital/Grantville – 24th Street Trolley, and 24th Street Trolley – Encanto/62nd Street Trolley lines.<sup>5</sup>

By targeting new growth along transit corridors and within, or within a 0.5-mile radius of, transit stops, the FGPU buildout would be consistent with the General Plan's goals and objectives, including increasing mobility, preserving and enhancing neighborhood character, improving air quality, reducing stormwater runoff, reducing paved surfaces, and fostering compact development and a more walkable city. Transit connections to key destinations are also important factors of a complete "10 minute" neighborhood. Improving public transit options, access, and connectivity allows for more trips

<sup>5</sup> National City, General Plan, Transportation Element, 2022, Figure T-5: Regional Public Transit System

to be made without a car and supports the City's climate action goals to reduce GHG emissions and VMT.

Furthermore, the FGPU includes an update to the City's 2011 CAP. The CAP includes strategies that aim to reduce emissions from all sectors (energy, transportation, water, solid waste, etc.). The CAP update aligns the City's emissions reduction targets with those of the State: 60 percent reduction by 2030 and 80 percent reduction by 2050. The FGPU forecast, shown in Table 4.9-2, is consistent with the CAP mitigated forecast that includes buildout of the collective actions of the FGPU, including increased residential, commercial, and mixed-use development intensity and transportation network updates. Emissions from VMT under the FGPU are inclusive of these actions, along with other transit-related improvements incentivized by CAP strategies. The mitigated forecast also accounts for implementation of various policies and programs that the City will seek to undertake during CAP implementation, including participation in San Diego Community Choice Power, a Community Choice Energy program, and adoption of building efficiency standards targeted at reducing emissions from natural gas. With implementation of FGPU land use and network updates, along with implementation of CAP strategies, the City would meet State reduction targets for both 2030 and 2050.

In meeting State targets for both 2030 and 2050, the CAP in conjunction with this SPEIR serve as a Qualified GHG Reduction Plan under CEQA Guidelines Section 15183.5. This section of the CEQA Guidelines permits discretionary projects under CEQA that are consistent with the CAP, to be able to tier off the GHG analysis set forth in the FGPU Final SPEIR. Consistency with the City's CAP can be used to evaluate the significance of the future discretionary projects' GHG impacts. The consistency analysis would evaluate the proposed project with the CAP through a comparison of the land use and transportation assumptions for which the CAP was developed, and secondarily through a qualitative analysis of CAP strategies and their implementation at the project level.

The FGPU would decrease GHG emissions as compared to those that would occur under buildout of the adopted General Plan; thus, impacts associated with GHG emissions would be *less than significant*.

### **4.9.5 Issue Area 2: Plan Consistency**

The regulatory plans and policies discussed in Section 4.9.2, above, aim to reduce national, State, and local GHG emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. Plan goals and regulatory standards are thus largely focused on the automobile industry and public utilities.

#### **Consistency with State Plans**

EO S-3-05 establishes GHG emission reduction targets for the State, and AB 32 launched the Climate Change Scoping Plan, which outlines the reduction measures needed to reach these targets. As discussed above, the CAP has set local targets for the City aligned with State targets codified by AB 32 and SB 32. The CAP update contains a suite of GHG emissions reduction strategies that would allow the City to meet State-aligned targets.

In 2022, CARB adopted an updated scoping plan that provides a path to net zero carbon emissions for the State by 2045. Appendix D of the Final Scoping Plan includes recommendations intended to build momentum for local government actions that align with the State's climate goals, with a focus on local GHG reduction strategies and approval of new land use development projects. The recommendations include a list (Scoping Plan Table 1) of impactful GHG reduction strategies that can be implemented by local governments in three priority areas: transportation electrification, VMT reduction, and building decarbonization. The CAP developed as part of the FGPU incorporates measures that align with all three priority areas to support transportation electrification, reduce VMT through density and transit planning, and implement building electrification requirements. The FGPU would be consistent with, and aim to implement, principles of the 2022 Scoping Plan. Therefore, impacts in terms of consistency or conflict with State plans would be *less than significant*.



**Consistency with Regional Plans**

The proposed FGPU would be consistent with the goals of SANDAG's RTP/SCS to develop compact, walkable communities close to transit connections and consistent with smart growth principles. The proposed FGPU supports the multimodal strategy of SANDAG's Regional Plan through improvements to increase bicycle, pedestrian, and transit access. Policies contained within the proposed Transportation Element would serve to promote bus transit use, as well as other forms of mobility, including walking and bicycling. While the FGPU would result in an increase in VMT, the VMT per capita would be reduced from 8.33 miles per resident to 8.21 miles per resident. Development called for in the FGPU is consistent with the goals of the Regional Plan for reducing the emissions associated with new development. Furthermore, access to transit also results in most increased development capacity through the FGPU being located within a designated Transit Priority Area, consistent with SB 743. The adoption of the proposed FGPU would result in *less than significant* impacts in terms of consistency or conflict with the Regional Plan.

**4.9.6 Mitigation, Monitoring, and Reporting**

No mitigation is necessary.