

## **IV. Environmental Impact Analysis**

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### **G. Greenhouse Gas Emissions**

#### **1. Introduction**

This section compares the Project's characteristics with applicable regulations, plans, and policies set forth by the State of California (State), the Southern California Association of Governments (SCAG), Los Angeles County Metropolitan Transportation Authority (Metro) and the City to reduce greenhouse gas (GHG) emissions to determine whether the Project is consistent with and/or would conflict with these regulations, plans and policies, which are identified in the Regulatory Framework section of this chapter. To assist in analyzing the Project's potential to conflict with applicable regulations, plans and policies, this section also estimates the Project's GHG emissions generated by Project construction and operations, taking into account mandatory and voluntary energy and resource conservation measures that have been incorporated into the Project to reduce GHG emissions. Details of the GHG analysis are provided in the *Transportation Communication Network (TCN) Greenhouse Gas Calculation Worksheets*, which are attached as Appendix C.3 of this Draft EIR, and are incorporated by reference.

#### **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 severe weather events. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit (°F). However, as GHGs from human activities increase, they build up in the atmosphere and warm the climate, leading to many other changes around the

world—in the atmosphere, on land, and in the oceans, with associated adverse climatic and ecological consequences.<sup>1</sup>

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity, and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the “enhanced greenhouse effect” to distinguish it from the natural greenhouse effect.<sup>2</sup>

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the United States Environmental Protection Agency (USEPA), global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 43 percent between 1990 and 2015. In addition, in the Global Carbon Budget 2021 report, published in April 2022, atmospheric carbon dioxide (CO<sub>2</sub>) concentrations in 2022 were found to be 49 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.<sup>3</sup> Global increases in CO<sub>2</sub> concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. Regarding emissions of non-CO<sub>2</sub> GHGs, these have also increased significantly since 1990.<sup>4</sup> In particular, studies have concluded that it is very likely that the observed increase in methane (CH<sub>4</sub>) concentration is predominantly due to agriculture and fossil fuel use.<sup>5</sup>

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change (UNFCCC) led to the official recognition by the participating nations that global emissions of GHG must be reduced. According to the “Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol,” avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions

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<sup>1</sup> *Pew Center on Global Climate Change, Climate Change 101: Understanding and Responding to Global Climate Change.*

<sup>2</sup> *P. Friedlingstein et al., Global Carbon Budget 2021, 2022.*

<sup>3</sup> *USEPA, Global Greenhouse Gas Emissions Data, www.epa.gov/ghgemissions/global-greenhouse-gas-emissions-data, accessed July 14, 2022.*

<sup>4</sup> *USEPA, Climate Change Indicators: Atmospheric Concentrations of Greenhouse Gas, updated April 2021.*

<sup>5</sup> *United Nations Framework Convention on Climate Change, Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change, August 31, 2007.*

reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol's Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.<sup>6</sup>

In December 2015, the U.S. entered into the Paris Agreement, which has a goal of keeping a global temperature rise this century below 2 degrees Celsius (°C) above pre-industrial levels and limiting the temperature increase further to 1.5°C. This agreement requires that all parties report regularly on emissions and implementation efforts to achieve these goals.

Regarding the adverse effects of global warming, as reported by SCAG:

*Global warming poses a serious threat to the economic well-being, public health and natural environment in Southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO<sub>2</sub> emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO<sub>2</sub> emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. The SCAG region, with close to half of the state's population and economic activities, is also a major contributor to the global warming problem.<sup>7</sup>*

## a. GHG Fundamentals

GHGs are those compounds in Earth's atmosphere that play a critical role in determining temperature near Earth's surface. GHGs include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>).<sup>8</sup> More specifically, these gases

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<sup>6</sup> SCAG, *The State of the Region—Measuring Regional Progress*, December 2006, p. 121.

<sup>7</sup> As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

<sup>8</sup> Intergovernmental Panel on Climate Change, *Second Assessment Report, Working Group I: The Science of Climate Change*, 1995.

allow high-frequency shortwave solar radiation to enter Earth's atmosphere but retain some of the low frequency infrared energy, which is radiated back from Earth towards space, resulting in a warming of the atmosphere. Compounds that are regulated as GHGs are discussed in Table IV.G-1 on page IV.G-5.<sup>9,10</sup>

Not all GHGs possess the same ability to induce climate change. CO<sub>2</sub> is the most abundant GHG in Earth's atmosphere. Other GHGs are less abundant but have higher global warming potential (GWP) than CO<sub>2</sub>. Thus, emissions of other GHGs are commonly quantified in the units of equivalent mass of carbon dioxide (CO<sub>2</sub>e). GWP is based on several factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO<sub>2</sub>, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years otherwise referred to as atmospheric lifetime) relative to that of CO<sub>2</sub>.

The larger the GWP, the more that a given gas warms Earth compared to CO<sub>2</sub> over that time.<sup>11</sup> These GWP ratios are available from the Intergovernmental Panel on Climate Change (IPCC). Historically, GHG emission inventories have been calculated using the GWPs from the IPCC's Second Assessment Report (SAR). The IPCC updated the GWP values in its Fourth Assessment Report (AR4). The GWPs in the IPCC AR4 are used by CARB for reporting Statewide GHG emissions inventories, consistent with international reporting standards. By applying the GWP ratios, Project-related CO<sub>2</sub>e emissions can be tabulated in metric tons per year. Typically, the GWP ratio corresponding to the warming potential of CO<sub>2</sub> over a 100-year period is used as a baseline.

The IPCC has issued an updated Fifth Assessment Report (AR5), which has revised down the majority of the GWP for key regulated pollutants. As CARB still uses AR4 values and the modeling software CalEEmod is built on these assumptions, AR4 GWP values are used for the Project. Generally, the changes from AR4 to AR5 are reductions in warming potential for the GHG most associated with construction and operation of typical development projects. The GWP from AR4 and AR5 and atmospheric lifetimes for key regulated GHGs are provided in Table IV.G-2 on page IV.G-6.

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<sup>9</sup> *Intergovernmental Panel on Climate Change, Fourth Assessment Report, Working Group I Report: The Physical Science Basis, 2007, Table 2.14.*

<sup>10</sup> *GWPs and associated CO<sub>2</sub>e values were developed by the Intergovernmental Panel on Climate Change (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 its Fourth Assessment Report (AR4). CARB has begun reporting GHG emission inventories for California using the GWP values from the IPCC AR4.*

<sup>11</sup> *State of California, Department of Justice, Office of the Attorney General, Climate Change Impacts in California, <https://oag.ca.gov/environment/impact>, accessed July 14, 2022.*

**Table IV.G-1  
Description of Identified GHGs<sup>a</sup>**

<b>Greenhouse Gas</b>	<b>General Description</b>
Carbon Dioxide (CO <sub>2</sub> )	An odorless, colorless GHG, which has both natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human-caused) sources of CO <sub>2</sub> are burning coal, oil, natural gas, and wood.
Methane (CH <sub>4</sub> )	A flammable gas and the main component of natural gas. When one molecule of CH <sub>4</sub> is burned in the presence of oxygen, one molecule of CO <sub>2</sub> and two molecules of water are released. A natural source of CH <sub>4</sub> is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH <sub>4</sub> , which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N <sub>2</sub> O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N <sub>2</sub> O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH <sub>4</sub> or ethane (C <sub>2</sub> H <sub>6</sub> ) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF <sub>6</sub> )	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF <sub>6</sub> is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF <sub>3</sub> )	An inorganic, non-toxic, odorless, non-flammable gas. NF <sub>3</sub> is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.

<sup>a</sup> GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.

Source: Association of Environmental Professionals, *Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007*; Environmental Protection Agency, *Acute Exposure Guideline Levels (AEGLs) for Nitrogen Trifluoride, January 2009*.

**Table IV.G-2  
Atmospheric Lifetimes and Global Warming Potentials**

<b>Gas</b>	<b>Atmospheric Lifetime (years)</b>	<b>Global Warming Potential (100-Year Time Horizon) (AR4 Assessment)</b>	<b>Global Warming Potential (100-Year Time Horizon) (AR5 Assessment)</b>
Carbon Dioxide (CO <sub>2</sub> )	50–200	1	1
Methane (CH <sub>4</sub> )	12 (+/-3)	25	28
Nitrous Oxide (N <sub>2</sub> O)	114	298	265
HFC-23: Fluoroform (CHF <sub>3</sub> )	270	14,800	12,400
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH <sub>2</sub> FCF <sub>3</sub> )	14	1,430	1,300
HFC-152a: 1,1-Difluoroethane (C <sub>2</sub> H <sub>4</sub> F <sub>2</sub> )	1.4	124	138
PFC-14: Tetrafluoromethane (CF <sub>4</sub> )	50,000	7,390	6,630
PFC-116: Hexafluoroethane (C <sub>2</sub> F <sub>6</sub> )	10,000	12,200	11,100
Sulfur Hexafluoride (SF <sub>6</sub> )	3,200	22,800	22,500
Nitrogen Trifluoride (NF <sub>3</sub> )	740	17,200	16,100

*Source: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials, [www.ipcc.ch/publications\\_and\\_data/ar4/wg1/en/ch2s2-10-2.html](http://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html), accessed July 14, 2022.*

## **b. Projected Impacts of Global Warming in California**

In 2009, California adopted a Statewide Climate Adaptation Strategy (CAS) that summarizes climate change impacts and recommends adaptation strategies across seven sectors: Public Health, Biodiversity and Habitat, Oceans and Coastal Resources, Water, Agriculture, Forestry, and Transportation and Energy. The California Natural Resources Agency will be updating the CAS and is responsible for preparing reports to the Governor on the status of the CAS. The Natural Resources Agency has produced climate change assessments, which detail impacts of global warming in California.<sup>12</sup> These include:

- Sea level rise, coastal flooding and erosion of California's coastlines would increase, as well as sea water intrusion.

<sup>12</sup> Paul R. Epstein, et al., *Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, Harvard Medical School and the Boston Public Health Commission, August 2003, unpaginated.*

- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply.
- Higher risk of forest fires resulting from increasing temperatures and making forests and brush drier. Climate change will affect tree survival and growth.
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes, resulting in public health impacts.
- Habitat destruction and loss of ecosystems due to climate change affecting plant and wildlife habitats.
- Global warming can cause drought, warmer temperatures, and saltwater contamination, resulting in impacts to California's agricultural industry.

With regard to public health, as reported by the Center for Health and the Global Environment at the Harvard Medical School, the following are examples of how climate change can affect cardio-respiratory disease: (1) pollen is increased by higher levels of atmospheric CO<sub>2</sub>; (2) heat waves can result in temperature inversions, leading to trapped masses or unhealthy air contaminants by smog, particulates, and other pollutants; and (3) the incidence of forest fires is increased by drought, secondary to climate change and to the lack of spring runoff from reduced winter snows. These fires can create smoke and haze, which can settle over urban populations causing acute and exacerbating chronic respiratory illness.<sup>13</sup>

### c. Regulatory Framework

There are a number of plans, regulations, programs, and agencies that provide policies, requirements, and guidelines regarding GHG emissions at the federal, State, regional, and local levels. As described below, these plans, guidelines, initiative, and laws include the following:

- Federal Clean Air Act
- Corporate Average Fuel Economy (CAFE) Standards
- Energy Independence and Security Act

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<sup>13</sup> *United States Environmental Protection Agency, Final Rule for Model Year 2021–2026 Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, published April 30, 2020.*

- California Air Resources Board
- California Greenhouse Gas Reduction Targets
- California Global Warming Solutions Act (AB 32)
- Climate Change Scoping Plan
- Cap-and-Trade Program
- Emission Performance Standards
- Renewables Portfolio Standard Program
- Clean Energy and Pollution Reduction Act
- Pavley Standards
- California Low Carbon Fuel Standard
- Advanced Clean Cars Regulations
- Sustainable Communities and Climate Protection Act (SB 375)
- Senate Bill 743
- Executive Order N-79-20
- California Appliance Efficiency Regulations
- Title 24, Building Standards Code and CALGreen Code
- CEQA Guidelines
- South Coast Air Quality Management District
- Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy
- Metro's 2019 Climate Action and Adaptation Plan
- Metro's Green Construction Policy
- Green New Deal Initiative
- City of Los Angeles Green Building Code
- City of Los Angeles Solid Waste Programs and Ordinances

- City of Los Angeles General Plan

## (1) Federal

### (a) *Federal Clean Air Act*

The USEPA is responsible for implementing federal policy to address GHGs. The United States Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO<sub>2</sub> and other GHGs are pollutants under the federal Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. In December 2009, USEPA issued an endangerment finding for GHGs under the CAA, setting the stage for future regulation.

The federal government administers a wide array of public-private partnerships to reduce the GHG intensity generated in the United States. These programs focus on energy efficiency, renewable energy, CH<sub>4</sub> and other non-CO<sub>2</sub> gases, agricultural practices, and implementation of technologies to achieve GHG reductions. USEPA implements numerous voluntary programs that contribute to the reduction of GHG emissions. These programs (e.g., the ENERGY STAR labeling system for energy-efficient products) play a significant role in encouraging voluntary reductions from large corporations, consumers, industrial and commercial buildings, and many major industrial sectors.

### (b) *Corporate Average Fuel Economy (CAFE) Standards*

In response to the *Massachusetts v. Environmental Protection Agency* ruling, President George W. Bush issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. The National Highway Traffic Safety Administration (NHTSA) subsequently issued multiple final rules regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011 and later for model years 2012–2016, and 2017–2021. In March 2020, the USDOT and the USEPA issued the final Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, which amends existing CAFE standards and tailpipe CO<sub>2</sub> emissions standards for passenger cars and light trucks and establishes new standards covering model years 2021 through 2026.<sup>14</sup> These standards set a combined fleet wide average of 36.9 to 37 for the model years affected.<sup>15</sup>

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<sup>14</sup> *National Highway Traffic Safety Administration (NHTSA), Corporate Average Fuel Economy Standards.*

<sup>15</sup> *USEPA, EPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.*

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO<sub>2</sub> emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines. Building on the first phase of standards, in August 2016, the USEPA and NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards are expected to lower CO<sub>2</sub> emissions by approximately 1.1 billion metric tons.<sup>16</sup>

*(c) 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; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and
- While superseded by the USEPA and NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

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<sup>16</sup> *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.*

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.”<sup>17</sup>

## (2) State

### (a) California Air Resources Board

The California Air Resources Board (CARB), a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, and provides oversight of local programs. CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hairspray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. CARB has primary responsibility for the development of California’s State Implementation Plan (SIP), for which it works closely with the federal government and the local air districts. The SIP is required for the State to take over implementation of the federal CAA. CARB also has primary responsibility for adopting regulations to meet the State’s goal of reducing GHG emissions. The State has met its goals to reduce GHG emissions to 1990 levels by 2020. Subsequent State goals include reducing GHG emissions to 40 percent below 1990 levels by 2030 and to 80 percent below 1990 levels by 2050.

### (b) California Greenhouse Gas Reduction Targets

#### (i) Executive Order S-3-05

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

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

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<sup>17</sup> *Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020.*

In accordance with Executive Order S-3-05, the Secretary of 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. The CAT provides periodic reports to the Governor and Legislature on the state of GHG reductions in the State, as well as strategies for mitigating and adapting to climate change.

The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

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

On April 29, 2015, Governor Brown issued Executive Order B-30-15. Therein, the Governor directed the following:

- Established a new interim Statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030.
- 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 CO<sub>2</sub>e (MMTCO<sub>2</sub>e).

*(iii) Executive Order B55-18*

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new Statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

In October 2020, CARB released a study, which evaluated three scenarios that achieve carbon neutrality in California by 2045. The study will be used by CARB in

development of the 2022 Scoping Plan update.<sup>18</sup> More ambitious carbon reduction scenarios that achieve carbon neutrality prior to 2045 may be considered as part of future analyses by the State.

The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario. The High CDR scenario achieves GHG reductions by relying on CO<sub>2</sub> removal strategies. The Zero Carbon Energy scenario is based on the assumption of zero-fossil fuel emissions by 2045. The Balanced scenario represents a middle point between the High CDR scenario and Zero Carbon Energy scenario. The scenarios would achieve at least an 80-percent reduction in GHGs by 2045, relative to 1990 levels. Remaining CO<sub>2</sub> would be reduced to zero by applying CO<sub>2</sub> removal strategies, including sinks from natural and working lands and negative emissions technologies, such as direct air capture.<sup>19,20</sup>

Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. Although specific details are not yet available for the GHG reduction measures discussed above, implementation of these measures would require regulations to be enforced by the State.

*(c) California Global Warming Solutions Act of 2006*

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. HSC Division 25.5 defines regulated GHGs as CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub> and represents the first enforceable Statewide program to limit emissions of these GHGs from all major industries, with penalties for noncompliance. The law further requires that reduction measures be technologically feasible and cost effective. Under HSC Division 25.5, CARB has the primary responsibility for reducing GHG emissions. CARB is required to adopt rules and regulations directing State actions that would achieve GHG emissions reductions.

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<sup>18</sup> *Sinks are defined as natural or artificial reservoirs that accumulate and store a carbon-containing chemical compound for an indefinite period.*

<sup>19</sup> *Energy+Environmental Economics (E3), Achieving Carbon Neutrality in California, PATHWAYS Scenarios Developed for the California Air Resources Board, October 2020, p. 22.*

<sup>20</sup> *CARB's list of discrete early action measures that could be adopted and implemented before January 1, 2010, was approved on June 21, 2007. The three adopted discrete early action measures are (1) a low-carbon fuel standard, which reduces carbon intensity in fuels Statewide; (2) reduction of refrigerant losses from motor vehicle air conditioning system maintenance; and (3) increased methane capture from landfills, which includes requiring the use of state-of-the-art capture technologies.*

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce Statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In order to achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG reductions.<sup>21</sup>

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197, and both were signed by Governor Brown. SB 32 and AB 197 amend HSC Division 25.5, establish a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of State climate policies reach disadvantaged communities. The new goals outlined in SB 32 update the scoping plan requirement of AB 32 and involve increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

AB 197, signed September 8, 2016, is a bill associated with SB 32 and signed on September 8, 2016, which prioritizes efforts to cut GHG emissions in low-income or minority communities. AB 197 requires CARB to make available, and update at least annually, on its website the emissions of GHGs, criteria pollutants, and toxic air contaminants for each facility that reports to CARB and air districts. In addition, AB 197 adds two members of the Legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the Legislature and the houses of the Legislature concerning the State's programs, policies, and investments related to climate change.

*(d) Climate Change Scoping Plan*

AB 32 required CARB to prepare a Climate Change Scoping Plan for achieving the maximum technologically feasible and cost-effective GHG emission reduction by 2020 (HSC Section 38561(h)). The 2008 Climate Change Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."<sup>22</sup> The 2008 Climate Change Scoping Plan had a range of GHG reduction actions, which included direct

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<sup>21</sup> CARB, *Climate Change Scoping Plan*, December 2008.

<sup>22</sup> For a discussion of Renewables Portfolio Standard, refer to Subsection 2.c.(2)(f)(i), *California Renewables Portfolio Standard*, on page .

regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a Cap-and-Trade Program, and an AB 32 implementation fee to fund the program.

The 2008 Climate Change Scoping Plan called for a “coordinated set of solutions” to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required to include more renewable energy sources through implementation of the Renewables Portfolio Standard (RPS).<sup>23</sup> Additionally, the 2008 Climate Change Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicates that substantial savings of electricity and natural gas will be accomplished through “improving energy efficiency by 25 percent.”

The 2008 Climate Change Scoping Plan identified a number of specific issues relevant to the Project, including:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting that:

*A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.*

- The importance of supporting the Department of Water Resources’ work to implement the Governor’s objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The Climate Change Scoping Plan notes that water use requires significant amounts of energy, including approximately one-fifth of Statewide electricity.

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<sup>23</sup> CARB, *First Update to the AB 32 Scoping Plan, 2014*.

- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

As required by HSC Division 25.5, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions reduction target for 2020. The 2020 emissions reduction target was originally set at 427 MMTCO<sub>2e</sub> using the GWP values from the IPCC SAR. Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California must make to return to the 1990 emissions level by 2020 as required by AB 32. CARB originally defined the “business-as-usual” or BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the 2008 Climate Change Scoping Plan, as approximately 596 MMTCO<sub>2e</sub> (using GWP values from the IPCC SAR). For example, in further explaining CARB’s BAU methodology, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. Therefore, under these original projections, the State would have had to reduce its 2020 BAU emissions by 28.4 percent to meet the 1990 target of 427 MMTCO<sub>2e</sub>.

*(i) 2014 Update to the Climate Change Scoping Plan*

The First Update to the Scoping Plan was approved by CARB in May 2014 and built upon the initial Scoping Plan with new strategies and recommendations.<sup>24</sup> In 2014, CARB revised the target using the GWP values from the IPCC AR4 and determined the 1990 GHG emissions inventory and 2020 GHG emissions limit to be increased to 431 MMTCO<sub>2e</sub>. CARB also updated the State’s 2020 BAU 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 had recently been adopted for motor vehicles and renewable energy. CARB’s projected Statewide 2020 emissions estimate using the GWP values from the IPCC AR4 was 509.4 MMTCO<sub>2e</sub>. Therefore, under the First Update to the Scoping Plan, the emission reductions necessary to achieve the 2020 emissions target of 431 MMTCO<sub>2e</sub> would have been 78.4 MMTCO<sub>2e</sub>, or a reduction of GHG emissions by approximately 15.4 percent (down from 28.4 percent).

The First Update “highlights California’s success to date in reducing its GHG emissions and lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.”<sup>25</sup>

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<sup>24</sup> CARB, *2014 Update, May 2014, p. 4.*

<sup>25</sup> CARB, *2014 Update, May 2014, p. 34.*

The First Update found that California was on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the State realizes the expected benefits of existing policy goals.<sup>26</sup>

In conjunction with the First Update, CARB identified “six key focus areas comprising major components of the State’s economy to evaluate and describe the larger transformative actions that will be needed to meet the State’s more expansive emission reduction needs by 2050.”<sup>27</sup> Those six areas are: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The First Update identified key recommended actions for each sector that will facilitate achievement of the 2050 reduction target.

Based on CARB’s research efforts, it has a “strong sense of the mix of technologies needed to reduce emissions through 2050.”<sup>28</sup> Those technologies include 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 the rapid market penetration of efficient and clean energy technologies.

The First Update discussed new residential and commercial building energy efficiency improvements, specifically identifying progress towards zero net energy buildings as an element of meeting mid-term and long-term GHG reduction goals. The First Update expressed CARB’s commitment to working with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to facilitate further achievements in building energy efficiency.

*(i) 2017 Update to the Climate Change Scoping Plan*

In response to the passage of SB 32 and the identification of the 2030 GHG reduction target, CARB adopted the 2017 Climate Change Scoping Plan in December 2017.<sup>29</sup> The 2017 Update built upon the framework established by the 2008 Climate Change Scoping Plan and the First Update while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a

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<sup>26</sup> CARB, *2014 Update, May 2014, p. 6.*

<sup>27</sup> CARB, *2014 Update, May 2014, p. 32.*

<sup>28</sup> CARB, *California’s 2017 Climate Change Scoping Plan, November 2017.*

<sup>29</sup> CARB, *2017 update, November 2017, p. 6.*

way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health. The 2017 Update included policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies addressed the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.<sup>30</sup>

CARB's projected Statewide 2030 emissions take into account 2020 GHG reduction policies and programs.<sup>31</sup> The 2017 Scoping Plan also addressed GHG emissions from natural and working lands of California, including the agriculture and forestry sectors. Under the Scoping Plan Scenario, the majority of the reductions would result from the continuation of the Cap-and-Trade regulation.<sup>32</sup> Additional reductions would be achieved from electricity sector standards (i.e., utility providers to supply 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. Implementation of mobile source strategies (cleaner technology and fuels) include the following:

- At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025
- At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030
- Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations
- Medium- and heavy-duty GHG Phase 2
- Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NO<sub>x</sub> standard.

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<sup>30</sup> CARB, 2017 update, November 2017.

<sup>31</sup> CARB, 2017 update, November 2017, p. 22.

<sup>32</sup> CARB, 2017 Update, November 2017, p. 97.

- Last Mile Delivery: New regulation that would result in the use of low NO<sub>x</sub> or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for Class 3–7 last mile delivery trucks in California. This measure assumes zero-emission vehicles (ZEVs) comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.
- Further reduce vehicle miles traveled (VMT) through continued implementation of SB 375 and regional SCS; forthcoming Statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.”

The alternatives in the 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 discussed 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.<sup>33</sup> Furthermore, local governments may have the ability to incentivize renewable energy, energy efficiency, and water efficiency measures.<sup>34</sup>

For individual projects under CEQA, the 2017 Scoping Plan stated that local governments can support climate action when considering discretionary approvals and entitlements. According to the 2017 Scoping Plan, lead agencies have the discretion to develop evidence-based numeric thresholds consistent with the Scoping Plan, the State’s long-term goals, and climate change science.<sup>35</sup>

The City has not developed per capita targets for 2030 or 2050; however, the City recognizes that GHG emissions reductions are necessary in the public and private sectors. The City has taken the initiative in combating climate change by developing programs, such as The City’s Green New Deal and Green Building Code. Each of these programs is discussed further below.

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<sup>33</sup> CARB, *2017 Update*, November 2017, p. 97.

<sup>34</sup> CARB, *2017 Update*, November 2017, p. 100.

<sup>35</sup> CARB, *California’s 2017 Climate Change Scoping Plan*, Appendix G, November 2017.

A summary of the GHG emissions reductions required under HSC Division 25.5 is provided in Table IV.G-3 on page IV.G-21.

Under the Scoping Plan Scenario, continuation of the Cap-and-Trade regulation (or carbon tax) is expected to cover approximately 34 to 79 MMTCO<sub>2</sub> of the 2030 reduction obligation.<sup>36</sup> The State's short-lived climate pollutants strategy, which is for GHGs that remain in the atmosphere for shorter periods of time compared to longer-lived GHGs, such as CO<sub>2</sub>, is expected to cover approximately 17 to 35 MMTCO<sub>2e</sub>. The RPS with 50 percent renewable electricity by 2030 is expected to cover approximately 3 MMTCO<sub>2</sub>. 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, and is expected to cover approximately 11 to 13 MMTCO<sub>2</sub>. Under the Scoping Plan Scenario, CARB expects that the reduction in GHGs from doubling of the energy efficiency savings in natural gas and electricity end uses in the CEC 2015 Integrated Energy Policy Report by 2030 would cover approximately 7 to 9 MMTCO<sub>2</sub> of the 2030 reduction obligation. The other strategies would be expected to cover the remaining 2030 reduction obligations.

#### *(e) Cap-and-Trade Program*

The Climate Change Scoping Plan identified a Cap-and-Trade Program as one of the strategies California would employ to reduce GHG emissions. CARB asserts that this program will help put California on the path to meet its goal of ultimately achieving an 80-percent reduction from 1990 levels by 2050. Under Cap-and-Trade, an overall limit on GHG emissions from capped sectors was established, and facilities subject to the cap will be able to trade permits to emit GHGs.

CARB designed and adopted a California Cap-and-Trade Program<sup>37</sup> pursuant to its authority under AB 32. The Cap-and-Trade Program was designed to reduce GHG emissions from public and private major sources (deemed "covered entities") by setting a firm cap on Statewide GHG emissions and employing market mechanisms to achieve the State's emission-reduction mandates. The Statewide cap for GHG emissions from the capped sectors<sup>38</sup> (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the Program's duration.

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<sup>36</sup> *California Code of Regulations 17, Sections 95800–96023.*

<sup>37</sup> *California Code of Regulations 17, Sections 95811, 95812.*

<sup>38</sup> *California Code of Regulations 17, Section 95812.*

**Table IV.G-3  
Estimated Statewide Greenhouse Gas Emissions Reductions Required by HSC Division 25.5**

Emissions Scenario	GHG Emissions (MMTCO <sub>2e</sub> )
2008 Scoping Plan (IPCC SAR)	
2020 BAU Forecast (CARB 2008 Scoping Plan Estimate)	596
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	427
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2020	169 (28.4%) <sup>a</sup>
2014 Scoping Plan Update (IPCC AR4)	
2020 BAU Forecast (CARB 2014 Scoping Plan Estimate)	509.4
2020 Emissions Target Set by AB 32 (i.e., 1990 level)	431
Reduction below Business-As-Usual necessary to achieve 1990 levels by 2020	78.4 (15.4%) <sup>b</sup>
2017 Scoping Plan Update	
2030 BAU Forecast ("Reference Scenario" which includes 2020 GHG reduction policies and programs)	389
2030 Emissions Target Set by HSC Division 25.5 (i.e., 40% below 1990 Level)	260
Reduction below Business-As-Usual Necessary to Achieve 40% below 1990 Level by 2030	129 (33.2%) <sup>c</sup>
<hr/> <p><i>MMTCO<sub>2e</sub> = million metric tons of carbon dioxide equivalents</i></p> <p><sup>a</sup> <math>596 - 427 = 169 / 596 = 28.4\%</math></p> <p><sup>b</sup> <math>509.4 - 431 = 78.4 / 509.4 = 15.4\%</math></p> <p><sup>c</sup> <math>389 - 260 = 129 / 389 = 33.2\%</math></p> <p><i>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, <a href="http://ww2.arb.ca.gov/ghg-bau">ww2.arb.ca.gov/ghg-bau</a>, accessed July 14, 2022; CARB, California's 2017 Climate Change Scoping Plan, November 2017.</i></p>	

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities that emit more than 25,000 MTCO<sub>2e</sub> per year must comply with the Cap-and-Trade Program.<sup>39</sup> Triggering of the 25,000 MTCO<sub>2e</sub> per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).<sup>40</sup>

<sup>39</sup> *California Code of Regulations 17, Sections 95100–95158*

<sup>40</sup> *Compliance instruments are permits to emit, the majority of which will be "allowances," but entities also are allowed to use CARB-approved offset credits to meet up to 8% of their compliance obligations.*

Each covered entity with a compliance obligation is required to surrender “compliance instruments”<sup>41</sup> for each MTCO<sub>2</sub>e of GHG they emit. Covered entities are allocated free allowances in whole or part (if eligible), and can buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Regulation provides a firm cap, ensuring that the Statewide emission limits will not be exceeded. 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 in AB 32, 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.

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.<sup>42</sup> Accordingly, for projects that are subject to the CEQA, GHG emissions from electricity consumption are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program’s first compliance period.<sup>43</sup>

The Program applies to emissions that cover approximately 80 percent of the State’s GHG emissions. Demonstrating the efficacy of AB 32 policies, California achieved its 2020 GHG Reduction Target four years earlier than mandated. The largest reductions were the result of increased renewable electricity in the electricity sector, which is a covered sector in the Cap-and-Trade Program.

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.

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<sup>41</sup> *California Code of Regulations 17, Section 95811(b).*

<sup>42</sup> *California Code of Regulations 17, Sections 95811, 95812(d).*

<sup>43</sup> *CARB, California’s 2017 Climate Change Scoping Plan, Table 3, p. 31, November 2017. Calculated as:  $(108 - 53) / 260 = 21$  percent.*

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(f) *Energy-Related (Stationary) Sources*

(i) *Emission Performance Standards*

SB 1368, signed September 29, 2006, is a companion bill to AB 32, which requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32.

(ii) *Renewables Portfolio Standard*

SB 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017 as an RPS. Subsequent amendments provided additional targets throughout the years. Most recently, on October 7, 2015, SB 350 (Chapter 547, Statutes of 2015), also known as the Clean Energy and Pollution Reduction Act, 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. SB 350 also requires the State to double Statewide energy efficiency savings in electricity and natural gas end uses by 2030. The 2017 Climate Change Scoping Plan incorporated the SB 350 standards and estimated the GHG reductions would account for approximately 21 percent of the Scoping Plan reductions.<sup>44</sup> On September 10, 2018, SB 100, provided additional RPS targets of 44 percent by 2024, 52 percent by 2027, and 60 percent by 2030, and that CARB should plan for 100 percent eligible renewable energy resources and zero-carbon resources by 2045.<sup>45</sup>

(f) *Mobile Sources*

(i) *Pavley Standards*

AB 1493 (Chapter 200, Statutes of 2002), 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 2004, CARB approved the Pavley regulation to require automakers to control GHGs from new passenger vehicles for the 2009 through 2016 model years. Upon adoption of subsequent federal GHG standards by the USEPA that preserved the benefits

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<sup>44</sup> *California Legislative Information, SB-100 California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.*

<sup>45</sup> *United States Environmental Protection Agency, 2012.*

of the Pavley regulations, the Pavley regulations were revised to accept compliance with the federal standards as compliance with California's standards in the 2012 through 2016 model years. This is referred to as the "deemed to comply" option.

In January 2012, CARB approved GHG regulations, which require further reductions in passenger GHGs for 2017 and subsequent vehicle model years. As noted above, in August 2012, the USEPA and USDOT adopted GHG emission standards for model year 2017 through 2025 vehicles.<sup>46</sup> On November 15, 2012, CARB approved an amendment that allows manufacturers to comply with the 2017–2025 national standards to meet State law. Automobile manufacturers generally comply with these standards through a combination of improved energy efficiency in vehicle equipment (e.g., air conditioning systems) and engines, as well as sleeker aerodynamics, use of strong but lightweight materials, and lower-rolling resistance tires.<sup>47</sup>

In 2018, the USEPA proposed the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE), which would roll back fuel economy standards and revoke California's waiver. The rule amended certain average fuel economy and GHG standards for passenger cars covering model years 2021 through 2026. On March 30, 2020, the SAFE Rule was finalized and published in the Federal Register, commencing a review period. Subsequent legal challenges from a coalition of states, including California, and private industry groups were issued. However, in December 2021, the NHTSA repealed the SAFE Vehicle Rule Part One.<sup>48</sup> Although the SAFE Vehicle Rule Part One has been repealed, GHG modeling contained in regional plans, such as SCAG's 2020-2045 RTP/SCS, have not been updated to account for this repeal.

#### *(ii) California Low Carbon Fuel Standard*

Executive Order S-01-07 was enacted by Governor Arnold Schwarzenegger on January 18, 2007. The order mandates the following: (1) that a Statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and (2) that a LCFS for transportation fuels be established in California. The final regulation was approved by the State's Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the LCFS became effective on the same day. In September 2015, CARB approved the readoption of the LCFS, which

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<sup>46</sup> CARB, *California's Advanced Clean Cars Midterm Review*, pp. ES-17, C-9.

<sup>47</sup> *Federal Register*. Vol. 86, No. 247, December 29, 2021.

<sup>48</sup> CARB, *Low Carbon Fuel Standard, About*, [ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about](http://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about), accessed July 14, 2022.

became effective on January 1, 2016, to address procedural deficiencies in the way the original regulation was adopted.<sup>49</sup>

The development of the 2017 Scoping Plan Update has identified LCFS as a regulatory measure to reduce GHG emission to meet the 2030 emissions target. In September 2018, the standards were amended by CARB to require a 20-percent reduction in carbon intensity by 2030, aligning with California's 2030 targets set by SB 32.<sup>50</sup>

### *(iii) Advanced Clean Cars Regulations*

In 2012, CARB approved the Advanced Clean Cars program, an emissions-control program for model years 2015–2025.<sup>51</sup> The components of the Advanced Clean Cars program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the 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.<sup>52</sup> During the March 2017 midterm review, CARB voted unanimously to continue with the vehicle GHG emission standards and the ZEV program for cars and light trucks sold in California through 2025.<sup>53</sup>

In addition, Governor Gavin Newsom signed an executive order (Executive Order No. N-79-20) on September 23, 2020, that would phase out sales of new gas-powered passenger cars by 2035 in California with an additional 10-year transition period for heavy vehicles. The State would not restrict used car sales or forbid residents from owning gas-powered vehicles. In accordance with the executive order, CARB is developing a 2020 Mobile Source Strategy, a comprehensive analysis that presents scenarios for possible strategies to reduce the carbon, toxic and unhealthy pollution from cars, trucks, equipment, and ships. The strategies will provide important information for numerous regulations and incentive programs going forward by conveying what is necessary to address the aggressive emission reduction requirements.

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<sup>49</sup> CARB, *Advanced Clean Cars Program, About*, [ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about](http://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about), accessed July 14, 2022.

<sup>50</sup> CARB, *California's Advanced Clean Cars Program*, [ww2.arb.ca.gov/our-work/topics/clean-cars](http://ww2.arb.ca.gov/our-work/topics/clean-cars), accessed July 14, 2022.

<sup>51</sup> CARB, *California's Advanced Clean Cars Program*, [ww2.arb.ca.gov/our-work/topics/clean-cars](http://ww2.arb.ca.gov/our-work/topics/clean-cars), accessed July 14, 2022.

<sup>52</sup> CARB, *News Release: CARB finds vehicle standards are achievable and cost-effective*, [ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective](http://ww2.arb.ca.gov/news/carb-finds-vehicle-standards-are-achievable-and-cost-effective), accessed July 14, 2022.

<sup>53</sup> *State of California, Senate Bill No. 375, September 30, 2008.*

The primary mechanism for achieving the ZEV target for passenger cars and light trucks is CARB's Advanced Clean Cars II (ACC II) Program. The ACC II regulations will focus on post-2025 model year light-duty vehicles, as requirements are already in place for new vehicles through the 2025 model year. A rulemaking package is anticipated to be presented to the Board members in June 2022.

*(iv) Sustainable Communities and Climate Protection Act*

The Sustainable Communities and Climate Protection Act of 2008, or SB 375 (Chapter 728, Statutes of 2008), which was adopted by the State on September 30, 2008, establishes mechanisms for the development of regional targets for reducing passenger vehicle GHG emissions. SB 375 finds that the "transportation sector is the single largest contributor of greenhouse gases of any sector."<sup>54</sup> Under SB 375, CARB is required, in consultation with the Metropolitan Planning Organizations (MPOs), to set regional GHG reduction targets for the passenger vehicle and light-duty truck sector for 2020 and 2035. SCAG is the MPO in which the City is located. CARB set targets for 2020 and 2035 for each of the 18 MPO regions in 2010 and updated them in 2018.<sup>55</sup> In March 2018, CARB updated the SB 375 targets for the SCAG region to require an 8-percent reduction by 2020 and a 19-percent reduction by 2035 in per capita passenger vehicle GHG emissions.<sup>56</sup> As discussed further below, in September 2020, SCAG adopted an updated Regional Transportation Plan/Sustainable Community Strategies (2020–2045 RTP/SCS) subsequent to the update of the emission targets. The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State's GHG emission reduction goals.<sup>57</sup>

Under SB 375, the target must be incorporated within that region's RTP, which is used for long-term transportation planning, in an 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 plans) are not required to be consistent with either the RTP or SCS.

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<sup>54</sup> CARB, *Sustainable Communities & Climate Protection Program, About*, [ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about](http://ww2.arb.ca.gov/our-work/programs/sustainable-communities-climate-protection-program/about), accessed July 14, 2022.

<sup>55</sup> CARB, *SB 375 Regional Greenhouse Gas Emissions Reduction Targets, 2018*.

<sup>56</sup> SCAG, *Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, 2020*, p. 5.

<sup>57</sup> California Building Standards Commission, *2010 California Green Building Standards Code, (2010)*.

*(v) Senate Bill 743*

Governor Jerry Brown signed Senate Bill (SB) 743 in 2013, which creates a process to change the way that transportation impacts are analyzed under CEQA. Specifically, SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) methodology for evaluating transportation impacts. Particularly within areas served by transit, the required alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

*(h) Building Standards and Other Regulations*

*(i) California Appliance Efficiency Regulations*

The Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608), adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

*(ii) Title 24, Building Standards Code and CALGreen Code*

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, 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 standard. The standards are updated periodically to allow for the consideration and inclusion of new energy efficiency technologies and methods.

Part 11 of the Title 24 Building Standards is referred to as the California Green Building Standards (CALGreen) Code and was developed to help the State achieve its GHG reduction goals under HSC Division 25.5 (e.g., AB 32) by codifying standards for reducing building-related energy, water, and resource demand, which in turn reduces GHG emissions from energy, water, and resource demand. 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 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.”<sup>58</sup> 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.<sup>59</sup>

On May 9, 2018, the CEC adopted the 2019 Title 24 Standards, which went into effect on January 1, 2020. The 2019 standards continue to improve upon the previous (2016) Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.<sup>60</sup> The 2019 Title 24 Standards ensure that builders use the most energy efficient and energy conserving technologies and construction practices. As described in the 2019 Title 24 Standards, the standards represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the Zero Net Energy (ZNE) goal.” Single-family homes built with the 2019 Title 24 Standards are projected to use approximately seven percent less energy due to energy efficiency measures versus those built under the 2016 standards. Once the mandated rooftop solar electricity generation is factored in, homes built under the 2019 standards will use about 53 percent less energy than those under the 2016 standards. Nonresidential buildings are projected to use approximately 30 percent less energy due mainly to lighting upgrades.<sup>61</sup> Compliance with Title 24 is enforced through the building permit process.

### *(iii) CEQA Guidelines*

In August 2007, the California State Legislature adopted SB 97 (Chapter 185, Statutes of 2007), requiring OPR to prepare and transmit new CEQA Guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the CEQA Guidelines.<sup>62</sup> The CEQA Guidelines require a lead

<sup>58</sup> *California Building Standards Commission, 2010 California Green Building Standards Code, (2010).*

<sup>59</sup> *CEC, 2019 Building Energy Efficiency Standards.*

<sup>60</sup> *CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.*

<sup>61</sup> *See 14 Cal. Code Regs. §§ 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).*

<sup>62</sup> *14 Cal. Code Regs. § 15064.4(b).*

agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. Discretion is given to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, three factors are identified 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.<sup>63</sup>

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.”<sup>64</sup>

### (3) Regional

#### *(a) South Coast Air Quality Management District CEQA Guidance*

The City 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 Gorgonio Pass area in Riverside County. The South Coast Air Quality Management District (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. This is accomplished through air quality monitoring, evaluation, education, implementation of control measures to reduce emissions from stationary sources, permitting and inspection of pollution sources, enforcement of air quality regulations, and by supporting and implementing measures to reduce emissions from motor vehicles.

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<sup>63</sup> Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

<sup>64</sup> SCAQMD, Board Meeting, December 5, 2008, Agenda No. 31, [www3.aqmd.gov/hb/2008/December/081231a.htm](http://www3.aqmd.gov/hb/2008/December/081231a.htm), accessed July 14, 2022.

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.<sup>65</sup> A GHG Significance Threshold Working Group was formed to further evaluate potential GHG significance thresholds.<sup>66</sup> The SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO<sub>2e</sub> per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO<sub>2e</sub> per year would be assumed to have a less-than-significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO<sub>2e</sub> per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects). The Working Group has been inactive since 2011, and SCAQMD has not formally adopted any GHG significance threshold for other jurisdictions.

*(b) SCAG Regional Transportation Plan/Sustainable Communities Strategy*

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS in September 2020, which was prepared to reflect SB 32. The vision for the region incorporates a range of best practices for increasing transportation choices, reducing dependence on personal automobiles, further improving air quality, and encouraging growth in walkable, mixed-use communities with ready access to transit infrastructure and employment. More and varied housing types and employment opportunities would be located in and near job centers, transit stations and walkable neighborhoods where goods and services are easily accessible via shorter trips. To support shorter trips, people would have the choice of using neighborhood bike networks, car share or micro-mobility services like shared bicycles or scooters. For longer commutes, people would have expanded regional transit services and more employer incentives to carpool or vanpool. Other longer trips would be supported by on-demand services such as microtransit, carshare, and citywide partnerships with ride hailing services. For those that choose to drive, hotspots of congestion would be less difficult to navigate due to cordon pricing and using an electric vehicle will be easier due to an expanded regional charging network.

The 2020–2045 RTP/SCS states that the SCAG region was home to about 18.8 million people in 2016 and currently includes approximately 6.0 million homes and

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<sup>65</sup> SCAQMD, *Greenhouse Gases CEQA Significance Thresholds*, [www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds), accessed July 14, 2022.

<sup>66</sup> *2020–2045 RTP/SCS population growth forecast methodology includes data for years 2010, 2010, 2016, and 2045.*

8.4 million jobs.<sup>67</sup> By 2045, the integrated growth forecast estimates that these figures will increase by 3.7 million people, with nearly 1.6 million more homes and 1.6 million more jobs. Transit Priority Areas<sup>68</sup> (TPAs) will account for less than 1 percent of regional total land but are projected to accommodate 30 percent of future household growth between 2020 and 2045. The 2020–2045 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s TPAs. TPAs 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.

The 2020–2045 RTP/SCS is expected to reduce per capita transportation emissions by 19 percent by 2035, which is consistent with SB 375 compliance with respect to meeting the State’s GHG emission reduction goals.<sup>69</sup> Due to fuel economy and efficiency improvements, GHG emission rates of model year 2017 vehicles have decreased by 15 to 20 percent when compared to model year 2008 and earlier vehicles. However, for purposes of SB 375 emissions reduction targets, the fuel economy improvements have been largely excluded from the reduction calculation. The SB 375 target focuses on the amount of vehicle travel per capita. As discussed above, OPR recommended that achieving 15 percent lower per capita (residential) or per employee (office) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State’s emissions goals (i.e., SB 375 goal). The reductions generated by fuel economy improvements are already included as part of the State’s GHG emissions reduction program and are not double-counted in the SB 375 target calculation.

*(c) Metro’s 2019 Climate Action and Adaptation Plan*

Approved by the Metro Board of Directors on September 24, 2020, the Moving Beyond Sustainability Plan establishes agency-wide sustainability goals, targets, and strategies for the next ten years. The Plan includes goals regarding energy, water, emissions and pollution control, materials and construction/operations, climate adaptation and resiliency, livable neighborhoods, equity, and economic and workforce development. Metro has also prepared the 2019 Climate Action and Adaptation Plan (2019 CAAP) that commits the agency to reducing greenhouse gas emissions by 79 percent relative to 2017

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<sup>67</sup> Defined by the 2020–2045 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a major transit stop (rail or bus rapid transit station) with 15-minute or less service frequency during peak commute hours.

<sup>68</sup> SCAG, *Final 2020–2045 RTP/SCS, Chapter 0: Making Connections, 2020*, p. 5.

<sup>69</sup> *City of Los Angeles, Sustainable City pLAN, April 2015*.

levels by 2030 and 100 percent by 2050. The 2019 CAAP identified a goal of reducing Metro's GHG emissions per boarding by 5 percent from 2010 to 2020. The 2019 CAAP updated the agency's commitment to reducing operational greenhouse gas emissions by 79 percent relative to 2017 levels by 2030 and 100 percent by 2050. Operational emissions are broken down into three sources, or scopes. Scope 1 emissions include direct GHG emissions from equipment and facilities owned and/or operated by Metro. Scope 2 includes indirect GHG emissions from electricity purchases. Scope 3 includes all other Metro activities from sources owned or controlled by another company or entity, including: business travel, embodied emission in material goods purchased and service contracted by Metro, emissions from landfilled solid waste, and emissions from Metro employee commute patterns. The 2019 CAAP includes thirteen mitigation measures to reduce GHG emissions, most of which are aimed at reducing Scope 1 and Scope 2 emissions.

*(d) Metro's Green Construction Policy*

Metro adopted a Green Construction Policy in August 2011 and is committed to using more sustainable construction equipment and vehicles, as well as implementing best practices, to reduce harmful diesel emissions from all Metro construction projects performed on Metro properties and in Metro right of ways. The Green Construction Policy encourages the use of construction equipment with technologies such as hybrid drives and specific fuel economy standards, both of which are methods to reduce GHG emissions during the construction period. From January 2015 onwards, the Green Construction Policy has required all off-road, diesel-powered construction equipment greater than 50 horsepower to meet Tier 4 off-road emission standards at a minimum.

**(4) Local**

*(a) City of Los Angeles Green New Deal*

The City addressed the issue of global climate change in *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan/ClimateLA) in 2007. This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities.

Subsequently on April 8, 2015, Mayor Eric Garcetti released the Sustainable City pLAN, which includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.<sup>70</sup>

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<sup>70</sup> City of Los Angeles. *LA's Green New Deal, Sustainable City Plan 2019*.

In April 2019, the Sustainability City pLAN was updated and renamed as L.A.'s Green New Deal, which consists of a program of actions designed to create sustainability-based performance targets through 2050 to advance economic, environmental, and equity objectives.<sup>71</sup> The City's Green New Deal augments, expands, and elaborates the City's vision for a sustainable future and tackles the climate emergency with accelerated targets and new aggressive goals. These plans are intended to guide City departments in their future planning and regulation formulation. These plans do not establish binding policies on private development.

- While not a plan adopted solely to reduce GHG emissions, within the City's Green New Deal, "Climate Mitigation," or reduction of GHG is one of eight explicit benefits that help define its strategies and goals.

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

On December 11, 2019, the Los Angeles City Council approved Ordinance No. 186,488, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2019 CALGreen Code. Projects filed on or after January 1, 2020, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

*(c) City of Los Angeles Solid Waste Programs and Ordinances*

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced as well as disposal energy averted. In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices, such as source reduction, recycling, and environmentally safe land disposal.

The City has developed and is in the process of implementing the Solid Waste Integrated Resources Plan, also referred to as the Zero Waste Plan, the goal of which is to

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<sup>71</sup> LASAN, *Final Program Environmental Impact Report Solid Waste Integrated Resources Plans*, December 2014.

lead the City towards being a “zero waste” City by 2030.<sup>72</sup> These waste reduction plans, policies, and regulations, along with Mayoral and City Council directives, have increased the level of waste diversion for the City to 76 percent as of 2013.<sup>73</sup> In addition, the City adopted the Recovering Energy, Natural Resources, and Economic Benefit from Waste for Los Angeles (RENEW LA) Plan in 2006, which aims to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources not going to disposal and achieving a diversion rate of 90 percent or more by 2025.<sup>74</sup> The City also approved the Waste Hauler Permit Program (Ordinance No. 181,519, LAMC Chapter VI, Article 6, Section 66.32-66.32.5), which requires private waste haulers to obtain AB 939 Compliance Permits to transport construction and demolition waste to City-certified construction and demolition waste processors. The City’s Exclusive Franchise System Ordinance (Ordinance No. 182,986), among other requirements, sets a maximum annual disposal level and diversion requirements for franchised waste haulers to promote waste diversion from landfills and support the City’s zero waste goals. These programs reduce the number of trips to haul solid waste and, therefore, reduce the amount of petroleum-based fuels and energy used to process solid waste.

*(d) City of Los Angeles General Plan*

The City does not have a General Plan Element specific to climate change and GHG emissions, and its General Plan does not have any stated goals, objectives, or policies specifically addressing climate change and GHG emissions. However, the following five goals from the City’s General Plan Air Quality Element would also lead to GHG emission reductions.<sup>75</sup>

- Less reliance on single-occupancy vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;

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<sup>72</sup> *City of Los Angeles, Department of Public Works, LA Sanitation, Recycling. [www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?\\_adf.ctrl-state=kq9mn3h5a\\_188](http://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=kq9mn3h5a_188), accessed July 14, 2022.*

<sup>73</sup> *City of Los Angeles, RENEW LA, Five-Year Milestone Report, 2011.*

<sup>74</sup> *City of Los Angeles, Air Quality Element, June 1991, pp. IV-1 to IV-4.*

<sup>75</sup> *California Energy Commission, Tracking Progress Greenhouse Gas Emissions Reductions, December 2018.*

- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels, and the implement of conservation measures, including passive measures, such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

## d. Existing Conditions

### (1) Existing Statewide GHG Emissions

GHG emissions are the result of both natural and human-influenced activities. Regarding human-influenced activities, motor vehicle travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfires are the primary sources of GHG emissions. Without human intervention, Earth maintains an approximate balance between the emission of GHGs into the atmosphere and the storage of GHGs in oceans and terrestrial ecosystems. Events and activities, such as the industrial revolution and the increased combustion of fossil fuels (e.g., gasoline, diesel, coal, etc.), have contributed to the rapid increase in atmospheric levels of GHGs over the last 150 years. As reported by the CEC, California contributes 1 percent of global and 6 percent of national GHG emissions.<sup>76</sup> California represents approximately 12 percent of the national population. Approximately 80 percent of GHGs in California consist of CO<sub>2</sub> produced from fossil fuel combustion. The current California GHG inventory compiles Statewide anthropogenic GHG emissions and carbon sinks/storage from years 2000 to 2019.<sup>77</sup> It includes estimates for CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>. The GHG inventory for California for years 2012 through 2018 is presented in Table IV.G-4 on page IV.G-36. As shown in Table IV.G-4, the GHG inventory for California in 2019 was 418.2 MMTCO<sub>2</sub>e. Based on data presented above, the 2016 Statewide GHG inventory fell below 1990 levels, which achieves the AB 32 target of reducing Statewide GHG emissions to below 1990 levels (431 MMTCO<sub>2</sub>e) by 2020.<sup>78</sup>

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<sup>76</sup> A carbon inventory identifies and quantifies sources and sinks of greenhouse gases. Sinks are defined as a natural or artificial reservoir that accumulates and stores some carbon-containing chemical compound for an indefinite period.

<sup>77</sup> CARB, *Climate pollutants fall below 1990 levels for first time*, [ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time](http://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time), accessed July 14, 2022.

<sup>78</sup> See, generally, Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.

**Table IV.G-4  
California GHG Inventory  
(million metric tons CO<sub>2</sub>e)**

	2013	2014	2015	2016	2017	2018	2019
<b>Transportation</b>	161.24	162.56	166.19	169.76	171.18	169.63	166.14
<i>On Road</i>	147.15	147.85	151.2	155.16	156.57	154.57	151.58
Passenger Vehicles	111.52	112.2	166.32	119.02	120.12	119.48	119.11
Heavy Duty Trucks	35.62	35.65	34.88	36.14	36.45	35.09	32.47
<i>Ships &amp; Commercial Boats</i>	3.86	3.95	3.89	3.72	3.82	3.74	3.84
<i>Aviation (Intrastate)</i>	3.93	3.9	4.22	4.44	4.68	4.65	4.36
<i>Rail</i>	2.4	2.63	2.42	2.17	1.83	2.22	1.6
<i>Off Road</i>	2.33	2.43	2.53	2.63	2.73	2.83	2.93
<i>Unspecified</i>	1.57	1.79	1.93	1.64	1.55	1.61	1.83
<i>Percent of Total Emissions</i>	36%	37%	38%	40%	40%	40%	40%
<b>Electric Power</b>	91.39	88.85	84.83	68.57	62.13	63.11	58.83
<i>In-State Generation</i>	51.41	52.05	50.88	42.2	38.18	38.54	37.16
Natural Gas	47.66	47.07	46.19	38.18	34.65	35	33.65
Other Fuels	2.88	4.11	3.57	2.61	2.66	2.71	2.72
Fugitive and Process Emissions	0.87	0.88	1.12	1.42	0.88	0.83	0.8
<i>Imported Electricity</i>	39.99	36.8	33.94	26.36	23.95	24.57	21.67
<i>Unspecified Imports</i>	11.83	13.45	11.22	9.69	8.85	11.57	9.9
<i>Specified Imports</i>	28.15	23.35	22.72	16.67	15.1	13	11.77
<i>Percent of Total Emissions</i>	20%	20%	19%	16%	15%	15%	14%
<b>Commercial and Residential</b>	44.18	38.23	38.84	40.61	41.27	41.36	43.81
<i>Residential Fuel Use</i>	28.99	23.8	24.22	25.25	25.99	25.74	27.95
Natural Gas	26.53	21.58	21.9	22.8	23.62	23.23	25.31
Other Fuels	1.59	1.34	1.43	1.56	1.48	1.62	1.74
Fugitive Emissions	0.88	0.89	0.89	0.89	0.89	0.9	0.9
<i>Commercial Fuel Use</i>	13.29	12.49	12.69	13.14	12.99	13.46	13.67
Natural Gas	11.28	10.4	10.5	10.9	11.06	11.13	11.55
Other Fuels	2	2.09	2.18	2.24	1.93	2.32	2.12
<i>Commercial Cogeneration Heat Output</i>	0.5	0.52	0.52	0.78	0.85	0.72	0.74
<i>Other Commercial and Residential</i>	1.4	1.41	1.42	1.43	1.44	1.44	1.45
<i>Percent of Total Emissions</i>	10%	9%	9%	9%	10%	10%	10%
<b>Industrial</b>	91.67	92.51	90.27	88.99	88.79	89.17	88.18
<i>Refineries</i>	29.43	29.78	28.35	29.78	30.05	30.07	28.82
<i>General Fuel Use</i>	19.47	19.91	19.41	19.24	18.79	18.56	19.83
Natural Gas	14.37	15.38	14.63	15.42	15.01	15.49	16.87
Other Fuels	5.1	4.53	4.78	3.82	3.78	3.07	2.96
<i>Oil &amp; Gas Extraction<sup>a</sup></i>	18.92	19.2	19.27	16.75	16.87	16.68	16.58
Fuel Use	16.94	17.17	17.22	14.84	14.94	14.61	14.31
Fugitive Emissions	1.98	2.03	2.05	1.91	1.93	2.08	2.27

**Table IV.G-4 (Continued)**  
**California GHG Inventory**  
**(million metric tons CO<sub>2</sub>e)**

	2013	2014	2015	2016	2017	2018	2019
<i>Cement Plants</i>	7.21	7.66	7.47	7.6	7.66	7.88	7.78
Clinker Production	4.47	4.78	4.69	4.67	4.85	4.96	4.92
Fuel Use	2.74	2.88	2.77	2.93	2.81	2.91	2.86
<i>Cogeneration Heat Output</i>	9.01	8.25	7.98	7.84	7.59	8.1	7.39
<i>Other Process Emissions</i>	7.64	7.69	7.8	7.78	7.83	7.87	7.79
Natural Gas Transmission & Distribution	3.82	3.87	3.94	3.99	4.01	4.02	4.09
Manufacturing	0.19	0.16	0.18	0.1	0.11	0.1	0.11
Wastewater Treatment	1.85	1.86	1.85	1.85	1.86	1.92	1.92
Other	1.78	1.79	1.82	1.84	1.85	1.83	1.67
<i>Percent of Total Emissions</i>	20%	21%	20%	21%	21%	21%	21%
<b>Recycling and Waste</b>	8.35	8.4	8.47	8.57	8.66	8.74	8.85
<i>Landfills<sup>b</sup></i>	8.05	8.09	8.15	8.23	8.31	8.37	8.48
<i>Composting</i>	0.3	0.31	0.33	0.34	0.35	0.36	0.38
<i>Percent of Total Emissions</i>	2%	2%	2%	2%	2%	2%	2%
<b>High Global Warming Potential</b>	16.75	17.73	18.6	19.24	19.97	20.38	20.58
<i>Ozone Depleting Substance Substitutes</i>	16.38	17.42	18.32	19	19.64	20.9	20.3
<i>Electricity Grid SF6 Losses<sup>c</sup></i>	0.29	0.17	0.14	0.1	0.18	0.14	0.14
<i>Semiconductor Manufacturing<sup>b</sup></i>	0.08	0.14	0.14	0.14	0.15	0.15	0.14
<i>Percent of Total Emissions</i>	4%	4%	4%	5%	5%	5%	5%
<b>Agriculture<sup>d</sup></b>	33.83	34.68	33.53	33.29	32.49	32.75	31.75
<i>Livestock</i>	22.92	23.24	22.66	22.57	22.89	22.92	22.6
Enteric Fermentation (Digestive Process)	11.22	11.28	10.95	10.93	11.14	11.13	10.97
Manure Management	11.71	11.96	11.7	11.64	11.75	11.69	11.63
<i>Crop Growing &amp; Harvesting</i>	7.2	6.92	6.48	6.75	6.49	6.7	6.62
Fertilizers	5.52	5.45	4.93	5.03	5.02	5.07	5.03
Soil Preparation and Disturbances	1.59	1.39	1.47	1.63	1.38	1.54	1.49
Crop Residue Burning	0.08	0.08	0.08	0.08	0.09	0.09	0.1
<i>General Fuel Use</i>	3.71	4.51	4.4	3.97	3.11	3.23	2.54
Diesel	2.53	3.39	3.66	3.21	2.4	2.48	1.85
Natural Gas	0.69	0.63	0.64	0.72	0.67	0.74	0.68
Gasoline	0.49	0.49	0.1	0.04	0.05	0.01	0.01
Other Fuels	0	0	0	0	0	0	0
<i>Percent of Total Emissions</i>	8%	8%	8%	8%	8%	8%	8%
<b>Total Net Emissions</b>	<b>447.4</b>	<b>443</b>	<b>440.7</b>	<b>429</b>	<b>424.5</b>	<b>425.1</b>	<b>418.2</b>

<sup>a</sup> Reflects emissions from combustion of fuels plus fugitive emissions.

**Table IV.G-4 (Continued)  
California GHG Inventory  
(million metric tons CO<sub>2</sub>e)**

	2013	2014	2015	2016	2017	2018	2019
<i><sup>b</sup> These categories are listed in the Industrial sector of CARB's GHG Emission Inventory sectors.</i> <i><sup>c</sup> This category is listed in the Electric Power sector of CARB's GHG Emission Inventory sectors.</i> <i><sup>d</sup> Reflects use of updated USEPA models for determining emissions from livestock and fertilizers.</i> Source: California GHG Inventory for 2000–2019—by Category as Defined in the 2008 Climate Change Scoping Plan million metric tons of CO <sub>2</sub> e—(based upon IPCC Second Assessment Report's Global Warming Potentials).							

## (2) Existing Project Site Locations Emissions

The site locations for the TCN Structures (Site Locations) are located within property owned and operated by Metro along freeways and major streets, within the City. The existing static displays to be removed are also located on Metro owned land with limited public access. Mobile source emissions are generated by motor vehicle trips to and from the existing static displays for maintenance and sign change out. Energy source emissions are typically associated with electricity usage. Area source emissions are generated by the use of maintenance equipment and products that contain solvents. Table IV.G-5 below presents an estimate of the existing emissions from the existing static displays to be removed.

**Table IV.G-5  
Existing Project Site Annual GHG Emissions Summary**

Scope	Metric Tons of Carbon Dioxide Equivalent <sup>a</sup> (MTCO <sub>2</sub> e)
Energy	220
Mobile	32
Off Road Equipment	17
Total Emissions	269
_____ <i>Numbers may not add up exactly due to rounding.</i> <sup>a</sup> CO <sub>2</sub> e was calculated using CalEEMod and the results are provided in Section 2.0 of the CalEEMod output file within Appendix C.3 of this Draft EIR. Source: Eyestone Environmental, 2022.	

### 3. Project Impacts

#### a. Thresholds of Significance

##### (1) State CEQA Guidelines Appendix G

In accordance with Appendix G of the State CEQA Guidelines, the 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;***

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

CEQA Guidelines Section 15064.4 provides that a lead agency shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. It also states that the lead agency shall have the discretion to determine, in the context of a particular project, whether to: (1) quantify GHG emissions resulting from a project; and/or (2) rely on a qualitative analysis or performance-based standards. Lead agencies should consider several factors when determining the significance of GHG emissions from a project: the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; whether a project exceeds a significance threshold that the lead agency determines applies to the project; and 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.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and, in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)).<sup>79</sup> It is noted that the CEQA Guidelines were amended in

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<sup>79</sup> See California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action (December 2009)*, pp. 11–13, 16.

response to SB 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact less than significant.

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 would avoid or substantially lessen the cumulative problem within the geographic area of the project.<sup>80</sup> To qualify, such plans or programs 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.<sup>81</sup> 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 plans [and] plans or regulations for the reduction of greenhouse gas emissions."<sup>82</sup> Therefore, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of a less-than-significant impact for GHG emissions if a project complies with adopted programs, plans, policies and/or other regulatory strategies to reduce GHG emissions.

Metro and the City of Los Angeles have not adopted a numeric threshold for the analysis of GHG impacts. As noted above, CEQA Guidelines Section 15064.4(b)(2) allows a lead agency to determine a threshold of significance that applies to the Project, and, accordingly, the threshold of significance applied here is 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. For the Project, the applicable adopted regulatory plan to reduce GHG emissions is SCAG's 2020–2045 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers qualitative consistency with regulations or requirements adopted by AB 32's *2008 Climate Change Scoping Plan* and subsequent updates, Metro's 2019 CAAP and the City of LA's Green New Deal.

## (2) SCAQMD Thresholds

In addition, this analysis evaluates the Project's consistency with the State's 2045 carbon neutrality goals. As discussed above, Executive Order B-55-18 establishes a Statewide goal of carbon neutrality by no later than 2045. A study was prepared to identify

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<sup>80</sup> 14 CCR § 15064(h)(3).

<sup>81</sup> 14 CCR § 15064(h)(3).

<sup>82</sup> 14 CCR § 15064(h)(3).

a path to achieving carbon neutrality and is expected to be used by CARB in development of the 2022 Scoping Plan update.<sup>83</sup> Additional details regarding Project consistency with the State's 2045 carbon neutrality goals are provided in Table IV.G-12 on page IV.G-71 further below.

As discussed above, OPR has noted that lead agencies "should make a good-faith effort to calculate or estimate GHG emissions" from a project.<sup>84</sup> GHG emissions are quantified below, consistent with OPR guidelines.

## b. Methodology

Amendments to CEQA Guidelines Section 15064.4 were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Consistent with existing CEQA practice, Section 15064.4 gives lead agencies the discretion to determine whether to quantify GHGs resulting from a project and/or rely on a qualitative analysis. 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 CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The California Natural Resources Agency has also clarified that the CEQA Guidelines amendments focus on the effects of GHG emissions as cumulative impacts, and, therefore, GHG emissions should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064(h)(3) & 15064.4).<sup>85</sup>

Metro has not adopted a numerical significance threshold for assessing impacts related to GHG emissions or a local climate action plan for reducing GHG emissions. Similarly, the City, SCAQMD, OPR, CARB, CAPCOA, or any other State or regional agency has not adopted a numerical significance threshold for assessing GHG emissions

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<sup>83</sup> OPR Technical Advisory, p. 5.

<sup>84</sup> See generally California Natural Resources Agency, *Final Statement of Reasons for Regulatory Action* (December 2009), pp. 11-13, 14, 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.

<sup>85</sup> See *Protect Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th 1099, 1107 ["[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution."]. Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 99 (upholding use of regulatory agency performance standard).

that is applicable to the Project. In the absence of any adopted quantitative threshold, and in accordance with case law and the CEQA Guidelines, the lead agency has determined that the proposed Project would not have a significant effect on the environment if it is found to be consistent with applicable regulatory plans and policies to reduce GHG emissions, including the emissions-reduction measures discussed within CARB's 2017 Scoping Plan and Metro's CAAP.

This evaluation of consistency with such plans is the sole basis for determining the significance of the Project's GHG-related impacts on the environment. Based on CEQA case law, when no guidance exists, the lead agency may look to and assess general compliance with comparable regulatory schemes.<sup>86</sup>

In evaluating climate change impacts, the OPR recommends consideration of a project's consistency with the State's long-term climate goals or strategies to reduce GHG emissions.<sup>87</sup> The lead agency may also use modeling to estimate GHG emissions from a project.<sup>88</sup> This allows a lead agency to quantify GHG emissions resulting from a project. Here, any quantification is for informational purposes and is not used for a comparative analysis or as a threshold of significance.

In summary, as the lead agency, Metro has determined that a project's significant impact with regard to climate change be evaluated solely on the basis of whether a project is in conflict with the climate change plans and the 2019 CAAP. This approach is aligned with the threshold of significance established by Metro for the Project, which is whether the Project conflicts with applicable plans, policies, regulations, and requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions, as noted above.

For informational purposes only, this Draft EIR also estimates the quantity of GHGs the Project would emit 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. However, this quantification is not a threshold of significance or used for quantitative comparative purposes.

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<sup>86</sup> Office of Planning and Research, *Proposed Updates to the CEQA Guidelines—Final* (Nov 2017).

<sup>87</sup> CEQA Guidelines Section 15064.4.

<sup>88</sup> California Climate Action Registry, *General Reporting Protocol Version 3.1*, January 2009.

## (1) Consistency with Plans

The Project's GHG impacts were evaluated by assessing whether the Project conflicted with applicable Statewide, regional, and local GHG reduction plans and strategies. As discussed previously, the Project was evaluated for conflicts with AB 32's *2008 Climate Change Scoping Plan* and subsequent updates, SCAG's 2020–2045 RTP/SCS, the City of LA's Green New Deal and Metro's 2019 CAAP.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. On a Statewide level, the *2008 Climate Change Scoping Plan* and subsequent updates provide measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020–2045 RTP/SCS contains measures to achieve VMT reductions required under SB 375. The Green New Deal, a Mayoral initiative, includes short-term and long-term aspirations pertaining to climate change. However, the Green New Deal is not an adopted plan or directly applicable to private development projects and therefore, the analysis demonstrates that the Project would not hamper the City in reaching these goals. Metro does not have a programmatic mitigation plan to tier from, such as a Greenhouse Gas Emissions Reduction Plan as recommended in the relevant amendments to the CEQA Guidelines. However, Metro has adopted the 2019 CAAP, which identifies measures and goals to reduce GHG emissions, consistent with AB 32 and SB 375. Thus, if the Project is designed in accordance with these policies and regulations, the Project would result in a less-than-significant impact pursuant to CEQA Guidelines Section 15064.4 because it would be consistent with the overarching State regulations on GHG reduction (e.g., AB 32, SB 32, SB 375).

A consistency analysis is provided below and describes the Project's compliance with, or exceedance of, performance-based standards included in the regulations outlined in the applicable portions of AB 32's *2008 Climate Change Scoping Plan* and subsequent updates, SCAG's 2020–2045 RTP/SCS, the City's Green New Deal and Metro's 2019 CAAP.

## (2) Quantification of Emissions

CEQA Guidelines Section 15064.4(a) states a lead agency shall make a good faith effort, based, to the extent possible, on scientific and factual data, to describe and estimate the amount of GHG emissions resulting from a project. CEQA Guidelines Section 15064.4(c) states a lead agency may use a model or methodology to estimate GHG emissions resulting from the project and that the lead agency has the discretion to select the model or methodology that it considers most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change.

Based upon this guidance, GHG emissions were quantified from the construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod 2020.4.0). Operational emissions include both direct and indirect sources including mobile sources, and electricity use emissions. CalEEMod 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 associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.

In view of the above considerations, the analysis below quantifies the Project's total annual GHG emissions, taking into account the GHG emission reduction measures that would be incorporated into the Project's design. However, given the lack of a formally adopted numerical significance threshold or a formally adopted local plan for reducing GHG emissions applicable to this Project, Metro has determined to assess the significance of the Project's GHG emissions by evaluating the Project's consistency with regulatory schemes, comparable to formally adopted local GHG emission reduction plans, that are designed to reduce GHG emissions by encouraging development located and designed to result in the efficient use of resources. The Project's GHG emissions are quantified and provided to comply with CEQA Guidelines Section 15064.4(a) and to provide evidence that the implementation of the plans, policies and regulations adopted to reduce GHG emissions will result in actual GHG reductions.

### (3) Project GHG Emissions

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.<sup>89</sup> The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."<sup>90</sup> Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the Project. The information provided in

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<sup>89</sup> *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009.*

<sup>90</sup> *USEPA, Greenhouse Gases at EPA, [www.epa.gov/greeningepa/greenhouse-gases-epa](http://www.epa.gov/greeningepa/greenhouse-gases-epa), accessed July 14, 2022.*

this section is consistent with the General Reporting Protocol's reporting requirements. A detailed discussion of the GHG methodology is included in Appendix C.1 of this Draft EIR.

The General Reporting Protocol and the USEPA recommend the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions.<sup>91</sup> They include the following:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- 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 (e.g., energy used to convey, treat, and distribute water and wastewater).<sup>92</sup>

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities.

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.<sup>93</sup> For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, OPR has noted that lead agencies “should 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.”<sup>94</sup> Therefore, direct and indirect emissions have been calculated for the Project and are included in Appendix C.3 of this Draft EIR.

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<sup>91</sup> *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

<sup>92</sup> *CARB, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007.*

<sup>93</sup> *OPR Technical Advisory—CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act Review, June 2008, p. 5.*

<sup>94</sup> *California Air Pollution Control Officers Association, California Emissions Estimator Model, CalEEMod™, [www.aqmd.gov/caleemod/](http://www.aqmd.gov/caleemod/); accessed July 14, 2022.*

A fundamental difficulty 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 planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing “new” GHG emissions. As a result, there is frequently an inability to conclude whether a project’s GHG emissions represent a net global increase, reduction, or no change in GHGs that would exist if a project were not implemented. The analysis of the Project’s GHG emissions is particularly conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

The California Emissions Estimator Model<sup>®</sup> (CalEEMod) 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 associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.<sup>95</sup>

*(a) Construction*

The Project’s construction emissions were calculated using CalEEMod Version 2020.4.0. Details of the modeling assumptions and emission factors are provided in Appendix C.3 of this Draft EIR. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecast based on the construction assumptions included in Appendix C.3 and applying the mobile-source emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove existing static displays, excavate for TCN structure supports, construct and install the new TCN structures and related improvements within the Project Site.

In accordance with SCAQMD’s guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. As impacts from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime project GHG emissions. In addition, GHG

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<sup>95</sup> SCAQMD, *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*, 2008.

emission reduction measures for construction equipment are relatively limited. Therefore, SCAQMD recommended that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.<sup>96</sup> Thus, total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions.

*(b) Operation*

Similar to construction, the SCAQMD-recommended CalEEMod is used to calculate potential direct and indirect GHG emissions, including area sources (architectural coating activities), electricity, and mobile sources. CalEEMod default values for generation/usage rates, GHG emission factors, and GWP values were used in the evaluation of operational GHG emissions from the Project. The TCN Structures are not expected to consume natural gas and therefore, natural gas GHG emissions are expected to be zero.

Emissions of GHGs associated with electricity demand are based on the size of the digital displays, the electrical demand factors for the digital displays, the GHG emission factors for the electricity utility provider, and the GWP values for the GHGs emitted. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for LADWP were selected in CalEEMod. The carbon intensity (lbs/MWh) for electricity generation was calculated for the Project buildout year based on LADWP projections for year 2025 (484 lbs CO<sub>2</sub> per MWh). LADWP's carbon intensity projections also take into account SB 100 and SB 350 RPS requirements for renewable energy.

Mobile source GHG emissions are calculated based on emission factors and an estimate of the Project's trips and annual VMT. During operations, the TCN Structures would not generate routine vehicle trips. In general, mobile source emissions are generated by the increase in motor vehicle trips to and from the Site Locations associated with operation of the Project. However, it was conservatively assumed that two (2) vehicle roundtrips would be required per day for maintenance activities to cover all 56 TCN Structures. Trip distances for maintenance vehicle trips were based on CalEEMod default values. CalEEMod then converts EMFAC emission rates into CalEEMod vehicle emission factors.<sup>97</sup>

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<sup>96</sup> CAPCOA, *California Emissions Estimator Model, Appendix A: Calculation Details for CalEEMod, May 2021*.

<sup>97</sup> *Project design features are based on relevant year 2020 targets established by AB 32 and the current CARB Scoping Plan Update.*

The analysis of Project GHG emissions at buildout also takes into account actions and mandates already approved and expected to be in force by Project buildout (e.g., 2019 Title 24 Standards, Pavley I Standards, full implementation of California's Statewide RPS beyond current levels of renewable energy assumed under SB 350, and the California LCFS).<sup>98</sup> It should be noted that GHG reductions due to LCFS are currently not incorporated into CalEEMod. The CalEEMod model incorporates EMFAC2017 emission factors, which do not take into account the most recent 2017 LCFS updates. As a conservative assumption, GHG emissions reductions resulting from the LCFS updates were not included in the Project's emissions inventory. Also, CalEEMod modeling was performed without applying the SAFE Vehicles Rule Part One, which was repealed in December 2021.

In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project-generated trips as a result of Project such as reduced maintenance trips due to removal of existing static displays would provide a proportional reduction in mobile source GHG emissions. Calculation of Project emissions conservatively did not include actions and mandates that are not in CalEEMod and not already in place but are anticipated to be enforced by Project buildout (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding cap-and-trade were not included in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout because the State is expected to continue to implement a number of policies and programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the State's long-term climate goals.

### **c. Project Design Features**

As discussed above, Metro adopted a Green Construction Policy in August 2011 and is committed to using more sustainable construction equipment and vehicles as well as implementing best practices to reduce harmful diesel emissions from all Metro construction projects performed on Metro properties and in Metro ROWs. From January 2015 onwards, the Green Construction Policy has required all off-road, diesel-powered construction equipment greater than 50 horsepower shall meet Tier 4 off-road emission standards at a minimum. These features would reduce Project GHG emissions by requiring use of more efficient equipment and vehicles in comparison to the average fleet within Southern California.

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<sup>98</sup> SCAG, *Draft Program EIR for the 2020–2045 RTP/SC, Section 3.8, Greenhouses, page 3.8-61, December 2019.*

In addition, the Project would implement a number of measures consistent with the Metro Climate Action and Adaptation Plan which would reduce GHG emissions during operations. Such measures include use of 100 percent renewable energy by Year 2035, use of LED lighting at Metro owned properties, and replace non-revenue vehicles with battery electric vehicles.

## 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 an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHG.***

### (1) Impact Analysis

#### *(a) Project Emissions*

The CEQA Guidelines ask whether the Project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. This Draft EIR estimates the GHG emissions associated with the Project for informational purposes only. As discussed above, these Project GHG emissions are not evaluated against a numeric or quantified threshold of significance.

The Project would result in direct and indirect GHG emissions generated by different types of emissions sources, including:

- Construction: emissions associated with demolition of the existing static displays, excavation of TCN structure supports, installation digital displays and construction-related equipment and vehicular activity;
- Energy source (display operations): emissions associated with energy consumption for lighting;
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Off-Road Equipment source: emissions associated with off-road equipment (e.g., cranes, bucket lifts);

By default, CalEEMod calculates GHG emissions resulting from emergency generators, water usage (treatment and conveyance) and solid waste generation. However, the Project would not include emergency generators. Also, the Project is not expected to use water or generate solid waste on a regular basis. Energy source GHG

emissions typically include both natural gas and electricity. The Project would not consume natural gas on a regular basis. Therefore, Project GHG emissions resulting from natural gas usage, emergency generators, water usage, and solid waste generation are expected to be zero and not included in the emissions inventory. The Project would generate an incremental contribution to and cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operation; phases of the Project is provided below.

*(i) Construction*

Removal of the existing static displays would occur concurrently with the installation of the TCN Structures. Overall, the removal of existing static displays and construction of the TCN Structures is anticipated to commence in 2023 and be completed in 2025. Construction of each TCN Structure would begin with excavation for the steel columns supporting the TCN Structures. Digital display foundations would then excavated, followed by construction, and paving/concrete installation. The Project would install new utility connections from existing public infrastructure to serve the TCN Structures. A maximum of 93 cubic yards of export would be hauled from each TCN Structure location for a total maximum of approximately 5,208 cubic yards of export for all Site Locations. A summary of GHG emissions for construction is presented in Table IV.G-6 on page IV.G-51.

As presented in Table IV.G-6, construction of the Project is estimated to generate a total of 1,041 MTCO<sub>2e</sub>. As recommended by SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine the Project's annual construction emissions that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.<sup>99</sup> This results in annual Project construction emissions of 35 MTCO<sub>2e</sub>.

A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix C.3 of this Draft EIR.

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<sup>99</sup> *A BAU comparison as a threshold of significance, by itself, has also been called into question by the California Supreme Court. See Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming, 62 Cal. 4th 204, 220 (2015). While the court cautioned against relying solely on a single quantitative method to justify a no-significance finding, the court provided guidance on how local agencies may evaluate project-specific GHG emissions that sufficiently satisfies CEQA's demands.*

**Table IV.G-6  
Construction-Related Emissions  
(MTCO<sub>2</sub>e)**

Construction Year	MTCO <sub>2</sub> e <sup>a</sup>
Total	1,041
Amortized Over 30 Years	35
<p><sup>a</sup> CO<sub>2</sub>e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix C.3 of this Draft EIR.</p> <p>Source: Eyestone Environmental, 2022.</p>	

*(ii) Operation*

The Project's GHG emissions are quantified and provided to comply with CEQA Guidelines Section 15064.4(a) and to provide evidence that the implementation of the plans, policies, initiatives and regulations adopted to reduce GHG emissions will result in actual GHG reductions. As discussed previously, this comparison is being done for informational purposes only. Metro does not have or use a numerical threshold for GHG or a methodology that relies on a quantitative analysis. Instead, the Project's GHG emissions are quantified and provided to comply with CEQA Guidelines Section 15064.4(a) and to provide evidence that the implementation of the plans, policies and regulations adopted to reduce GHG emissions will result in actual GHG reductions. Project GHG emissions is presented for informational purposes and not as a threshold of significance.<sup>100</sup>

Electricity Emissions

Electricity emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for LADWP were selected in CalEEMod. The carbon intensity (lbs/MWh) for electricity generation was calculated for the Project buildout year based on LADWP projections; as LADWP projections are not calculated for every year, straight line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year based on Year 2020 and 2035 data.<sup>101</sup>

<sup>100</sup> LADWP, 2016 Power Integrated Resource Plan, December 2016.

<sup>101</sup> CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.

As discussed above, the Project would be subject to the 2019 Title 24 standards, which represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the ZNE goal.”<sup>102</sup> The digital displays to be installed would include use of LED lighting or other energy-efficient lighting technologies, such as dimming controls. While the analysis accounts for current energy efficiency regulations, future and proposed regulations have not been taken into account. Such regulations include future iterations of Title 24, which will further increase energy efficiency and ZNE requirements. In addition, the Project would be consistent with and not conflict with the goals of achieving Carbon Neutrality by 2045, as discussed above.

As shown in Table IV.G-7 on page IV.G-53, Project GHG emissions from electricity usage would result in a total of 505 MTCO<sub>2e</sub> per year. It should be noted that Project GHG emissions from electricity consumption conservatively does not take into account compliance with Metro’s 2019 CAAP which requires use of 100% renewable energy at Metro properties by Year 2035.

#### Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with maintenance vehicles visiting the Site Locations based on the number of daily trips generated and VMT. As discussed above, the Project would not generate trips and VMT on a regular basis during operations. Trips would be limited to two vehicles (roundtrips) per day for maintenance activities to cover all 56 TCN Structures.

As shown in Table IV.G-7, Project GHG emissions from mobile sources would result in a net decrease of 26 MTCO<sub>2e</sub> per year. As discussed previously, as part of TCN Program, a take-down component would be implemented including the removal of at least 110,000 square feet (2 to 1 square footage take-down ratio) of existing static displays. Signage to be removed would include at minimum approximately 200 static displays located within the City. The static displays require monthly trips for maintenance and advertisement change out. Removal of the static displays would also reduce the mobile trips needed for maintenance, resulting in a net decrease in emissions. The Project’s GHG emissions inventory does not take into account future regulations to reduce vehicle GHG emissions. As discussed above, the Project would be consistent with and not conflict with GHG reduction measures to achieve the goals of B-55-18 (Carbon Neutrality by 2045). Such GHG reduction measures discussed above include increased use of LCFS and further electrification of the mobile fleet. Also, Governor Gavin Newsom has issued an

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<sup>102</sup> *State of California, Executive Order N-79-20, September 23, 2020.*

**Table IV.G-7  
Annual Project GHG Emissions Summary (Buildout Year)<sup>a</sup>  
(metric tons of carbon dioxide equivalent [MTCO<sub>2</sub>e])**

Scope	Project with Project Features
Energy <sup>b</sup>	505
Mobile <sup>c</sup>	(26)
Off Road Equipment	0
Construction	35
<b>Total Emissions</b>	<b>514</b>

Numbers may not add up exactly due to rounding.

<sup>a</sup> CO<sub>2</sub>e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix C.3 of this Draft EIR. Totals may not add up due to rounding.

<sup>b</sup> Energy source emissions are based on electricity usage rates provided by the Project applicant. Emissions from electricity generation only take into account carbon intensity at build out year and do not take into account decreasing carbon intensity in subsequent years required by SB 100 (RPS). However, it is recognized that the RPS would require utilities to supply 100% renewable energy by 2045. In addition, the electricity emissions above does not take into account compliance with the Metro Climate Action and Adaptation Plan which requires that Metro properties use 100% renewable energy by Year 2035.

<sup>c</sup> Emissions were calculated with CalEEMod which includes EMFAC2017 emission factors. EMFAC2017 does not take account for further reductions in GHG emission as the result of implementation of LCFS amendments. Mobile source emissions also do not account for increasing fuel economy standards for future years.

Source: Eyestone Environmental, 2022.

executive order to require all new passenger cars and trucks sold to be zero-emission vehicles by 2035.<sup>103</sup> Nonetheless, the Project would comply with and support the goals of achieving Carbon Neutrality by 2045, as well as the GHG emission reduction goals in AB 32 and SB 32.

### Off-Road Equipment Source Emissions

Emissions related to off-road equipment sources were calculated using the CalEEMod emissions inventory model. It is anticipated that the Project would include a crane onsite, which will be used for maintenance and repair of the digital displays. As shown in Table IV.G-7, the Project is expected to result in less than one MTCO<sub>2</sub>e per year from off-road equipment sources.

<sup>103</sup> State of California, Executive Order N-79-20, September 23, 2020.

(iii) *Combined Construction and Operational Impacts*

As shown in Table IV.G-7 on page IV.G-53, when taking into consideration implementation of the Metro 2019 CAAP GHG reduction measures, as well as the applicable requirements set forth in Metro's Green Construction Policy and the City of Los Angeles Green Building Code, and full implementation of current State mandates, the Project's GHG emissions for the Project in 2025 would equal 35 MTCO<sub>2e</sub> per year (amortized over 30 years) during construction and 479 MTCO<sub>2e</sub> per year during operation of the Project with a combined total of approximately 514 MTCO<sub>2e</sub> per year.

As discussed above, the Project's GHG emissions inventory was presented for informational purposes only. The Project's GHG emissions inventory does not take into account future regulations and legislation to reduce GHG emissions to achieve the goals of B-55-18. Nonetheless, as described above, the Project would support and not conflict with GHG reduction measures in Executive Order B-55-18, AB 32 and SB 32 to achieve Carbon Neutrality by 2045.

(b) *Applicable Plans and Policies*

As discussed above under Subsection 3.a.(1) on page IV.G-39, compliance with applicable GHG emissions reduction plans would result in a less-than-significant Project and cumulative impact. The following section describes how the Project complies with or exceeds the performance-based standards included in the regulations outlined in the *2008 Climate Change Scoping Plan* and subsequent updates, SCAG's 2020–2045 RTP/SCS, Metro's 2019 CAAP, and the City's Green New Deal. As shown herein, the Project would not be in conflict with and, therefore, would be consistent with the applicable GHG reduction plans and policies.

(i) *Climate Change Scoping Plan*

As discussed above and as shown in Table IV.G-7, the Project would result in 514 MTCO<sub>2e</sub> annually.

AB 32's *2008 Climate Change Scoping Plan* and subsequent updates have a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. Beyond the plan-level goals and actions in the *2008 Climate Change Scoping Plan* and subsequent updates, local governments can also support climate action when considering discretionary approvals and entitlements of individual projects through CEQA. Absent conformity with an adequate geographically-specific GHG reduction plan, CARB recommends that projects incorporate design features and GHG reduction measures, to the degree feasible, to minimize GHG emissions. The following discussion

demonstrates how the Project's consistency with pertinent reduction actions in the *2008 Climate Change Scoping Plan* and subsequent updates reduce Project-related GHG emissions.

Provided in Table IV.G-8 on page IV.G-56 is an evaluation of applicable mandatory regulatory compliance reduction actions/strategies outlined in the *2008 Climate Change Scoping Plan* and subsequent updates that through implementation would serve to reduce Project's direct and indirect GHG emissions. Further evaluation of Project Design Features and specific applicable policies and measures in the *2008 Climate Change Scoping Plan* and subsequent updates is provided in Table IV.G-9 on page IV.G-58. As detailed therein, the Project would be consistent with and not conflict with the *2008 Climate Change Scoping Plan* and subsequent updates, which are intended to reduce GHG emissions.

**Therefore, the Project would not conflict with and, thus, would be consistent with the GHG reduction-related actions and strategies in AB 32's 2008 Climate Change Scoping Plan and subsequent updates, and impacts would be less than significant.**

*(ii) 2020–2045 RTP/SCS*

The purpose of SB 375 is to implement the State's GHG emissions reduction goals by integrating land use planning with the goal of reducing car and light-duty truck travel. Under SB 375, the primary goal of the 2020–2045 RTP/SCS is to provide a framework for future growth that will decrease per capita GHG emissions from cars and light-duty trucks based on land use planning and transportation options. To accomplish this goal, the 2020–2045 RTP/SCS identifies various strategies to reduce per capita VMT, such as encouraging development of infill sites, compact development near transit, and measures that increase vehicle efficiency or use of zero and low emission vehicles. The 2020–2045 RTP/SCS is expected to help SCAG reach its GHG reduction goals, as identified by CARB, with reductions in per capita passenger vehicle GHG emissions for specified target years.

In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020–2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020–2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual Projects, strategies and policies set forth in the 2020–2045 RTP/SCS can be grouped into the following three categories: (1) reduction of vehicle trips and VMT; (2) increased use of alternative fuel

**Table IV.G-8**  
**Regulatory Compliance Measures within the 2008 Climate Change Scoping Plan and Subsequent Updates**

<b>Regulatory Compliance Measures</b>
<p><b>Energy</b></p> <p><b>RPS Program and SB 2X:</b> The California RPS program (updated under SB 2X) requires both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. SB 350 further requires 50-percent renewables by 2030.<sup>a</sup> In 2020, LADWP indicated that 36.7 percent of its electricity came from renewable resources in Year 2020.<sup>b</sup> The CalEEMod default carbon intensity for electricity generated by LADWP (pounds of CO<sub>2</sub>e per MWh) is based on a year 2007 renewables portfolio and was, therefore, updated within CalEEMod to reflect the year 2025 renewables portfolio. It is noted that under the recently passed SB 100, LADWP is required to generate electricity that would increase renewable energy resources to 50 percent by 2026, 60 percent by 2030, and 100 percent by 2045. The Project would support these renewable requirements because the Project is served by LADWP.</p> <p>The electricity-related GHG emissions provided in Table IV.G-7 on page IV.G-53 conservatively do not account for the additional 50-percent reduction that would be achieved by LADWP in year 2045 (difference between the 50-percent renewables assumed for the buildout year of 2025 and 100-percent required under SB 2X in year 2045).</p> <p><b>SB 350:</b> As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 (discussed below) and utility-sponsored programs, such as rebates for high-efficiency appliances, HVAC systems, and insulation. The Project would further support this regulation since Metro's CAAP would require the Project to implement measures to reduce overall energy usage compared to baseline conditions.</p>
<p><b>Cap-and-Trade Program:</b> As required by AB 32 and the <i>Climate Change Scoping Plan</i>, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-State or imported. Accordingly, this regulatory program applies to electric service providers and not directly to land use development. The declining limit on covered sources of GHG emissions creates a powerful economic incentive for significant investment in cleaner, more efficient technologies. That being said, the Project would benefit from this regulatory program in that the GHG emissions associated with the Project's electricity usage per year presented in Table IV.G-7 on page IV.G-53 would indirectly be covered by the Cap-and-Trade Program.</p>
<p><b>Mobile</b></p> <p><b>Advanced Clean Cars Program:</b> CARB approved the Advanced Clean Cars Program in 2012, which establishes an emissions control program for model year 2017 through 2025 and increasing the number of zero emission vehicles manufactured in the 2018 through 2025 model years, which would reduce GHG emissions by 34 percent in comparison to the 2012 model year vehicles. Standards under the Advanced Clean Cars Program apply to all passenger and light duty trucks within California and indirectly used by employees maintaining the Site Locations.</p> <p>The 2008 Climate Change Scoping Plan recommends additional mobile source strategies through the extension of the Advanced Clean Cars Program, which are expected to increase GHG stringency on light duty autos and continue adding zero emission and plug-in vehicles through 2030. CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses, such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.<sup>c,d</sup> Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Project would also indirectly benefit from these measures once adopted. Vehicles and trucks and travelling to the site for maintenance purposes would be subject to any regulations to reduce GHG emissions from mobile sources. However, the Project's GHG emissions inventory conservatively does not account for GHG emissions reductions due to these measures.</p>

**Table IV.G-8 (Continued)**  
**Regulatory Compliance Measures within the 2008 Climate Change Scoping Plan and Subsequent Updates**

<b>Regulatory Compliance Measures</b>
<p><b>Low Carbon Fuel Standard (LCFS):</b> The current LCFS requires a reduction of at least 7.5 percent in the carbon intensity (CI) of California’s transportation fuels by 2020. CalEEMod includes implementation of LCFS into the calculation of GHG emissions from mobile sources. However, the LCFS was amended in September 2018 to target a 20-percent reduction in CI from a 2010 baseline by 2030.<sup>e</sup> As discussed previously, the CalEEMod model does not take into account the more recent updates to LCFS. The Project’s emissions inventory conservatively does not take credit for additional GHG reductions due to the more recent LCFS requirements, but this additional 10-percent reduction in CI would indirectly reduce the Project’s mobile source emissions associated with maintenance activities.</p>
<hr/> <p><sup>a</sup> <i>SB 350 (2015–2016 Regular Session) Stats 2015, Ch. 547.</i></p> <p><sup>b</sup> <i>LADWP, 2020 Power Content Label, October 2020.</i></p> <p><sup>c</sup> <i>CARB, Advance Clean Cars, 2017 Midterm Review Report, ww2.arb.ca.gov/resources/documents/2017-midterm-review-report, accessed July 14, 2022.</i></p> <p><sup>d</sup> <i>CARB, Advanced Clean Local Trucks (Last mile delivery and local trucks), ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks, accessed July 14, 2022.</i></p> <p><sup>e</sup> <i>CARB, LCFS Regulation, ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/lcfs-regulation, accessed July 14, 2022.</i></p> <p><i>Source: Eyestone Environmental, 2022.</i></p>

vehicles; and (3) improved energy efficiency.<sup>104</sup> These strategies and policies are addressed below. Also, as explained immediately below, the Project is consistent with applicable growth forecasts.

### Integrated Growth Forecast

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG’s Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. As discussed in the Project’s Initial Study included as Appendix A of this Draft EIR, development of the Project would not include uses that would generate residential population or employment growth. Thus, the Project’s would not conflict with growth forecasts in the 2020-2045 RTP/SCS. Refer to Section IV.J, Land Use and Planning, of this Draft EIR, for additional information regarding consistency with the 2020–2045 RTP/SCS.

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<sup>104</sup> *As discussed above, SB 375 legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32.*

**Table IV.G-9  
Consistency Analysis—2008 Climate Change Scoping Plan and Subsequent Updates**

<b>Actions and Strategies</b>	<b>Responsible Party(ies)</b>	<b>Would the Project Conflict?</b>
<p><b>California Code of Regulations (CCR), Title 20:</b> The 2016 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.</p>	<p>State and CEC</p>	<p><b>No Conflict.</b> These standards are included in default parameters provided in Table IV.G-7 on page IV.G-53. As detailed therein, the Project would not conflict with and, thus, would be consistent with CCR, Title 20.</p>
<p><b>CCR, Title 24, Building Standards Code:</b> The 2019 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.<sup>a</sup></p> <p>The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation (e.g., new residential and non-residential buildings shall demonstrate a 20-percent overall water use reduction), material conservation, and internal air contaminants.</p>	<p>State and CEC</p>	<p><b>Consistent.</b> Consistent with regulatory requirements, the Project shall comply with applicable provisions of Metro’s Green Construction Policy and the 2023 Los Angeles Green Building Code that in turn require compliance with mandatory standards included in the CALGreen Code. The 2022 Title 24 standards represent “challenging but achievable design and construction practices” and, as discussed above, are substantially more stringent than the 2019 Title 24 standards. Therefore, the Project would not conflict with CCR Title 24 requirements. and, thus, would be consistent with CCR Title 24.</p>
<p><b>Senate Bill (SB) 375:</b> SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.</p>	<p>State, CARB Regional, SCAG</p>	<p><b>No Conflict.</b> SB 375 requires SCAG to direct the development of the SCS for the region. The Project would not generate trips or VMT on a regular basis during operations. In addition, the signs would relay traffic information to the public such as traffic congestion events and provide travel alternatives to maximum efficiency of the congested road network. Further, the TCN Structures would provide off-site advertising that would direct funds to new and expanded transportation programs including the potential to fund GHG reduction measures such as bus electrification programs and programs to further improve the experience for bus passengers. While these actions may not directly reduce VMT, the increase in efficiency of the roadway</p>

**Table IV.G-9 (Continued)**  
**Consistency Analysis—2008 Climate Change Scoping Plan and Subsequent Updates**

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
		would reduce travel and delay times throughout the region. Therefore, the Project would not conflict with and, thus, would be consistent with SB 375, the reduction in passenger vehicle GHG emissions per capita goals provided in the 2020–2045 RTP/SCS.
<p><b>By 2019, adjust performance measures used to select and design transportation facilities.</b></p> <p>Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).</p>	<p>CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, CTC, Caltrans</p>	<p>No Conflict. The Project would not involve construction of transportation facilities. The Project would include signage which would increase efficiency of the roadway network. Therefore, the Project would not conflict and, thus, be consistent with this strategy of the Scoping Plan.</p>
<p><b>By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).</b></p>	<p>CalSTA, Caltrans, CTC, OPR/SGC, CARB</p>	<p><b>Not Applicable.</b> The Project would not generate vehicle trips or VMT on a regular basis. Therefore, this measure is not applicable to the Project.</p>
<p><b>CCR, Title 24, Building Standards Code:</b> The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.</p>	<p>State</p>	<p><b>No Conflict.</b> The Project would comply with applicable provisions of Metro’s Green Construction Policy and the 2023 Los Angeles Green Building Code which in turn requires compliance with mandatory standards included in the California Green Building Standards mainly with regard to lighting and signage requirements. However, the TCN Structures are not expected to use water during operations. Therefore, the Project would not conflict with and, thus, would be consistent with CCR, Title 24.</p>
<p><b>Million Solar Roofs Program:</b> The program is implemented through SB 1 (Murray, 2006), which provides up to \$3.3 billion in financial incentives for the installation of residential, commercial and institutional solar PV programs.</p>	<p>State</p>	<p><b>Not Applicable.</b> The Project would not contain habitable structures with roofs. Further, given the limited footprint and design of the TCN Structure, solar would not be feasible as part of the Project. Therefore, this measure is not applicable to the Project.</p>

**Table IV.G-9 (Continued)  
Consistency Analysis—2008 Climate Change Scoping Plan and Subsequent Updates**

<b>Actions and Strategies</b>	<b>Responsible Party(ies)</b>	<b>Would the Project Conflict?</b>
<p><b>Senate Bill X7-7:</b> The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This is an implementing measure of the Water Sector of the AB 32 2008 Climate Change Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.</p>	<p>State</p>	<p><b>Not Applicable.</b> As discussed above, the Project would not use water on a regular basis during operations. Therefore, this measure is not applicable to the Project.</p>
<p><b>Implement the Short-Lived Climate Pollutant Strategy by 2030:</b> 40-percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. 50-percent reduction in black carbon emissions below 2013 levels.</p>	<p>CARB, CalRecycle, CDFA, SWRCB, Local air districts</p>	<p><b>Not Applicable.</b> SB 605 was adopted in 2014 which directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. SB 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.<sup>b</sup> SB 1383 requires various agencies including CARB, California Department of Food and Agriculture (CDFA), the State Water Resources Board (SWRCB) to be responsible for adopting regulations to reduce GHG emissions. These regulations would not be applicable to the Project as the Project would not generate solid waste on a regular basis. Therefore, the Project would not conflict with and, thus, would be consistent with the CARB SLCP Reduction Strategy which limits the use of hydrofluorocarbons for refrigeration uses.</p>
<p><b>By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.</b></p>	<p>CARB, CalRecycle, CDFA, SWRCB, Local air districts</p>	<p><b>No Conflict.</b> Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50-percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. The SB 1383 regulations go into effect January 1, 2022.<sup>c</sup>  The Project would not conflict with and, thus, would be consistent</p>

**Table IV.G-9 (Continued)  
Consistency Analysis—2008 Climate Change Scoping Plan and Subsequent Updates**

Actions and Strategies	Responsible Party(ies)	Would the Project Conflict?
		<p>with AB 341, which requires not less than 75 percent of solid waste generated be source reduced through recycling, composting or diversion. The Project would not generate solid waste on a regular basis during operations. However, any solid waste generated by the Project will be handled by the City of Los Angeles Sanitation Department which currently complies with AB 341. Compliance with AB 341 would also help achieve the goals of SB 1383.</p>
<p>_____</p> <p><i>CalRecycle = California Department of Resources Recycling and Recovery</i>  <i>CalSTA = California State Transportation Agency</i>  <i>Caltrans = California Department of Transportation</i>  <i>CARB = California Air Resources Board</i>  <i>CDFA = California Department of Food and Agriculture</i>  <i>CTC = California Transportation Commission</i>  <i>DOF = California Department of Finance</i>  <i>GoBiz = Governor’s Office of Business and Economic Development</i>  <i>SCAG = Southern California Association of Governments</i>  <i>SGC = Strategic Growth Council</i>  <i>SWRCB = State Water Resources Control Board</i></p> <p><sup>a</sup> CEC, Adoption Hearing, 2019 Building Energy Efficiency Standards.  <sup>b</sup> CARB, Reducing Short-Lived Climate Pollutants in California, <a href="http://ww2.arb.ca.gov/our-work/programs/slcp">ww2.arb.ca.gov/our-work/programs/slcp</a>, accessed July 14, 2022.  <sup>c</sup> CalRecycle, Short-Lived Climate Pollutants (SLCP): Organic Waste Methane Emissions Reductions, <a href="http://www.calrecycle.ca.gov/climate/slcp/">www.calrecycle.ca.gov/climate/slcp/</a>, accessed July 14, 2022.</p> <p>Source: Eyestone Environmental, 2022.</p>		

### VMT Reduction Strategies and Policies

As discussed above, Metro is basing its determination of the significance of the Project's GHG emissions solely in relation to the Project not being in conflict with, and, therefore, being consistent with State, regional, and local regulatory schemes and policies adopted to reduce GHG emissions. As discussed above, the Project would not generate trips or VMT on a regular basis. While the Project would not directly reduce VMT, features such as providing real-time traffic data and alternative routes would help improve traffic flow and reduce vehicle delay time. The Project through advertising revenue would indirectly fund transit improvements that will help to achieve VMT reduction strategies. These measures would further promote a reduction in VMT and subsequent reduction in GHG emissions, which would not be in conflict and, therefore, would be consistent with the goals of SCAG's 2020–2045 RTP/SCS.

### Increased Use of Alternative Fueled Vehicles Policy Initiative

The second goal of the 2020–2045 RTP/SCS, with regard to individual projects, such as the Project, is to increase alternative fueled vehicles to reduce per capita GHG emissions. The 2020–2045 RTP/SCS policy initiative focuses on providing charge port infrastructure and accelerating fleet conversion to electric or other near zero-emission technologies. The Project would not generate trips or VMT on a regular basis during operations. However, the Project may provide messaging to the public promoting the use of alternative fueled or electric vehicles including the locations of charge port infrastructure. While the TCN Structures would not install EV charging infrastructure, the Project would not conflict with the 2020-2045 RTP/SCS with regards to electric vehicle technology.

### Energy Efficiency Strategies and Policies

The third important goal within the 2020–2045 RTP/SCS for individual projects, such as the Project, involves improving energy efficiency (e.g., reducing energy consumption) to reduce GHG emissions. The 2020–2045 RTP/SCS goal is to actively encourage and create incentives for energy efficiency, where possible. As discussed in Section II, Project Description, of this Draft EIR, the Project has been designed and would be constructed to incorporate environmentally sustainable structure features and applicable construction protocols required by Metro's Green Construction Policy, the Los Angeles Green Building Code and the CALGreen Code. These standards would reduce energy usage and, thereby, reduce associated GHG emissions and help minimize the impact on natural resources and infrastructure.

The signage on the TCN Structures would be required to comply with the 2022 Title 24 energy efficiency standards specific to outdoor lighting. In addition, the Project would remove existing static displays which may use older inefficient lighting and replace it with digital displays using LED lighting.

### Land Use Assumptions

At the regional level, the 2020–2045 RTP/SCS is a plan adopted for the purpose of reducing GHG emissions. In order to assess the Project’s consistency with the 2020–2045 RTP/SCS, this Draft EIR also analyzes the Project’s land use characteristics for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable local and regional land use plans and regulations, such as the 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. The Project’s consistency with the applicable goals set forth in the 2020–2045 RTP/SCS is discussed in Section IV.I, Land Use and Planning, of this Draft EIR and detailed in Table 3 of Appendix I to this Draft EIR. As shown in Table 3 of Appendix I, the Project is consistent with the land use goals and principles set forth in the 2020–2045 RTP/SCS that pertain to GHG emissions.

In sum, the Project would not conflict with the goals of 2020-2045 RTP/SCS regarding VMT and would expand multi-modal transportation in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State’s long-term climate policies.<sup>105</sup> By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State regulatory requirements.

**Therefore, the Project would not conflict with and, thus, would be consistent with the GHG reduction-related actions and strategies contained in the 2020–2045 RTP/SCS. As such, impacts related to consistency with the 2020–2045 RTP/SCS would be less than significant.**

#### *(iii) Metro’s 2019 Climate Action and Adaptation Plan*

The 2012 CAAP was updated in 2019 to describe Metro’s commitment to help address the impacts of climate change and build climate resilience. The 2019 CAAP identifies 13 measures to reduce GHG emissions by 79 percent by 2030 and 100 percent

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<sup>105</sup> *Energy and Environmental Economics (E3). “Deep Decarbonization in a High Renewables Future, Updated Results from the California PATHWAYS Model” (June 2018) Mahone, Amber. The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state’s goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed long-term 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. The model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.*

by 2050 (from 2017 levels). The 2019 CAAP analyzed strategies and measures that reduce emissions from every aspect of Metro's operations. Such strategies and measures target regional transportation emissions, promote battery vehicle technology, biomethane for transportation use, bus electrification, and other fleet improvements. The analysis calculates emissions reductions resulting from implementation of these GHG reduction measures and strategies. The 2019 CAAP also assessed existing legislation and guidance from local, regional, state, and federal entities and completed an inventory of all new and/or existing emission-reducing projects. In total, full implementation of the 2019 CAAP would help Metro avoid more than 416,000 metric tons of annual carbon dioxide emissions by 2050, or the equivalent of the annual emissions of more than 88,000 passenger vehicles (Metro 2019). The proposed Project's consistency analysis with the 13 measures found in the 2019 CAAP is discussed Table IV.G-10 on page IV.G-65. **The Project would be consistent with the applicable 2019 CAAP measures and would help Metro achieve its GHG-reduction goals of 79 percent by 2030 and 100 percent by 2050 from 2017 levels. Thus, the Project's impacts would be less than significant.**

*(iii) City of Los Angeles Sustainable City pLAN/City's Green New Deal*

As discussed above, L.A.'s Green New Deal, a mayoral initiative, includes both short-term and long-term aspirations through the year 2050 in various topic areas, including water, renewable energy, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. While not an initiative adopted solely to reduce GHG emissions, within the Green New Deal, climate change mitigation is one of eight explicit benefits that help define its strategies and goals.

The Sustainable City pLAN/L.A.'s Green New Deal provides information as to what the City will do with buildings and infrastructure in its control and provides specific targets related to housing and development, as well as mobility and transit, including the reduction of VMT per capita by 13 percent by 2025, at least a 39 percent VMT per capita reduction by 2035. As noted above, the Sustainable City pLAN was updated in April 2019 and renamed as L.A.'s Green New Deal, which has established targets, such as 100-percent renewable energy by 2045, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035. L.A.'s Green New Deal mainly targets GHG emissions related to City-owned buildings and operations (e.g., City operated utilities) and do not directly apply to new private development, however discussion should be on whether the project conflicts or will hamper the City in achieving the goals of the Green New Deal and whether the project will benefit from the City achieving these objectives. Table IV.G-11 on page IV.G-67 provides a discussion of whether the Project would conflict with or hinder the City's efforts in reaching the goals in L.A.'s Green New Deal. As discussed therein, the Project would include increasing renewable energy usage and would not conflict with or hinder the City's efforts in reaching the goals in L.A.'s Green New Deal.

**Table IV.G-10**  
**Consistency with the 2019 Metro Climate Action and Adaption Plan**

<b>Final Mitigation Measures by General Sector</b>	<b>Consistency Analysis</b>
V-1: Replace all directly operated buses with Battery Electric Buses (BEBs).	<b>Not Applicable.</b> The Project involves installation of digital displays for a TCN and would not change the current bus operations of Metro. However, the TCN Structures would provide off site advertising that would direct funds to new and expanded transportation programs including the potential to fund bus electrification programs and further improve the experience for bus passengers. Thus, the Project would not conflict with this CAAP Measure.
V-2: Replace all contracted buses with renewable natural gas (RNG) buses and BEBs.	<b>Not Applicable.</b> The Project involves installations of digital displays for a TCN and would not change the current bus operations of Metro. However, the TCN Structures would provide off site advertising that would direct funds to new and expanded transportation programs including the potential to fund bus electrification programs and further improve the experience for bus passengers. Thus, the Project would not conflict with this CAAP Measure.
V-3: Replace vanpool vehicles with Battery Electric Vehicles (BEVs).	<b>Not Applicable.</b> The Project would involve limited operational maintenance trips and vanpool vehicles are not expected to be used for maintenance activities. Thus, the Project would not conflict with this CAAP Measure.
V-4: Replace non-revenue vehicles with BEVs.	<b>Not Applicable.</b> The Project would involve limited operational maintenance trips. Maintenance trips would be conducted by a third party contractor. Non-revenue Metro vehicles would not be used for maintenance purposes. Thus, the Project would not conflict with this CAAP Measure.
V-5: Install Wayside Energy Storage Substation (WESS) to store energy from decelerating railcars.	<b>Not Applicable.</b> The Project would not involve any railcars and, thus, would not conflict with this measure.
E-1: Expand use of renewable energy in electricity procurement (100 percent renewable electricity by 2035).	<b>Consistent.</b> The Project's largest source of GHG emissions is from electrical demand; refer to Table IV.G-7 on page IV.G-53. As required under this measure, the Project would use 100-percent renewable energy by 2035, thus removing all of the electrical GHG emission shown in Table IV.G-7 by 2035.
F-1: Increase onsite solar photovoltaic installations.	<b>Not Applicable.</b> The Project would not include a land use where onsite solar photovoltaic solar panels could be installed. Further, given the limited footprint and design of the TCN Structure, solar would not be feasible as part of the Project. Thus, the proposed Project would not conflict with this measure.
F-2: Install new designs or retrofits of low-water sanitary fixtures that require less water and energy.	<b>Not Applicable.</b> The Project would not include any land uses that would require water sanitary fixtures. Thus, the proposed Project would not conflict with this measure.
F-3: Install non-potable recycle water systems.	<b>Not Applicable.</b> The Project would not include any land uses that would require non-potable recycle water systems. Thus, the Project would not conflict with this measure.
F-4: Replace lighting fixtures with LED lights.	<b>Consistent.</b> The Project would install energy-efficient LED lights in all the lighting fixtures used in the Project.
F-5: Replace existing appliances with more efficient electric	<b>Not Applicable.</b> The Project would not replace a land use with existing appliances. The Project would not conflict with this measure.

**Table IV.G-10 (Continued)**  
**Consistency with the 2019 Metro Climate Action and Adaption Plan**

Final Mitigation Measures by General Sector	Consistency Analysis
appliances (compressors, water heaters, kitchen appliances).	
F-6: Replace existing HVAC systems with electric systems.	<b>Not Applicable.</b> The Project would not replace an existing land use with HVAC systems. The Project would not conflict with this measure.
C-1: Install EV charging infrastructure at Metro facilities for employee commuter use.	<b>Not Applicable.</b> The Project would not include land uses where EV charging infrastructure could be built. The Project would not conflict with this measure.
<p>Source: Eyestone Environmental, 2022. California Air Resources Board. <i>Achieving Carbon Neutrality in California</i>. October 2020</p>	

Although L.A.'s Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would generally not conflict with or hinder these aspirations because it does not generate trips and would help improve roadway efficiency by providing motorists with real-time traffic information. Furthermore, the Project would comply with the CALGreen Code and Title 24 pertaining to lighting and signage energy usage. **Therefore, the Project would not be in conflict with and would, therefore, be consistent with the goals of L.A.'s Green New Deal.**

*(iv) Post-2030 Analysis*

Studies show that the State's existing and proposed regulatory framework will put the State on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.<sup>106</sup> Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the Statewide emissions 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.

<sup>106</sup> CARB, *Climate Change Scoping Plan: A Framework for Change*, December 2008., p. 117.

**Table IV.G-11  
Consistency with Applicable GHG Emissions Goals and Actions of the City’s Green New Deal**

Action	Description	Would the Project Conflict?
<b>Focus Area: Local Water</b>		
Reduce potable water use per capita by 22.5% by 2025; and 25% by 2035; and maintain or reduce 2035 per capita water use through 2050	The City would build upon the success of the Save the Drop program and develop additional water conservation campaigns. In addition, the City would continue to benchmark customer use and improve data gathering to identify effective programs	<b>Not Applicable.</b> The Project would not use water on a regular basis during operations. Therefore, the Project would not conflict with this goal of the City’s Green New Deal.
<b>Focus Area: Clean and Healthy Buildings</b>		
All new buildings will be net zero carbon by 2030; and 100% of buildings will be net zero carbon by 2050	The City would perform a complete building electrification study and develop supporting programs. Financing would be expanded and improved to provide electrification existing energy efficiency and solar programs.	<b>Not Applicable.</b> While it is the City’s responsibility to adopt plans and regulations that support this action, the Project would be designed and operated to meet or exceed the applicable requirements of the CALGreen Code and the City of Los Angeles Green Building Code. Furthermore, the Project would be subject to the 2022 Title 24 Standards, which represent “challenging but achievable design and construction practices” that represent “a major step towards meeting the Zero Net Energy (ZNE) goal. <sup>a</sup> Therefore, the Project would not conflict with this goal of the City’s Green New Deal.
Reduce building energy use per sf for all building types 22% by 2025; 34% by 2035; and 44% by 2050	The City would increase awareness of incentives and smart building energy management systems. An energy consumption report will be prepared to assess the energy-water nexus.	<b>No Conflict.</b> This action applies to the City. However, the Project would be designed and operated to meet the applicable requirements of the CALGreen Code, Title 24 and the City of Los Angeles Green Building Code. Therefore, the Project would not conflict with the City in achieving this goal of the City’s Green New Deal.
<b>Focus Area: Mobility and Public Transit</b>		
Reduce VMT per capita by at least 13% by 2025; 39% by 2035; and 45% by 2050	The City would update the Transportation Demand Management (TDM) ordinance and develop first/last mile infrastructure improvements around transit stations. TDM strategies would also be implemented consistent with the West Side Mobility Plan to ease congestion.	<b>Not Applicable.</b> The Project would not generate vehicle trips or VMT on a regular basis during operations. In addition, the signs would relay traffic information to the public such as traffic congestion events and provide travel alternatives to maximum efficiency of the congested road network. While these actions may not directly reduce VMT, the increase in efficiency of the roadway would reduce travel and delay times throughout the region.  Therefore, the Project would not conflict with this goal of the City’s Green New Deal.
<b>Focus Area: Mobility and Public Transit</b>		

**Table IV.G-11 (Continued)**  
**Consistency with Applicable GHG Emissions Goals and Actions of the City’s Green New Deal**

Action	Description	Would the Project Conflict?
Increase the percentage of electric and zero emission vehicles in the city to 25% by 2025; 80% by 2035; and 100% by 2050	The City would increase the electric vehicle ownership by providing rebates for used EVs and chargers, as well as promote trade-in events for electric vehicles. The City would also increase the number of EV charging stations by pursuing public-private partnerships in developing charging stations, streamline permitting processes for EV charger installations and update building codes to simplify EV charging requirements.	<b>No Conflict.</b> The Project would not generate vehicle trips or VMT on a regular basis during operations. However, the Project may provide messaging to the public promoting use of alternative fueled or electric vehicles. Therefore, the Project would not conflict with the City in achieving this goal of the City’s Green New Deal.
<hr/> <p><sup>a</sup> CEC, 2019 Building Energy Efficiency Standards, Fact Sheet.                      Source: Eyestone Environmental, 2022.</p>		

Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require CARB to ensure that Statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. These targets would build upon those originally established under AB 32, which required reducing Statewide GHG emissions to 1990 levels by 2020. As discussed above, 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. As discussed above, the Project would not include uses that generate vehicle trips on a regular basis. Energy usage related to signage and lighting would be required to comply with Title 24 requirements.

The emissions modeling in the 2017 Update to the Scoping Plan has projected 2030 Statewide emissions, which take into account known commitments (reduction measures), such as SB 375, SB 350, and other measures. The emissions inventory identified an emissions gap, meaning that emissions reductions due to known commitments do not decline fast enough to achieve the 2030 target. In order to fill this gap, the 2017 Update to the Scoping Plan assumed a scenario in which cap-and-trade would deliver the reductions necessary to achieve the 2030 emissions target. Although the Project is consistent with the 2017 Update to the Scoping Plan, additional measures to achieve the 2030 targets and beyond are outside the Project’s control. While any evaluation of post-2030 Project emissions would be speculative, the Project would not preclude or impede the State achieving the 2030 targets.

Executive Order S-3-05 establishes a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. This goal, however, has not been codified. That being said, studies have shown that, in order to meet the 2050 target, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its 2008 Climate Change Scoping Plan, CARB acknowledged that the “measures needed to meet the 2050 are too far in the future to define in detail.”<sup>107</sup> In the First Update to the Scoping Plan in 2014, however, 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.”<sup>108</sup>

Although the Project’s emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State’s achievement of that goal and it is reasonable to expect the Project’s emissions to decline as the regulatory initiatives identified by CARB in the Climate Change Scoping Plan are implemented, and other technological innovations occur.<sup>109</sup> Stated differently, the Project’s total emissions at build-out presented in Table IV.G-7 on page IV.G-53 in the analysis below, 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. That inventory takes into account existing regulations and regulations that would apply to the Project at its build out year. Please refer to Table IV.G-7 and Table IV.G-8 on pages IV.G-53 and IV.G-56, respectively, for applicable regulatory measures that would serve to reduce GHG impacts from the Project. As an example, the Project’s GHG emissions associated with electrical usage would be reduced by an additional 22 percent in Year 2030 and to zero in 2050 since the electricity provider (LADWP) servicing the Project Site must generate electricity with 60-percent renewables in 2030 and 100-percent renewables by 2045 (SB 100). As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with and not conflict with the Executive Order’s horizon-year (2050) goal. Further, the Project is consistent with SCAG’s 2020–2045 RTP/SCS, which demonstrates that the region would meet the post-2030 GHG reduction goal of 19 percent by 2035.

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<sup>107</sup> CARB, *2017 Scoping Plan Update*, November 2017, p. 18.

<sup>108</sup> *Such regulatory measures which will further reduce GHG emissions include the RPS under SB 100 which requires 100 percent renewable energy by 2045.*

<sup>109</sup> SCAQMD Governing Board Agenda Item 31, December 5, 2008.

**For the reasons described above, the Project's post-2030 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Orders S-3-05 and B-30-15. Thus, the Project's impacts would be less than significant.**

*(iv) Carbon Neutrality*

As discussed above, Executive Order B-55-18 establishes a new Statewide goal to achieve carbon neutrality no later than 2045 and achieve and maintain net negative emissions thereafter. Based on this executive order, CARB would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress towards this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Also discussed above, CARB has released a study evaluating three scenarios that achieve Carbon Neutrality in California by 2045. The scenarios analyzed to achieve carbon neutrality include a High Carbon Dioxide Removal (CDR) scenario, Zero Carbon Energy scenario, and a Balanced scenario. Under each of these scenarios, CARB proposed reduction strategies for various sectors that contribute GHG emissions throughout the State. Table IV.G-12 on page IV.G-71 provides a summary of key emission reduction strategies required to achieve the 2045 GHG emissions target of Carbon Neutrality. In addition, Table IV.G-12 demonstrates how the Project would be consistent with and not conflict with and, therefore, be consistent with these measures.

Although specific details are not yet available for the GHG reduction measures discussed above, implementation of these measures would require regulations to be enforced by the State. **The Project would be required to comply with regulations in support of the goal of Carbon Neutrality by 2045 and would, therefore, not be in conflict with and, thus, would be consistent with the State's achievement of the goals of Executive Order B55-18. Thus, the Project's impacts would be less than significant.**

*(c) Conclusion*

In summary, the Project's features, and design render it consistent with Statewide, regional, and local climate change mandates, plans, policies, and recommendations. The Project's signage would assist with reducing congestion and delay times of motorists by providing traffic information and alternative routes which would result in a reduction in GHG emissions. Further, the TCN Structures would provide off-site advertising that would direct funds to new and expanded transportation programs including the potential to fund GHG reduction measures such as bus electrification programs which would be consistent with goals of SCAG's 2020-2045 RTP/SCS. More specifically, the plan consistency analysis

**Table IV.G-12  
Project Consistency with 2045 Carbon Neutrality Goals**

<b>Sector</b>	<b>Description</b>	<b>Consistency Analysis</b>
Sector: Low Carbon Fuels	The State would use advanced biofuels for ground transportation, renewable aviation fuel and biomethane for electricity generation. Hydrogen may also be blended into pipeline gas demand as well as hydrogen for fuel cell transportation.	<b>No Conflict.</b> This action primarily applies to the transportation fuel providers. However, the Project would source transportation fuel from these providers that would comply with these reduction measures. As such, the Project would not conflict with and, thus, would be consistent with this goal.
Sector: Buildings	The State would require 100% of sales of electric appliances by 2030 through 2040.	<b>No Conflict.</b> The Project would not include habitable structures or electric appliances. As such, the Project would not conflict with and, thus, would be consistent with this goal.
Sector: Transportation	The State would require 100% Battery Electric Vehicle (BEV) sales for Light Duty Vehicles (LDV) and Medium Duty Vehicles (MDV) as early as 2030. Sales of Heavy Duty Vehicles (HDV) would achieve at least 45% BEV or CNG as early as 2035. At least 50% of rail within the State would be electrified and 50% of in-state aviation be electrified.	<b>No Conflict.</b> The Project would not generate trips or VMT on a regular basis. However, the Project may provide messaging to the public promoting use of alternative fueled or electric vehicles including the locations of charge port infrastructure. Therefore, the Project would not conflict with requirements on sales of BEV or CNG powered vehicles. As such, the Project would not conflict with and, thus, would be consistent with this goal.
Sector: Industry and Agriculture	The State would require industry to be up to 53 percent electrified and up to 19 percent of energy to be met with hydrogen. Cement, glass, oil and gas industries would be required to achieve carbon capture of at least 14 MMT. Agricultural energy emissions would be reduced by at least 80%. Oil and gas extraction and petroleum refining energy demand would be reduced by at least 90%	<b>Not Applicable.</b> The Project would not include industrial or agricultural uses. As such, the Project would not conflict with and, thus, would be consistent with this goal.
Sector: Electricity	Electricity generation within the state is fueled with natural gas, biomethane or hydrogen. At least 95 percent of electricity generation would be zero carbon.	<b>No Conflict.</b> This action primarily applies to the local power utility company (LADWP). However, the Project would source all electricity from the LADWP that would comply with these reduction measures. As such, the Project would not conflict with and thus, would be consistent with this goal.
High GWP and Non-Combustion	Landfill and wastewater methane would be reduced by 23%. Pipeline fugitive emissions would be reduced by 72%, agricultural methane would be reduced by 41% and refrigerants	<b>No Conflict.</b> This action primarily applies to the local water utility (City of LA Sanitation Department) and solid waste utility. The Project would not generate solid waste or use water during

**Table IV.G-12 (Continued)**  
**Project Consistency with 2045 Carbon Neutrality Goals**

Sector	Description	Consistency Analysis
	would be reduced by 75%. Percent reductions are relative to Year 2020.	normal operations. As such, the Project would not conflict with and thus, would be consistent with this goal.
Sector: Carbon Dioxide Removal	At least 33 million metric tons/year of carbon dioxide removal needed in 2045.	<b>Not Applicable.</b> While this action primarily applies to the State, the Project would comply with this policy as required by current or future regulations. As such, the Project would not conflict with and thus, would be consistent with this goal.
<p><i>Source: Eyestone Environmental, 2022. California Air Resources Board. Achieving Carbon Neutrality in California. October 2020</i></p>		

provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations, and GHG reduction actions/strategies outlined in CARB's 2008 *Climate Change Scoping Plan* and subsequent updates, SCAG's 2020–2045 RTP/SCS, City of Los Angeles' Green New Deal and Metro's 2019 CAAP. As the Project would be consistent with and not conflict with relevant plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs, impacts related to regulatory consistency would be less than significant. **Therefore, the Project would not conflict with, and thus, would be consistent with, any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project would be consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.**

## (2) Mitigation Measures

Project-level impacts related to GHG emissions would be less than significant. Therefore, no mitigation measures are required.

## (3) Level of Significance After Mitigation

Project-level impacts related to GHG emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.

## e. Cumulative Impacts

### (1) Impact Analysis

As explained above, the analysis of a project's GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any single project alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Table IV.G-7 on page IV.G-53 illustrates that implementation of the Project's regulatory requirements and project design features, including State mandates, would contribute to GHG reductions. These reductions support State goals for GHG emissions reduction.

The analysis shows that the Project is consistent with CARB's *2008 Climate Change Scoping Plan* and subsequent updates, 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. The Project is also consistent with SCAG's 2020–2045 RTP/SCS' regulatory requirements to reduce regional GHG emissions from the land use and transportation sectors by 2035. Furthermore, the Project would generally not conflict with or hinder the aspirations of Metro's 2019 CAAP and the City's Green New Deal, which includes specific targets related to mobility and transit. Given the Project's consistency with Statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to GHG emissions and their effects on climate change would not be cumulatively considerable. **For these reasons, the Project's cumulative contribution to global climate change would be less than significant.**

### (2) Mitigation Measures

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

### (3) Level of Significance After Mitigation

Cumulative impacts related to GHG emissions were determined to be less than significant without mitigation. Therefore, no mitigation measures were required, and the impact level remains less than significant.