

GREENHOUSE GAS EMISSIONS

SUMMARY

The proposed project would generate greenhouse gas emissions but would not exceed the thresholds of significance recommended by the VCAPCD.

The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

ENVIRONMENTAL SETTING

Greenhouse Gas Emissions Background

Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation and temperature. Although there is disagreement as to the speed of global warming and the extent of the impacts attributable to human activities, most agree that there is a direct link between increased emission of GHGs and long-term global temperature. What GHGs have in common is that they allow sunlight to enter the atmosphere, but trap a portion of the outward-bound infrared radiation and warm up the air. The process is similar to the effect a greenhouse has in raising the internal temperature, hence the name greenhouse gases. Both natural processes and human activities emit GHGs. The accumulation of greenhouse gases in the atmosphere regulates the earth's temperature; however, it is the scientific consensus that emissions from human activities such as electricity generation and motor vehicle operations have elevated the concentration of GHGs in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to global climate change.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H₂O). CO₂ is the reference gas for climate change because it is the predominant greenhouse gas emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO₂e equivalents (CO₂e).

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05 on June 1, 2005, which calls for a reduction in GHG emissions to 1990 levels by 2020 and for an 80 percent reduction in GHG emissions below 1990 levels by

2050 in California. The Secretary of the California Environmental Protection Agency (CalEPA) was charged with coordination of efforts to meet these targets and formed the Climate Action Team (CAT) to implement the Order.

In March 2006, the CAT published the Climate Action Team Report to Governor Schwarzenegger and the Legislature (the 2006 CAT Report). The 2006 CAT Report identifies a recommended list of strategies that the State could pursue to reduce climate change GHG emissions. These are strategies that could be implemented by various State agencies to ensure that the Governor's targets are met and can be met with existing authority of the State agencies.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the California Air Resources Board (ARB) to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020. As a central requirement of AB 32, the ARB was assigned the task of developing a Scoping Plan that outlines the State's strategy to achieve the 2020 GHG emissions limit. This Scoping Plan, which was developed by the ARB in coordination with the CAT, was published in October 2008. The Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the State's dependence on oil, diversify the State's energy sources, save energy, create new jobs, and enhance public health. An important component of the plan is a cap-and-trade program covering 85 percent of the State's emissions. Additional key recommendations of the Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards; increases in the amount of clean and renewable energy used to power the State; and implementation of a low-carbon fuel standard that will make the fuels used in the State cleaner. Furthermore, the Scoping Plan also proposed full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. The Scoping Plan was approved by the ARB on December 11, 2008. According to The 2017 Climate Change Scoping Plan Update, California has made progress toward achieving the 2020 statewide target while also reducing criteria pollutants and toxic air contaminants, and supporting economic growth.¹

In April 2015, Governor Brown signed Executive Order B-30-15 which establishes a new interim target to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. This interim target is established to ensure that the state meets its target of reducing GHG emissions to 80 percent below 1990 levels by 2050. Five key goals for reducing GHG emissions through 2030 include: increasing renewable electricity to 50 percent; 2) doubling the energy efficiency savings achieved in existing buildings and making heating fuels cleaner; 3) reducing petroleum use in cars and trucks by up to 50 percent; 4) reducing emissions of short-lived climate pollutants; and 5) managing farms, rangelands, forests and

¹ California Air Resources Board, 2017.

wetlands to increasingly store carbon. Executive Order B-30-15 also called on the ARB to update the AB 32 Climate Change Scoping Plan to incorporate the 2030 target. The new interim standard was adopted under Senate Bill 32 (SB) 32 and the ARB requirements were adopted under AB 197 in the Summer of 2016.

Regulatory Setting

California Emissions Reductions Policies and Targets

In June 2005, Governor Schwarzenegger issued Executive Order S-3-05, establishing GHG emissions reduction targets for the State of California. In 2006, the State adopted the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32). AB 32 declared that global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California, and established a State goal of reducing GHG emissions to 1990 levels by the year 2020.

Executive Order B-30-15 was enacted by Governor Brown on April 29, 2015. This Executive Order establishes an interim GHG emission reduction goal for the State to reduce GHG emissions to 40 percent below 1990 levels by 2030. This Executive Order also directs all State agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 goal, as well as the pre-existing, long-term 2050 goal identified in Executive Order S-3-05 to reduce GHG emissions to 80 percent below 1990 levels by the year 2050.

SB 32 authorizes the California Air Resources Board (CARB) to adopt an interim GHG emissions level target to be achieved by 2030 and to adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions. The California Legislature also passed companion legislation AB 197, which provided additional direction for developing an updated Scoping Plan. CARB released the second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32 in November 2017.

Additionally, signed into law in September 2018, SB 100 increased California's renewable electricity portfolio from 50 to 60 percent by 2030. SB 100 also established a further goal to have an electric grid that is entirely powered by clean energy by 2045.

California Regulations

Although not originally intended to specifically reduce GHG emissions, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings that require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2019 Title 24 standards (effective as of January 1, 2020) were adopted to respond, amongst other

reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2020 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards (CALGreen) Code (California Code of Regulations, Title 24, Part 11). The indoor and outdoor water use standards of the CALGreen Code are already addressed by the Camrosa Water District's Water Conservation Ordinance. Key provisions of the CALGreen Code that apply to the type of new residential and non-residential developments proposed for the project site are as follows:

Residential Uses

- Division 4.1 - Planning and Design
 - Section 4.106 - Site Development
 - 4.106.4 Electric vehicle (EV) charging for new construction. New construction shall comply with Section 4.106.4.1, 4.106.4.2, or 4.106.4.3, to facilitate future installation and use of EV chargers. Electric vehicle supply equipment (EVSE) shall be installed in accordance with the California Electrical Code, Article 625.
 - 4.106.4.1 New one- and two-family dwellings and townhouses with attached garages. For each dwelling unit, install a listed raceway to accommodate a dedicated 208/240-volt branch circuit. The raceway shall not be less than trade size 1 (nominal 1-inch inside diameter). The raceway shall originate at the main service or sub panel and shall terminate into a listed cabinet, box or other enclosure in close proximity to the proposed location of an EV charger. Raceways are required to be continuous at enclosed, inaccessible or concealed areas and spaces. The service panel and/or sub panel shall provide capacity to install a 40-ampere minimum dedicated branch circuit and space(s) reserved to permit installation of a branch circuit overcurrent protective device.
- Division 4.4 - Material Conservation and Resource Efficiency
 - Section 4.408 - Construction Waste Reduction, Disposal and Recycling
 - 4.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 4.408.2, 4.408.3 or 4.408.4, or meet a more stringent local construction and demolition waste management ordinance.
 - 4.408.2 Construction waste management plan. Submit a construction waste management plan in conformance with Items 1 through 5. The construction waste management plan shall be

updated as necessary and shall be available during construction for examination by the enforcing agency.

1. Identify the construction and demolition waste materials to be diverted from disposal by recycling, reuse on the project or salvage for future use or sale.
 2. Specify if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
 3. Identify diversion facilities where the construction and demolition waste material will be taken.
 4. Identify construction methods employed to reduce the amount of construction and demolition waste generated.
 5. Specify that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, or both.
- 4.408.3 Waste management company. Utilize a waste management company, approved by the enforcing agency, which can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with Section 4.408.1.
 - 4.408.4 Waste stream reduction alternative. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills which do not exceed 3.4 pounds per square foot of the building area, shall meet the minimum 65 percent construction waste reduction requirement in Section 4.408.1.
 - 4.408.4.1 Waste stream reduction alternative. Projects that generate a total combined weight of construction and demolition waste disposed of in landfills which do not exceed 2 pounds per square foot of the building area, shall meet the minimum 65 percent construction waste reduction requirement in Section 4.408.1.
 - Section 4.410 - Building Maintenance and Operation
 - 4.410.1 Operation and maintenance manual. At the time of final inspection, a manual, compact disc, web-based reference or other media acceptable to the enforcing agency which includes all of the following shall be placed in the building:
 1. Directions to the owner or occupant that the manual shall remain with the building throughout the lifecycle of the structure.
 2. Operation and maintenance instructions for the following:

- a. Equipment and appliances, including water saving devices and systems, HVAC systems, photovoltaic systems, electric vehicle chargers, water-heating systems and other major appliances and equipment.
 - c. Space conditioning systems, including condensers and air filters.
3. Information from local utility, water and waste recovery providers on methods to reduce resource consumption, including recycle programs and locations.
 4. Public transportation and/or carpool options available in the area.
 9. Information about state solar energy and incentive programs available.
 10. A copy of all special inspection verifications required by the enforcing agency or this code.

Nonresidential Uses

- Division 5.1 - Planning and Design
 - Section 5.106 - Site Development
 - 5.106.12 Shade Trees. Shade trees shall be planted to comply with Sections 5.106.12.1, 5.106.12.2, and 5.106.12.3. Percentages shown shall be measured at noon on the summer solstice. Landscape irrigation necessary to establish and maintain tree health shall comply with Section 5.304.6.
 - 5.106.12.1 Surface parking areas. Shade tree plantings, minimum #10 container size or equal shall be installed to provide shade over 50 percent of the parking area within 15 years.
- Division 5.4 - Material Conservation and Resource Efficiency
 - Section 5.408 - Construction Waste Reduction, Disposal and Recycling
 - 5.408.1 Construction waste management. Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with either Section 5.408.1.1, 5.408.1.2 or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
 - 5.408.1.1 Construction waste management plan. Where a local jurisdiction does not have a construction and demolition waste management ordinance that is more stringent, submit a construction waste management plan that:
 1. Identifies the construction and demolition waste materials to be diverted from disposal by efficient useage, recycling, reuse on the project or salvage for future use or sale.

2. Determines if construction and demolition waste materials will be sorted on-site (source-separated) or bulk mixed (single stream).
 3. Identifies diversion facilities where the construction and demolition waste material will be taken.
 4. Specifies that the amount of construction and demolition waste materials diverted shall be calculated by weight or volume, but not by both.
- 5.408.1.2 Waste management company. Utilize a waste management company that can provide verifiable documentation that the percentage of construction and demolition waste material diverted from the landfill complies with this section.
 - 5.408.1.3 Waste stream reduction alternative. The combined weight of new construction disposal that does not exceed two pounds per square foot of the building area shall meet the minimum 65 percent minimum requirement as approved by the enforcing agency.
 - 5.408.3 Excavated soil and land clearing debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled.
 - Section 5.410 - Building Maintenance and Operation
 - 5.410.1 Recycling by occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals or meet a lawfully enacted local recycling ordinance, if more restrictive.

Statewide GHG Emissions

According to The 2017 Climate Change Scoping Plan Update, the major source of GHGs in California is transportation, contributing approximately 37 percent of the state's total GHG emissions.² Industrial sources are the second largest generator, contributing approximately 24 percent of the state's GHG emissions. Residential and commercial sources contribute only about six and five percent of the State's GHG emissions, respectively. These are less than the eight percent generated by agriculture.

Existing Project Site Emissions

Camarillo Springs Golf Course is a 182-acre, privately-owned facility that has been developed and operational for more than 45 years. The property is currently developed with an 18-hole golf course, clubhouse facility, driving range, maintenance buildings, and associated structures.

² California Air Resources Board, 2017.

The annual GHG emissions associated with the existing golf course have been estimated utilizing the California Emissions Estimator Model (CalEEMod v. 2016.3.2) and the trip generation data from the project Traffic and Circulation Study as recommended by the Ventura County Air Pollution Control District (VCAPCD). The estimated average daily emissions associated with the golf course are presented in Table 5.7-1.

TABLE 5.7-1 - ESTIMATED EXISTING ANNUAL GHG EMISSIONS

Emissions Source	CO ₂ e in Metric Tons per Year
Area Sources	<0.1
Energy Sources	0.0
Mobile Sources	398.0
Waste Disposal	1.2
Water and Wastewater	531.9
Total Emissions	931.1

CalEEMod result sheets are provided in Appendix M.

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G to the State CEQA Guidelines, a project could have a potentially significant impact on GHG emissions if it would:

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

There are several unique challenges to analyzing greenhouse gas emissions and climate change under CEQA, largely because of climate change’s “global” nature. Typical CEQA analyses address project actions that have local – or, at most, regional – impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the “project-specific” impacts that a particular project is likely to generate. With regard to global warming, however, it is generally accepted that while the magnitude of global warming effects may be substantial, the GHG emissions from a single general development project would have no noticeable effect on global climate.

Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which the impacts are all measured within, and are linked to, a discrete region or area. Instead, a climate change analysis must be considered on a global level, rather than the typical local or regional setting, and requires consideration of not only emissions from the project under consideration, but also the extent of the displacement, translocation, and redistribution of emissions. In the usual context, where air quality is linked to a particular location or area, it is appropriate to consider the creation of new emissions in that specific area to be an environmental impact whether or not the emissions are truly “new” emissions to the overall globe. When the impact is a global one, however, it makes more sense to consider whether the emissions really are new emissions, or are merely being moved from one place to another. For example, the approval of a new developmental plan or project does not necessarily create new automobile drivers - the primary source of a land use project’s emissions. Rather, due to the “relocation” factor, new land use projects sometimes merely redistribute existing mobile emissions;³ accordingly, the use of models that measure overall emissions increases without accounting for existing emissions will substantially overstate the impact of the development project on global warming. This makes an accurate analysis of GHG emissions substantially different from other air quality impacts, where the “addition” of redistributed emissions to a new locale can make a substantial difference to overall air quality.

For greenhouse gas emissions and global climate change, there is not, at this time, one established, universally agreed-upon “threshold of significance” by which to measure an impact. While the ARB published some draft thresholds several years ago, they were never adopted and the ARB recommended that local air districts and lead agencies adopt their own thresholds for GHG impacts.

As discussed in the Air Quality section of this EIR, the City of Camarillo relies upon the expert guidance of the VCAPCD regarding the methodology and thresholds of significance for the evaluation of air quality impacts within Ventura County. GHG emissions are air pollutants that are subject to local control by the VCAPCD. As such, the City looks to the VCAPCD for guidance in the evaluation of GHG impacts.

In September 2011, the Ventura County Air Pollution Control Board requested that VCAPCD staff report back on possible GHG significance thresholds for evaluating GHG impacts of land use projects in Ventura County under CEQA. VCAPCD staff responded to this request by preparing a report entitled Greenhouse Gas Thresholds of Significance Options for Land Use Development Projects in Ventura County. This

³ For example, a subdivision of 500 homes generates 5,000 new trips per day and those trips would be added to the local streets and intersections. In the case of climate change, the trips that are associated with those same 500 homes presumably would emit roughly the same volume of GHGs in the City of Camarillo as they would if they were traveling the same number of miles in Cleveland, Ohio. As a result, while raw vehicle trip counts occurring within a project area will accurately predict changes in congestion at intersections, the same certainty cannot be provided for climate change. The trips would certainly increase the number of vehicles passing through local intersections, but they will not increase the amount of GHG emissions into the world’s atmosphere if those trips simply have been relocated from another location on the planet.

report presents a number of options for GHG significance thresholds and summarizes the most prominent approaches and options either adopted or being considered by all other air districts throughout California. Similar to other air districts, VCAPCD staff members are considering a tiered approach with the main components involving consistency with a locally adopted GHG reduction plan followed by a bright-line threshold for land use projects that would capture 90 percent of project GHG emissions. VCAPCD staff members are also exploring an efficiency-based metric (e.g., GHG emissions per capita) for land use projects and plans. The South Coast Air Quality Management District (SCAQMD) is also considering these strategies for land use projects.

Given that Ventura County is adjacent to the SCAQMD jurisdiction and is a part of the Southern California Association of Governments (SCAG) region, VCAPCD staff believes it makes sense to set local GHG emission thresholds of significance for land use development projects at levels consistent with those set by the SCAQMD and the SCAG region. VCAPCD staff believe that adopting harmonized regional GHG emission thresholds would help streamline project review and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout most of Southern California.

The SCAQMD has been evaluating GHG significance thresholds since April 2008. In December 2008, the SCAQMD adopted an interim 10,000 metric tons CO₂e (MTCO₂e) per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The SCAQMD has continued to consider adoption of significance thresholds for residential and general development projects. The most recent proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

- Tier 1** Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.
- Tier 2** Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.
- Tier 3** Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MTCO₂e/year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MTCO₂e/year), commercial projects (1,400 MTCO₂e/year), and mixed-use projects (3,000 MTCO₂e/year). Under option 2 a single numerical screening threshold of 3,000 MTCO₂e/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.
- Tier 4** Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions by 2020 and 2035. The 2020 efficiency targets are 4.8 MTCO₂e per service population for project level analyses

and 6.6 MTCO₂e per service population for plan level analyses. The 2035 targets that reduce emissions to 40 percent below 1990 levels are 3.0 MTCO₂e per service population for project level analyses and 4.1 MTCO₂e per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5 Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. The future schedule and likelihood of threshold adoption is uncertain.

However, for the purpose of evaluating the GHG impacts associated with this proposed project, this analysis utilizes the SCAQMD's draft tiered thresholds of significance. The SCAQMD's draft thresholds have also been utilized for other projects in Ventura County and the City of Camarillo.

PROJECT IMPACTS AND MITIGATION MEASURES

Generation of GHG Emissions

Threshold: Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact: The proposed project would generate greenhouse gas emissions but would not exceed the thresholds of significance recommended by the VCAPCD.

Impact Analysis

Tier 1

The proposed project is subject to CEQA, but no categorical exemptions are applicable to the project. Therefore, the analysis moves to Tier 2.

Tier 2

Neither the VCAPCD nor the City of Camarillo have adopted a GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. Therefore, the analysis moves to Tier 3.

Tier 3

The estimated annual operational GHG emissions associated with the proposed project (residential use and golf course operations) have been calculated utilizing CalEEMod and the trip generation data from

the project Traffic and Circulation Study recommended by the VCAPCD. These emissions are shown in Table 5.7-2. As shown, the net increase annual emissions would not exceed the draft 3,000 MTCO₂e threshold for mixed-use and non-industrial projects. Therefore, the City of Camarillo, as lead agency, concludes that the GHG emissions generated in association with the proposed project would not have a significant impact on the environment.

TABLE 5.7-2 - ESTIMATED PROJECT ANNUAL GHG EMISSIONS

Emissions Source	CO ₂ e in Metric Tons per Year
Construction	81.1
Area Sources	3.1
Energy Sources	457.9
Mobile Sources	1,357.3
Waste Disposal	19.3
Water and Wastewater	577.6
Total Project Emissions	2,496.3
Existing Project Site Emissions	931.1
Net Increase	1,565.2
SCAQMD Draft Tier 3 Threshold	3,000.0
Exceeds Threshold?	No

Construction emissions are amortized over 30 years in accordance with SCAQMD guidance (2,434.4 MTCO₂e/30 years).

The CalEEMod calculations assume the standard statewide engine tiers for the construction equipment operating at the site. The calculations do not assume the use of or requirement for newer engines that meet more stringent USEPA standards. This provides a more conservative analysis of potential construction-related GHG emissions.

The operational emissions shown in this table are the mitigated overall operational emissions totals shown in the CalEEMod results sheets, which assume building energy efficiency as required by Title 24 and the CalGreen Code.

CalEEMod result sheets are provided in Appendix M.

Consistency With GHG Plans

Threshold: Would the proposed project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact: The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Impact Analysis

As discussed previously, the 2006 CAT Report and the ARB's Scoping Plan were developed to direct the state to reduce GHG emissions to 1990 levels, and further updated in to reflect the 2030 reduction target set by Executive Order B-30-15. The strategies from the 2006 CAT Report and measures from the ARB's Scoping Plan are applicable to state, regional, and local agencies in the development of plans to reduce GHG emissions, but are not applicable to each and every new general development project. The general intent of these plans, however, is to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. Strategies and measures have been also been implemented on the state level by example of the new Title 24 CalGreen Code and on the local level by the Camrosa Water District's Water Conservation Ordinance.

Although not originally intended to specifically reduce air pollutant emissions, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings, was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2019 Title 24 standards (effective as of January 1, 2020) were adopted to respond, amongst other reasons, to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2020 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the CALGreen Code.

Based on this information, the proposed project would not conflict with an applicable plan, policy or regulation for the purpose of reducing the emissions of GHGs. The impact of the proposed project would be less than significant.

CUMULATIVE IMPACTS

As discussed above, emitting GHGs into the atmosphere is not itself an adverse environmental effect. Rather, it is the increased accumulation of GHGs in the atmosphere that may result in global climate change; the consequences of which may result in adverse environmental effects. The state has mandated a goal of reducing state-wide emissions to 1990 levels by 2020, even though state-wide population and commerce is expected to grow substantially. As discussed above, the proposed project does not exceed the draft thresholds of significance for mixed-use and non-industrial projects. Therefore, the contribution of the project to the cumulative effect of global climate change is not considered to be cumulatively considerable.

UNAVOIDABLE SIGNIFICANT IMPACTS

The proposed project would not create any unavoidable significant impacts associated with GHG emissions.