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## APPENDICES

### Appendix

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## **4.7 GREENHOUSE GAS EMISSIONS**

This section discusses the existing greenhouse gas (GHG) emissions and the Project's potential impacts related to GHG emissions.

### **4.7.1 SUMMARY OF PREVIOUS ENVIRONMENTAL DOCUMENTATION**

#### **MND for the Pacific Place Project**

The Greenhouse Gas (GHG) analysis for the MND for the Prior Project determined that implementation of the Prior Project would have less than significant impacts related to GHG emissions.

According to the MND, estimated annual operational GHG emissions for the Prior Project, including amortized construction emissions, were 1,506 MTCO<sub>2</sub>e/yr. The Prior Project GHG emissions were determined to be less than the SCAQMD-recommended Tier 3 of 3,000 MTCO<sub>2</sub>e/yr threshold for all land use types. Thus, the direct and indirect GHG emissions of the Prior Project were determined to result in a less than significant impact.

Additionally, the MND determined that the Prior Project would not conflict with the goals established within any of the established plans, policies, or regulations adopted for the purpose of reducing GHG emissions. As such, it was determined that the Prior Project would result in no impact related to this threshold, and no mitigation measures were required.

#### ***MND Mitigation Measures***

The MND concluded that the Prior Project would result in less than significant impacts related to GHG emissions. As such, no mitigation measures were adopted as part of the MND.

### **4.7.2 ENVIRONMENTAL SETTING**

In order to ensure that all potential impacts of the Project have been evaluated, the existing conditions and impacts discussions in this Section 4.7 include the condition of the Project Site prior to the Surcharge Activities and the grading and other work that were part of the Surcharge Activities.

#### **A. Existing Conditions**

##### **Greenhouse Gases**

Climate change is a recorded change in the average weather of the earth measured by variables such as wind patterns, storms, precipitation, and temperature. Increasing GHG emissions have led to an anthropogenic<sup>1</sup> warming trend of the Earth's average temperature, which is causing changes in the earth's climate. GHG emissions are primarily associated with (1) the burning of fossil fuels during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition. This increasing temperature phenomenon is known as "global warming", and the climatic effect is known as "climate change" or "global climate change".

GHGs are atmospheric gases and clouds within the atmosphere that influence the Earth's temperature by absorbing most of the infrared radiation that rises from the sun-warmed surface

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<sup>1</sup> Caused or produced by humans.

and that would otherwise escape into space. This process is commonly known as the “Greenhouse Effect”. GHGs are emitted by natural processes and human activities. The Earth’s surface temperature averages about 58 degrees Fahrenheit (°F) because of the Greenhouse Effect. Without it, the Earth’s average surface temperature would be somewhere around an uninhabitable 0°F. Anthropogenic GHG emissions enhance the Greenhouse Effect by absorbing radiation from other atmospheric GHGs that would otherwise escape into space, thereby trapping more radiation in the atmosphere and causing temperatures to increase.

GHGs, as defined under California’s Assembly Bill (AB) 32, 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>). CO<sub>2</sub> is the most important anthropogenic GHG.<sup>2</sup> The global atmospheric concentration of CO<sub>2</sub> has increased from a pre-industrial (roughly 1750) value of about 280 parts per million (ppm) primarily due to fossil fuel use. The annual growth rate in CO<sub>2</sub> concentrations continues to increase, with a larger annual CO<sub>2</sub> concentration growth.

GHGs are global pollutants and are therefore unlike air pollutants such as ozone, particulate matter, and toxic air contaminants (TACs), which are pollutants of regional and local concern. While pollutants with localized air quality effects have relatively short atmospheric lifetimes (generally on the order of a few days), GHGs have relatively long atmospheric lifetimes, ranging from one year to several thousand years. Long atmospheric lifetimes allow for GHGs to disperse around the globe.

GHGs vary widely in the power of their climatic effects; therefore, climate scientists have established a unit called a global warming potential (GWP). The GWP of a gas is a measure of both potency and lifespan in the atmosphere as compared to CO<sub>2</sub>. For example, since CH<sub>4</sub> and N<sub>2</sub>O are approximately 21 and 310 times more powerful than CO<sub>2</sub>, respectively, in their ability to trap heat in the atmosphere, they have GWPs of 21 and 310, respectively (CO<sub>2</sub> has a GWP of 1). Carbon dioxide equivalent (CO<sub>2</sub>e) is a quantity that enables all GHG emissions to be considered as a group despite their varying GWP. The GWP of each GHG is multiplied by the prevalence of that gas to produce CO<sub>2</sub>e.

Climate change effects in California are anticipated to impact the following: public health, wildfires, energy, droughts, sea level and flooding, agriculture, forestry, and ecosystems.

### **Existing GHG Emissions**

Table 4.7-1, Comparison of Worldwide Greenhouse Gas Emissions, compares the magnitude of GHG emissions on the global, national, and State levels. CO<sub>2</sub>e emissions are commonly expressed as metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e); larger quantities of emissions, such as on the State or world scale, are expressed as million metric tons of carbon dioxide equivalent (MMTCO<sub>2</sub>e). Metric tons may also be stated as “tonnes”. The CO<sub>2</sub>e for a gas is derived by multiplying the tons of the gas by the associated GWP, such that MMTCO<sub>2</sub>e = (million metric tons of a GHG) x (GWP of the GHG). For example, the GWP for CH<sub>4</sub> is 21. This means that emission of 1 million metric ton of CH<sub>4</sub> is equivalent to the emissions of 21 million metric tons of CO<sub>2</sub>.

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<sup>2</sup> General discussions on climate change often include water vapor, ozone, and aerosols in the GHG category. Water vapor and atmospheric ozone are not gases that are formed directly in the construction or operation of development projects, nor can they be controlled in these projects. Aerosols are not gases. While these elements have a role in climate change, they are not considered by either regulatory bodies (such as the California Air Resources Board [CARB]) or climate change groups (such as the California Climate Action Registry [CCAR]) as gases to be reported or analyzed for control. Therefore, no further discussion of water vapor, atmospheric ozone, or aerosols is provided in this EIR section.

**TABLE 4.7-1  
COMPARISON OF WORLDWIDE GREENHOUSE GAS EMISSIONS**

Area and Data Year	Annual GHG Emissions (MMTCO <sub>2</sub> e)
World (2020)	47,500
United States (2021)	6,340
California (2021)	381
GHG: greenhouse gas; MMTCO <sub>2</sub> e: million metric tons of carbon dioxide equivalent.	
<sup>1</sup> AB32 Reporting requirements for direct emissions.	
Source: WRI 2023; USEPA 2023; CARB 2023; AB32 Reporting	

The most common GHG is CO<sub>2</sub>, which constitutes approximately 79 percent of all GHG emissions in the United States and California (USEPA 2023). The primary contributors to California GHG emissions are (1) transportation (38 percent), (2) industrial uses (22 percent), and (3) electric power production from both in-state and out-of-state sources (11 percent).

GHG emissions are generated on an annual basis from the Project Site by area sources, energy sources, mobile sources, solid waste disposal, and water and wastewater transportation and treatment. Area source emissions are generated by the operation of landscape maintenance equipment and the use of consumer products. Energy sources are generated by the consumption of natural gas for heating, hot water, and cooking, and the generation of electricity. Mobile source emissions are generated by the vehicles traveling to and from the Project Site. Solid waste disposal generates GHG emissions through transportation and processing of solid waste and release of CH<sub>4</sub> at landfills. GHGs for water supply, distribution, and treatment and wastewater treatment result from the electricity required for those processes.

## **B. Regulatory Framework**

### **Federal**

#### ***U.S. Environmental Protection Agency Findings***

On December 7, 2009, the U.S. Environmental Protection Agency (USEPA) Administrator signed two distinct findings regarding GHGs under Section 202(a) of the Clean Air Act.

- **Endangerment Finding:** The Administrator finds that the current and projected concentrations of the six key well-mixed greenhouse gases in the atmosphere —CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub> threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the greenhouse gas pollution which threatens public health and welfare.

The findings do not themselves impose any requirements on industry or other entities. However, this action was a prerequisite for implementing GHG emissions standards for vehicles (USEPA 2009). A light-duty vehicle is defined as any motor vehicle with a gross vehicle weight of 6,000 pounds or less (CARB 2021a).

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## **Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards**

The USEPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) have been working together on developing a National Program of regulations to reduce GHG emissions and to improve the fuel economy of light-duty vehicles. On April 1, 2010, the USEPA and NHTSA announced a joint Final Rulemaking establishing standards for 2012 through 2016 model year vehicles. On October 15, 2012, the agencies issued a Final Rulemaking with standards for model years 2017 through 2025. The rules require these vehicles to meet an estimated combined average emissions level of 295 grams of CO<sub>2</sub> per mile by 2012, decreasing to 250 grams per mile by 2016, and finally to an average industry fleet-wide level of 163 grams per mile in model year 2025. The 2016 standard is equivalent to 35.5 miles per gallon (mpg) and the 2025 standard is equivalent to 54.5 mpg if the levels were achieved solely through improvements in fuel efficiency. The agencies expect, however, that a portion of these improvements will occur due to air conditioning technology improvements (i.e., they will leak less) and due to the use of alternative refrigerants, which would not contribute to fuel economy. These standards would cut GHG emissions by an estimated 2 billion metric tons and 4 billion barrels of oil over the lifetime of the vehicles sold under the program (model years 2017–2025). The combined USEPA GHG standards and NHTSA Corporate Average Fuel Economy (CAFE) standards resolve previously conflicting requirements under both federal programs and the standards of the State of California and other States that have adopted the California standards (USEPA and NHTSA 2012).

On September 19, 2019, NHTSA and the USEPA issued a final action entitled the “One National Program Rule” (SAFE-1) to enable the federal government to provide nationwide uniform fuel economy and GHG emission standards for automobile and light duty trucks. This action finalized critical parts of the Safer, Affordable, Fuel-Efficient (SAFE) Vehicles Rule that was first proposed in August 2018. In this proposal, the agencies proposed new and amended GHG and CAFE standards for model year 2021 to 2026 light duty vehicles (USEPA and NHTSA 2019).

In this action, USEPA withdrew the Clean Air Act waiver that had been granted to the State of California in January 2013 for the State's Advanced Clean Car program with respect to GHG and Zero Emission Vehicle (ZEV) elements. In November 2019, California, 21 other states, the District of Columbia, and four California cities filed a petition for the USEPA to reconsider SAFE-1. A petition for reconsideration was also filed by several environmental groups.

On April 28, 2021, USEPA published a Notice of Reconsideration: California State Motor Vehicle Pollution Control Standards; Advanced Clean Car Program; Reconsideration of a Previous Withdrawal of a Waiver of Preemption; Opportunity for Public Hearing and Public Comment. The public comment period closed July 6, 2021 (USEPA 2021).

On March 14, 2022, the USEPA determined that the actions taken as a part of SAFE-1 were decided in error and are now entirely rescinded. With this action California's authority under the Clean Air Act (CAA) to implement its own greenhouse gas emission (GHG) emission standards and zero emission vehicle (ZEV) sales mandate is restored (USEPA 2022a).

### **State**

#### **Assembly Bill 1493 (Mobile Source Reductions)**

AB 1493, adopted September 2002, also known as Pavley I, requires the development and adoption of regulations to achieve the maximum feasible reduction of GHGs emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for

personal transportation in the State. The emission standards have become increasingly more stringent through the 2016 model year. California committed to further strengthening these standards beginning in 2017 to obtain a 45 percent GHG reduction from 2020 model year vehicles (CARB 2021b). Regulations to make California emissions standards for model year 2017 and beyond consistent with federal standards were adopted in 2012 and are discussed further below.

### ***California Air Resources Board's Advanced Clean Cars Program***

In January 2012, California Air Resources Board (CARB) approved the Advanced Clean Cars Program, an emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. The program also requires car manufacturers to offer for sale an increasing number of ZEVs each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles. In March 2017, CARB adopted GHG standards for 2022 through 2025 model years and directed staff to begin rule development for 2026 and subsequent model years (CARB 2021c).

### ***Executive Order S-3-05 (Statewide GHG Targets)***

On June 1, 2005, Governor Arnold Schwarzenegger signed Executive Order (EO) S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce snowpack in the Sierra Nevada Mountains; could further exacerbate California's air quality problems; and could potentially cause a rise in sea levels. In an effort to avoid or reduce the impacts of climate change, Executive Order S-3-05 calls for a reduction in GHG emissions to the year 2000 level by 2010, to year 1990 levels by 2020, and to 80 percent below 1990 levels by 2050.

However, executive orders do not have the same status as a law because under California's constitution, it is the Legislature, not the Governor, who is entrusted with the role of making statewide laws. The Legislature declined to include the EO's 2050 goal in AB 32 (discussed below), and again declined to use the EO's 2050 goal in adopting Senate Bill (SB) 375 (discussed below), nor has it incorporated it in any implementing legislation or applicable plans. Additionally, although CARB has the requisite authority to adopt whatever regulations are necessary beyond the AB 32 horizon year 2020 to meet the target set forth in S-3-05, the agency has not done so. Since the Legislature has never enacted EO S-3-05's 2050 target, and no expert agency has interpreted the California Environmental Quality Act (CEQA) to require it, the 2050 target has only the force and effect of an executive order issued by a former Governor. If the Legislature has delegated any of its authority to define CEQA's requirements, it delegated that authority to the Governor's Office of Planning and Research (OPR).

### ***Senate Bill 97 and the CEQA Guidelines***

Pursuant to SB 97, OPR developed and California Natural Resources Agency (CNRA) adopted proposed amendments to the CEQA Guidelines (CEQA Amendments) for the feasible mitigation of GHG emissions and their effects. The CEQA Amendments became effective on March 18, 2010.

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Among other things, the CNRA noted in its Public Notice for these changes that impacts of GHG emissions should focus on the cumulative impact on climate change. The Public Notice states (CNRA 2009a):

While the Proposed Amendments do not foreclose the possibility that a single project may result in greenhouse gas emissions with a direct impact on the environment, the evidence before [CNRA] indicates that in most cases, the impact will be cumulative. Therefore, the Proposed Amendments emphasize that the analysis of greenhouse gas emissions should center on whether a project's incremental contribution of greenhouse gas emissions is cumulatively considerable.

Thus, the CEQA Amendments continue to make clear that the significance of greenhouse gas emissions is most appropriately considered on a cumulative level.

### ***Assembly Bill 32 (Statewide GHG Reductions)***

In furtherance of the goals established in EO S-3-05, the California Legislature adopted the public policy position that global warming is “a serious threat to the economic well-being, public health, natural resources, and the environment of California” (California Health and Safety Code, Section 38501). The public policy statements became law with the enactment of the California Global Warming Solutions Act of 2006 (AB 32) in September 2006, after considerable study and expert testimony before the Legislature. The law instructs CARB to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. AB 32 directed CARB to set a GHG emission limit based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. The scoping plan is described further below. (State of California 2006)

### ***Executive Order B-30-15 (Statewide Interim GHG Targets)***

California EO B-30-15 (2015) set an “interim” statewide emission target to reduce GHG emissions to 40 percent below 1990 levels by 2030 and directed State agencies with jurisdiction over GHG emissions to implement measures pursuant to statutory authority to achieve this 2030 target and the 2050 target of 80 percent below 1990 levels. Specifically, the Executive Order directed CARB to update the Scoping Plan to express this 2030 target in metric tons. (State of California 2015)

### ***Senate Bill 32/Assembly Bill 197***

SB 32, signed September 8, 2016, implements a goal of EO B-30-15. Under SB 32, in “adopting rules and regulations to achieve the maximum technologically feasible and cost-effective greenhouse gas emissions reductions,” CARB must ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. SB 32's findings state that CARB will “achieve the state's more stringent greenhouse gas emission reductions in a manner that benefits the state's most disadvantaged communities and is transparent and accountable to the public and the Legislature.” AB 197, a companion to SB 32, adds two members to the CARB and requires measures to increase transparency about GHG emissions, climate policies, and GHG reduction actions. (State of California 2016a, 2016b)

### ***California Air Resources Board Scoping Plan***

On December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. CARB determined that achieving the 1990 emission level would

require a reduction of GHG emissions of approximately 28.5 percent below what would otherwise occur in 2020 in the absence of new laws and regulations (referred to as “business as usual”). The Scoping Plan evaluates opportunities for sector-specific reductions; integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities; identifies additional measures to be pursued as regulations; and outlines the role of a cap-and-trade program. (CARB 2008)

#### First Update to the Climate Change Scoping Plan

CARB approved the final “First Update to the Climate Change Scoping Plan” on May 22, 2014. The first update describes California’s progress towards AB 32 goals, stating that “California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32”. Specifically, “if California realizes the expected benefits of existing policy goals (such as 12,000 megawatts [MW] of renewable distributed generation by 2020, net zero energy homes after 2020, existing building retrofits under AB 758, and others) it could reduce emissions by 2030 to levels squarely in line with those needed in the developed world and to stay on track to reduce emissions to 80 percent below 1990 levels by 2050” (CARB 2014). Reducing the “business as usual” condition of 509 metric tons carbon dioxide equivalent (MMTCO<sub>2</sub>e) to the 1990 emissions level of 431 MMTCO<sub>2</sub>e will require a reduction of 78 MMTCO<sub>2</sub>e, or approximately a 15.3 percent reduction (compared to a 28.5 percent reduction as set forth in the original Scoping Plan but not directly comparable because of the change in methodology). (CARB 2014)

#### Second Update to the Climate Change Scoping Plan

CARB prepared a second update to the Scoping Plan to reflect the 2030 target established in Executive Order B-30-15 and in Senate Bill 32 (discussed above). The Final Proposed 2017 Scoping Plan was published in November 2017, and the third public Board Meeting for the Proposed Scoping Plan was held on December 14, 2017, where the Final Proposed 2017 Climate Change Scoping Plan (Second Update to the Climate Change Scoping Plan, or 2017 Scoping Plan Update) was adopted.

The 2017 Scoping Plan Update includes new statutory GHG reduction requirements that were not included in the current Scoping Plan, including Senate Bill 32 (discussed below) which sets a 40 percent GHG reduction target below 1990 GHG levels to be achieved by 2030, SB 350 (which sets a 50 percent reduction in GHG emissions from electricity generation and other energy uses in existing structures, and a 50 percent renewable energy portfolio requirement), and SB 650 (which establishes priority GHG reduction targets for designated types of greenhouse gases such as methane). The key elements of the 2017 Scoping Plan Update proposal call for further GHG reductions from the refinery sector specifically, further reductions from other stationary sources through either a renewed and expanded cap and trade or carbon tax program, further reductions from other sectors such as transportation technologies and services, water and solid waste conservation and management, and land uses in both open space and urban areas. (CARB 2017)

#### 2022 Scoping Plan Update

The 2022 Scoping Plan assesses progress towards achieving carbon neutrality by 2045 or earlier through the reduction of emissions by 85 percent below 1990 levels. The Scoping Plan takes an aggressive approach to decreasing fossil fuel use and decarbonization of every sector of emissions. Measures include moving to zero-emission transportation, phasing out the use of fossil fuel gas used for heating, reduction in the use of chemicals and refrigerants with high global warming potential, development of sustainable infrastructure that provides opportunities for



walking, biking and public transit to reduce reliance on automobiles, and development of renewable energy. (CARB 2022)

### **Senate Bill 375 (Land Use Planning)**

Signed September 30, 2008, SB 375 provides for a new planning process to coordinate land use planning and regional transportation plans (RTPs) and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 requires Metropolitan Planning Organizations, including the Southern California Association of Governments (SCAG), to incorporate a Sustainable Communities Strategy (SCS) in their regional transportation plans that will achieve GHG emission reduction targets set by CARB. There are two mutually important facets to SB 375: reducing vehicle miles traveled and encouraging more compact, complete, and efficient communities for the future. SB 375 also includes provisions for exemptions from or streamlined CEQA review for projects classified as transit priority projects (SCAG 2020). See additional discussion of the SCAG plan under “Regional” regulations below.

### **Senate Bills 1078, 107, and SBX1-2 (Renewable Portfolio Standards)**

Established in 2002 under SB 1078, accelerated in 2006 under SB 107, and again in 2011 under SBX1-2, California’s Renewable Portfolio Standard (RPS) requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020. Initially, the Renewable Portfolio Standard provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly owned utilities to the entities subject to RPS. (State of California 2002, 2006, 2011).

### **Senate Bill 350**

SB 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of EO B-30-15. The objectives of SB 350 are as follows:

- (1) To increase from 33 percent to 50 percent, the procurement of our electricity from renewable sources; and
- (2) To double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation (CEC 2021a).

### **Senate Bill 100**

On September 10, 2018, Governor Brown signed SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 requires renewable energy and zero-carbon resources to supply 100 percent of electric retail sales to end-use customers and 100 percent of electricity procured to serve state agencies by December 31, 2045. This policy requires the transition to zero-carbon electric systems that do not cause contributions GHG emissions elsewhere in the western electricity grid (CEC 2021b). SB 100 also creates new standards for the RPS goals established by SB 350 in 2015. Specifically, the bill increases required energy from renewable sources for both investor-owned utilities and publicly owned utilities from 50 percent to 60 percent by 2030.

### **Executive Order B-55-18**

On September 10, 2018, Governor Brown also signed California EO B-55-18, which sets a new statewide goal of carbon neutrality as soon as possible, and no later than 2045, and achieve net negative emissions thereafter. EO B-55-18 was added to the existing Statewide targets of

reducing GHG emissions, including the targets previously established by Governor Brown of reducing emissions to 40 percent below 1990 levels by 2030 (EO B-30-15 and SB 32), and by Governor Schwarzenegger of reducing emissions to 80 percent below 1990 levels by 2040 (EO S-3-05). (State of California 2018).

### ***Executive Order N-79-20***

On September 23, 2021, Governor Newsom announced that California will phase out the sale of new gasoline and diesel-powered cars to reduce GHG emissions. The Executive Order directs the State to require that, by 2035, all new cars and passenger trucks sold in California be zero-emission vehicles. This would aid in reducing CO<sub>2</sub> emissions, half of which are from the transportation sector. (State of California 2021).

### ***Title 24 Energy Efficiency Standards***

The Energy Efficiency Standards for Residential and Non-residential Buildings (24 CCR, Part 11) were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The currently applicable standards are the 2022 Standards, effective January 1, 2023 (CBSC 2022). The 2022 standards focus on four key areas: smart residential photovoltaic systems, updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa), residential and nonresidential ventilation requirements, and non-residential lighting requirements. The ventilation measures improve indoor air quality, protecting homeowners from air pollution originating from outdoor and indoor sources (CEC 2022). The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas and electricity use produce GHG emissions. The goal of the standards is to reduce energy use in new homes by more than 50 percent.

The California Energy Commission (CEC) adopted the 2008 changes to the Building Energy Efficiency Standards in order to (1) "Provide California with an adequate, reasonably-priced, and environmentally-sound supply of energy" and (2) "Respond to Assembly Bill 32, the Global Warming Solutions Act of 2006, which mandates that California must reduce its GHG emissions to 1990 levels by 2020". Additionally, it has been California policy that all new residential buildings will be zero net energy (ZNE) by 2020 and new commercial buildings will be ZNE by 2030, as described in the 2008 California Public Utilities Commission (CPUC) long-term energy efficiency strategic plan. The 2022 Title 24 Energy Efficiency Standards establish building design and construction requirements that move closer to achieving California's ZNE goals through encouragement of energy efficient heat pumps, electric-ready alternatives to use of natural gas, electric vehicle charging options, renewable energy generation and electricity storage, as well improving indoor air quality through ventilation standards. The requirements of the energy efficiency standards result in the reduction of natural gas and electricity consumption. Both natural gas use and electricity generation result in GHG emissions (CBSC 2022).

### ***California Green Building Standards Code***

The 2022 California Green Building Standards Code (24 CCR, Part 11), also known as the CALGreen code, contains mandatory requirements and voluntary measures for new residential and nonresidential buildings (including buildings for retail, office, public schools and hospitals) throughout California) (CBSC 2022). The development of the CALGreen Code is intended to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the following construction practices: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental quality. In short, the code is established to reduce construction

waste; make buildings more efficient in the use of materials and energy; and reduce environmental impact during and after construction. (CBSC 2022)

### **California Air Pollution Control Officers Association**

The California Air Pollution Control Officers Association (CAPCOA) is the association of Air Pollution Control Officers representing all 35 local air quality agencies throughout California. CAPCOA is not a regulatory body but has been an active organization in providing guidance in addressing the CEQA significance of GHG emissions and climate change as well as other air quality issues. The December 2021 Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (“Handbook”) provides tools for evaluating greenhouse gas reduction measures, climate vulnerabilities and promoting equity to support sustainable, resilient, and equitable land use planning and project design. The Handbook provides methods to quantify GHG emission reductions from a specified list of measures, primarily focused on project-level actions. The Handbook also includes a method to assess potential benefits of different climate vulnerability reduction measures, as well as measures that can be implemented to improve health and equity, again at the project level. The Handbook builds on CAPCOA’s previous efforts to provide accurate and reliable quantification measures. In August of 2010, CAPCOA published the first iteration entitled Quantifying Greenhouse Gas Mitigation Measures, A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures (“2010 Handbook”). Since that time, climate science has evolved and GHG reduction practices have advanced in sophistication. New priorities have also arisen, such as strengthening climate resilience and infusing health and equity into integrated planning efforts. The Handbook development process involved five key tasks: (1) measures from the 2010 Handbook; (2) evaluating and selecting climate risk reduction and health and equity measures; (3) developing methods to quantify GHG emissions reduction measures and identify associated co-benefits; (4) developing methods to assess climate change vulnerability and a framework to quantify reductions in climate vulnerabilities; and (5) developing health and equity measures. (CAPCOA 2021)

This publication’s methods are used in the California Emission Estimator Model (CalEEMod) computer model that is used to calculate GHG emissions.

## **Regional**

### **Southern California Association of Governments**

As previously discussed, SB 375 specifically required Metropolitan Planning Organizations (MPOs), including SCAG, to incorporate an SCS in their RTPs that will achieve GHG emission reduction targets set by CARB. SCAG’s current SCS is included in its 2024–2050 RTP/SCS Connect SoCal (SCAG 2024) for counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura.<sup>3</sup> Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The document was adopted by SCAG on April 4, 2024.

### **South Coast Air Quality Management District**

As previously discussed in Section 4.2, Air Quality, of this Draft EIR, air quality in Los Angeles is regulated by the SCAQMD, the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (SoCAB), which includes Los Angeles. To that end, the

<sup>3</sup> The 2020-2045 RTP/SCS succeeds the 2016-2040 RTP/SCS.

SCAQMD, a regional agency, works directly with SCAG, County transportation commissions, and local governments and cooperates actively with all federal and State government agencies. The SCAQMD develops rules and regulations; establishes permitting requirements for stationary sources; inspects emissions sources; and enforces such measures through educational programs or fines, when necessary.

### **City of Long Beach**

#### ***City of Long Beach Climate Action and Adaptation Plan***

The Long Beach Climate Action Plan (LB CAP), also known as the Climate Action and Adaptation Plan, was approved by the City Council on August 16, 2022. The LB CAP is intended to be used for CEQA streamlining for project-level GHG analysis on a project-by-project basis pursuant to Section 15183.5 of the State CEQA Guidelines. The LB CAP is a comprehensive planning document outlining goals and policies to create a more sustainable, resilient and equitable city by addressing climate change in a way that remedies existing environmental health disparities while also improving health and quality of life and enhancing economic vitality throughout the City. The LB CAP provides a framework for reducing GHG emissions, tracking the City's progress, and preparing for the impacts of climate change. Additionally, the LB CAP contains a consistency review checklist that is used to determine a project's consistency with the LB CAP. (City of Long Beach 2022).

#### ***Cooling Long Beach: Urban Heat Island Reductions Strategies***

Cooling Long Beach: Urban Heat Island Reductions Strategies identifies a wide range of methods and strategies to address extreme heat and cool the City's public streets, sidewalks, and alleyways. This document identifies a wide range of methods and strategies to address extreme heat and to cool the City's public streets, sidewalks, and alleyways. This toolkit is a resource for community members, as well as City staff, consultants, and developers in the planning, design, and implementation of streetscape projects. The Cooling Long Beach project identified sustainable design strategies to cool temperatures; improve walking, biking, connections to transit, and key community destinations; and increase the climate resiliency and well-being of the Washington Neighborhood. While the focus of the Cooling Long Beach project is on one specific area of the City, the tools and strategies found in the document can be applied broadly throughout the City and elsewhere in California and the southwest. (City of Long Beach 2020)

#### ***City of Long Beach Sustainable City Action Plan***

The City of Long Beach's Sustainable City Action Plan (SCAP) was adopted in February 2010. The SCAP was intended to guide operational, policy, and financial decisions to create a more sustainable Long Beach by 2020. Goals, initiatives, and actions within the SCAP specify deadlines between 2010 and 2020. In December 2021, the City prepared a 10 year review of the SCAP, titled 2010-2020 Sustainable City Action Plan 10 Year Review: An Overview of Accomplishments (City of Long Beach 2021). As the goals within the SCAP are no longer applicable, and the more recent Review does not identify new goals, policies, or strategies, these documents are not applicable to the Project.

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### 4.7.3 PROJECT IMPACTS

#### A. Thresholds of Significance

**Threshold 4.7a**      *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

**Threshold 4.7b**      *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gas emissions?*

#### B. Methodology

The CEQA Amendments for Greenhouse Gas Emissions state in Section 15064.4(a) that lead agencies should “make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions. The CEQA Amendments note that an agency may identify emissions by either selecting a “model or methodology” to quantify the emissions or by relying on “qualitative analysis or other performance based standards” (CNRA 2009b). Section 15064.4(b) of the CEQA Guidelines provides that the lead agency should consider the following when assessing the significance of impacts from GHG emissions on the environment (CNRA 2009b):

- The extent a project may increase or reduce GHG emissions as compared to the environmental setting;
- Whether the project emissions exceed a threshold of significance 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.

All of these are considered in the impact analysis presented in this section. The revisions to Appendix G, Environmental Checklist Form, of the CEQA Guidelines, which is often used as a basis for lead agencies’ selection of significance thresholds, do not prescribe specific thresholds. Rather, Appendix G of the CEQA Guidelines asks whether the project would conflict with a plan, policy, or regulation adopted to reduce GHG emissions or would generate GHG emissions that would significantly affect the environment, indicating that the determination of what is a significant effect on the environment should be left to the lead agency. Accordingly, the CEQA Amendments do not prescribe specific methodologies for performing an assessment; they do not establish specific thresholds of significance; and they do not mandate specific mitigation measures. Rather, the CEQA Amendments emphasize the lead agency’s discretion to determine the appropriate methodologies and thresholds of significance consistent with the manner in which other impact areas are handled in CEQA (CNRA 2009b).

The CEQA Amendments indicate that lead agencies should consider all feasible means, supported by substantial evidence and subject to monitoring and reporting, of mitigating the significant effects of GHG emissions. As pertinent to the Project, these potential mitigation measures, set forth in Section 15126.4(c) of the CEQA Guidelines, may include (1) measures in an existing plan or mitigation program for the reduction of GHG emissions that are required as part of the lead agency’s decision; (2) reductions in GHG emissions resulting from a project through implementation of project design features; (3) off-site measures, including offsets, to mitigate a project’s emissions; and (4) carbon sequestration measures (CNRA 2009b).

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According to Appendix G of the State CEQA Guidelines, a proposed project will normally have a significant adverse environmental impact related to GHG emissions if it will:

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

CEQA Section 21068 defines a “significant effect on the environment” as a substantial, or potentially substantial, adverse change in the environment. With respect to global climate change, no one project can individually create a direct impact on what is a global problem (i.e., no project will, by itself, raise the temperature of the planet).

However, the emissions generated by a project may be “cumulatively considerable”, meaning “that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects” (State CEQA Guidelines, Section 15065[a][3]). Section 15064(h)(3) of the State CEQA Guidelines adds that a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the Project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the Project is located.

Generally, the evaluation of an impact under CEQA requires measuring data from a proposed project against a “threshold of significance” (State CEQA Guidelines, Section 15064.7). Furthermore, “when adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence” (State CEQA Guidelines, Section 15064.7[c]). For GHG emissions and global warming, there is not, at this time, one established, universally agreed-upon threshold of significance by which to measure an impact, and the City has not adopted a local threshold of significance for GHG emissions. In considering GHG emission reductions, the goal is not to reduce emissions to less than a specific threshold on a project-by-project basis. This policy would be a disincentive to the creation of large projects that can achieve emissions reductions in greater quantities and more efficiently than small projects. Rather, the goal for GHG emission reductions on the plan and project level is to make a substantial contribution to the larger statewide and regional emissions reductions goals that have been and are being developed. As such, the project was analyzed to determine if it would substantially contribute to the larger Statewide and regional GHG reductions goals that have been established.

For the Project, for Threshold 4.7(a), existing and proposed GHG emissions were calculated by using CalEEMod version 2022.1.1.0 (CAPCOA 2022). CalEEMod is a computer program accepted by the SCAQMD that can be used to estimate criteria pollutant and GHG emissions associated with land development projects in California. CalEEMod has separate databases for specific counties and air districts. The Los Angeles County database was used for the Project. The model calculates emissions of carbon monoxide (CO); sulfur dioxide (SO<sub>2</sub>); respirable particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>); fine particulate matter less than 2.5 micrometers in diameter (PM<sub>2.5</sub>); the O<sub>3</sub> precursors volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>); and the GHG emissions of Bio-CO<sub>2</sub>, NBio-CO<sub>2</sub>, Total CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O,

and CO<sub>2</sub>e. For this analysis, the results are expressed in MTCO<sub>2</sub>e/yr. See Section 4.3, Air Quality, of this Draft EIR, for discussion of the CalEEMod inputs, adjustments, outputs, and other characteristics for construction-related and operational emissions. The CalEEMod results were then compared to the Tier 3 GHG thresholds developed and used by SCAQMD, which the City had determined are appropriate based on substantial evidence to use for purposes of determining the significance of the Project's GHG impacts.

Beginning in April 2008, the SCAQMD convened a Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. The Working Group was scheduled to meet once per month. On December 5, 2008, the SCAQMD Governing Board adopted its staff proposal for an interim CEQA GHG significance threshold of 10,000 MTCO<sub>2</sub>e per year (MTCO<sub>2</sub>e/yr)<sup>4</sup> for industrial projects where the SCAQMD is the lead agency. In September 2010, the Working Group presented a revised tiered approach to determining GHG significance for residential and commercial projects (SCAQMD 2010). These proposals have not yet been considered by the SCAQMD Board.

At Tier 1, GHG emissions impacts would be less than significant if the proposed Project qualifies under a categorical or statutory CEQA exemption. At Tier 2, for projects that do not meet the Tier 1 criteria, the GHG emissions impact would be less than significant if the proposed Project is consistent with a previously adopted GHG reduction plan that meets specific requirements.<sup>5</sup> At Tier 3, the Working Group proposes extending the 10,000 MTCO<sub>2</sub>e/yr screening threshold currently applicable to industrial projects where the SCAQMD is the lead agency, described above, to other lead agency industrial projects. For residential and commercial projects (that is, non-industrial projects), the Working Group proposes the following Tier 3 screening values: either (1) a single 3,000 MTCO<sub>2</sub>e/yr threshold for all land use types or (2) separate thresholds of 3,500 MTCO<sub>2</sub>e/yr for residential projects, 1,400 MTCO<sub>2</sub>e/yr for commercial projects, and 3,000 MTCO<sub>2</sub>e/yr for mixed-use projects. These screening values were developed from a survey of CEQA projects. It is estimated that projects with emissions above these values would produce 90 percent of the anticipated GHG emissions from residential/commercial projects and projects below the screening level would contribute 10 percent or less of the regional GHG emissions from land development. Therefore, a project with emissions less than the applicable screening value would be considered to have less than significant GHG emissions. Projects with emissions greater than the Tier 3 screening values would be analyzed at Tier 4 by one of three methods:

1. **A Percent Emission Reduction Target.** This method is used by the Sacramento Metropolitan and San Joaquin Valley Air Districts and the City of San Diego. The SCAQMD Working Group made no recommendation relative to this method.
2. **Early Implementation of Applicable AB 32 Scoping Plan Measures.** The Working Group assumes implementation of AB 32 measures would be incorporated in method 3 below.
3. **Efficiency Targets.** On the project level, 2020 GHG emissions should not exceed 4.8 MTCO<sub>2</sub>e/year per service population (SP) where SP is project residents plus employees.

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<sup>4</sup> GHG emissions are commonly expressed as MTCO<sub>2</sub>e. Larger quantities of emissions, such as on the world or State scale, are expressed in MMTCO<sub>2</sub>e.

<sup>5</sup> The plan must (a) quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area; (b) establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable; (c) identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area; (d) specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level; (e) establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and (f) be adopted in a public process following environmental review (State CEQA Guidelines, Section 15183.5).

Further, 2035 GHG emissions should not exceed 3.0 MTCO<sub>2</sub>e/year per SP (SCAQMD 2010).

Projects with GHG emissions not meeting the Tier 4 targets would be required to provide mitigation in the form of real, quantifiable, and verifiable offsets to achieve the target thresholds. The offsets may be achieved through project design features, other on-site methods, or by off-site actions, such as energy efficiency upgrade of existing buildings.

In summary, to date, the SCAQMD Board has adopted an interim CEQA significance threshold for GHGs for industrial projects where the SCAQMD is the lead agency and continues to consider screening levels under CEQA for residential, commercial, and mixed-use projects. This proposed screening and mitigation proposal from SCAQMD remains a work in progress; the Working Group has not convened since the fall of 2010. The proposal has not been considered or approved for use by the SCAQMD Board. However, the SCAQMD Tier 3 thresholds are widely used throughout the SoCAB, and because they are designed to capture 90 percent of the anticipated GHG emissions from residential/commercial projects and projects, the City has determined to apply this threshold to the Project for determining the significance of its GHG impacts.

For Threshold 4.7(b), to assess whether the Project would conflict with a plan or policy adopted for the purpose of reducing GHGs, this analysis examines whether the Project would conflict with CARB's 2022 Scoping Plan, SCAG's Connect SoCal 2024-2050, and the LB CAP.

### C. Standard Requirements

D. No standard requirements would apply to this Project related to greenhouse gas emissions.

### E. Impact Analysis

#### **Threshold 4.7a**      ***Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

The City has a certified Climate Action Plan (CAP), formerly called the Climate Action and Adaptation Plan, which provides the framework to achieve the City's GHG emissions reduction targets. The CAP is accompanied by a CAP Consistency Review Checklist (CAP Checklist) that, pursuant to Section 15183.5 of the State CEQA Guidelines, can be used as the basis for future assessments of consistency with this plan in lieu of a project-specific GHG CEQA analysis for discretionary projects subject to CEQA. Projects that are consistent with the demographic forecasts and land use assumptions used in the CAP (i.e., consistent with the City's General Plan Land Use Element (LUE) can utilize the CAP Checklist to demonstrate consistency with the CAP, and if consistent, can tier from the existing programmatic environmental review contained in the adopted Environmental Impact Report (EIR) for the CAP. If a project is not consistent with the land use designations of the adopted General Plan LUE, it is not eligible for streamlining of a project-level GHG analysis through the CAP Checklist unless it can be demonstrated that the requested change in land use designation would support the CAP's strategies and emissions reduction targets by changing the existing land use to a land use designation anticipated to result in fewer per-service population emissions, such as to a higher density residential or mixed-use designation near transit, which is consistent with the CAP goals and policies. Projects that are inconsistent with existing General Plan land use designations and that cannot demonstrate the General Plan Amendment (GPA) would reduce per-service population emissions compared to existing land use designations at the project site must prepare a comprehensive project-specific analysis of GHG emissions. Because the Project proposes a GPA, the Project is inconsistent with the existing General Plan land use designation and there is not enough information to reasonably conclude that the Project's GPA would reduce per-service population emissions



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compared to existing land use designations at the Project Site. As such, as prescribed by the City's CAP, a Project-specific analysis of GHG emissions has been prepared pursuant to CEQA.

For this analysis, the City has opted to use a non-zero threshold approach based on Approach 2 of the CAPCOA CEQA and Climate Change handbook, which is the Tier 3 screening value of 3,000 MTCO<sub>2e</sub> per year that is recommended by SCAQMD staff for residential and commercial projects. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) of the CAPCOA CEQA and Climate Change handbook establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is the 3,000 MTCO<sub>2e</sub>/yr screening threshold.

In setting the threshold at 3,000 MTCO<sub>2e</sub> per year, SCAQMD researched a database of projects kept by the Governor's Office of Planning and Research (OPR). That database contained 798 projects, 87 of which were removed because they were very large projects and/or outliers that would skew emissions values too high, leaving 711 as the sample population to use in determining the 90th percentile capture rate. The SCAQMD analysis of the 711 projects within the sample population combined commercial, residential, and mixed-use projects. It should be noted that the sample of projects included warehouses and other light industrial land uses but did not include industrial processes (i.e., oil refineries, heavy manufacturing, electric generating stations, mining operations, etc.). Emissions from each of these projects were calculated by SCAQMD to provide a consistent method of emissions calculations across the sample population and from projects within the sample population. In calculating the emissions, the SCAQMD analysis determined that the 90th percentile ranged between 2,983 to 3,143 MTCO<sub>2e</sub> per year. The SCAQMD set their significance threshold at the low-end value of the range when rounded to the nearest hundred tons of emissions (i.e., 3,000 MTCO<sub>2e</sub> per year) to define small projects that are considered less than significant and do not need to provide further analysis.

The City understands that the 3,000 MTCO<sub>2e</sub> per year threshold for residential/commercial uses was proposed by SCAQMD over a decade ago and was adopted as an interim policy; however, no permanent, superseding policy or threshold has since been adopted. The 3,000 MTCO<sub>2e</sub> per year threshold was developed and recommended by SCAQMD, an expert agency, based on substantial evidence as provided in the Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold (2008) document and subsequent Working Group meetings (latest of which occurred in 2010). SCAQMD has not withdrawn its support of the interim threshold and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by SCAQMD, this threshold “uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level” and, thus, remains valid for use in 2024 (SCAQMD, 2008, pp. 3-4). Lastly, this threshold has been used for hundreds, if not thousands of GHG analyses performed for projects located within the SCAQMD jurisdiction. Thus, if Project-related GHG emissions do not exceed the 3,000 MTCO<sub>2e</sub> per year threshold, then Project-related GHG emissions would have a less-than-significant impact.

Further, there are no adopted quantitative federal, State, regional, or City of Long Beach CEQA significance criteria for GHG emissions that would apply to the Project. Nevertheless, the CEQA Amendments for Greenhouse Gas Emissions state in Section 15064.4(a) that lead agencies should “make a good faith effort, to the extent possible on scientific and factual data, to describe, calculate or estimate” GHG emissions. The CEQA Amendments note that an agency may identify emissions by either selecting a “model or methodology” to quantify the emissions or by relying on “qualitative analysis or other performance based standards” (CNRA 2009b). Accordingly, the below analysis for Threshold 4.7a quantifies the Project's GHG emissions using CalEEMod

version 2022.1.1.0, and then assesses whether the quantity of emissions may have a significant impact on the environment using SCAQMD guidance.

### Short-Term Construction Impacts

Construction activities would result in the temporary generation of GHGs through worker vehicles and off-road and on-road construction equipment. The details of phasing, selection of construction equipment, and other input parameters are described in Section 4.3, Air Quality.

Because construction activity impacts are short-term, they contribute a relatively small portion of the total lifetime GHG emissions of a project. In addition, GHG emission-reduction measures for construction equipment are relatively limited. Therefore, as proposed by the SCAQMD, construction emissions are amortized over a project lifetime (typically 30 years) so that GHG reduction measures would address construction GHG emissions as part of the operational GHG-reduction strategies (SCAQMD 2008). That method is used in this analysis.

The results of the CalEEMod calculations for GHGs from construction of the Project are shown in Table 4.7-2, Estimated Construction Annual Greenhouse Gas Emissions for the Project. Project construction would result in estimated GHG emissions of approximately 2,100 MTCO<sub>2e</sub>, or annual GHG emissions of 70 MTCO<sub>2e</sub> when amortized over 30 years.

**TABLE 4.7-2  
ESTIMATED CONSTRUCTION ANNUAL  
GREENHOUSE GAS EMISSIONS FOR THE PROJECT**

Year	Emissions (MTCO <sub>2e</sub> )
2020	568
2021	79
2024	75
2025	1,106
2026	274
<b>Total</b>	<b>2,100</b>
<b>Annual Construction Emissions Amortized over 30 Years</b>	<b>70</b>
MTCO <sub>2e</sub> : metric tons of carbon dioxide equivalent	
Source: CalEEMod outputs can be found in Appendix C-3, Air Quality and Greenhouse Gas Emissions Calculations.	

Because construction emissions are amortized over a 30-year project lifetime, the level of significance for construction emissions related to the Project is included in below section on “Long-Term Operational Impacts”, and a separate significance finding for construction emissions is not necessary.

### Long-Term Operational Impacts

Operational GHG emissions for the Project were calculated in accordance with the methods described above and in Section 4.2, Air Quality, of this EIR. Mobile source inputs for trip generation were taken from the Project’s Traffic Impact Analysis, Appendix M, of this EIR (Psomas 2024). Model inputs include project-specific data for electricity consumption and water use and CalRecycle data for solid waste. The results of the calculations of operational annual GHG emissions at Project buildout (year 2026) are shown in Table 4.7-3, Estimated Annual Operational Greenhouse Gas Emissions. CalEEMod data sheets are included in Appendix C-3, Air Quality

and Greenhouse Gas Emissions Calculations of this EIR. The total operational GHG emissions at Project buildout is estimated at 649 MTCO<sub>2</sub>e per year.

**TABLE 4.7-3  
ESTIMATED ANNUAL OPERATIONAL  
GREENHOUSE GAS EMISSIONS**

Source	Emissions MTCO <sub>2</sub> e/year	Percent of Total
Area	<1	0%
Energy	17	3%
Mobile	462	71%
Solid Waste	168	26%
Water	1	0%
<b>Annual GHG Emissions</b>	<b>649</b>	<b>100%</b>

MTCO<sub>2</sub>e/year: metric tons of carbon dioxide equivalent per year; GHG: greenhouse gas(es).  
 Note: Totals may not balance due to rounding  
 Source: CalEEMod outputs can be found in Appendix C-3, Air Quality and Greenhouse Gas Emissions Calculations.

Table 4.7-4, Estimated Annual Greenhouse Gas Emissions, shows that the sum of amortized construction emissions and annual operational emissions would be approximately 719 MTCO<sub>2</sub>e/year at buildout.

**TABLE 4.7-4  
ESTIMATED ANNUAL  
GREENHOUSE GAS EMISSIONS**

Source	Emissions MTCO <sub>2</sub> e/year
Construction (amortized) (from Table 4.7-2)	70
Operations (from Table 4.7-3)	649
<b>Total Annual GHG Emissions</b>	<b>719</b>
SCAQMD-recommended project-level screening threshold	3,000
<b>Exceed threshold?</b>	<b>No</b>

MTCO<sub>2</sub>e/year: metric tons of carbon dioxide equivalent per year; GHG: greenhouse gas; SCAQMD: South Coast Air Quality Management District.  
 Note: Totals may not balance due to rounding.  
 Source: CalEEMod outputs can be found in Appendix C-3, Air Quality and Greenhouse Gas Emissions Calculations.

Because the Project is inconsistent with the existing General Plan land use designation and it cannot be determined whether the proposed GPA would result in reduced GHG emissions per service population compared to the existing land use designation, the above quantitative analysis was prepared, as directed by the LB CAP. As noted above, there are no adopted quantitative federal, State, regional, or City of Long Beach CEQA significance criteria for GHG emissions that would apply to the Project. The SCAQMD has proposed, but not adopted, a threshold of 3,000 MTCO<sub>2</sub>e per year for non-industrial land use projects, as discussed above in Sections 4.7.2 and 4.7.3. As shown, the estimated GHG emissions from the Project would be substantially less than this suggested threshold. Accordingly, the City has determined that this suggested threshold proposed by SCAQMD is an appropriate threshold against which the City can evaluate the significance of the Project's quantified GHG emissions. Because the Project's GHG emissions

are substantially less than the SCAQMD threshold, Project implementation would result in less than significant impacts.

### **Mitigation Measures**

No mitigation measures are required.

### **Level of Significance After Mitigation**

A less than significant impact would occur and therefore no mitigation is required.

***Impact Comparison Summary:*** Impacts would be less than significant pursuant to this threshold. The Project would result in similar impacts when compared with the impact analysis in the previously prepared MND, which identified a less than significant impacts pursuant to this threshold.

### **Threshold 4.7b *Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gas emissions?***

#### **2022 CARB Scoping Plan**

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Moreover, and as indicated above, the Project's level of GHG emissions would not exceed the SCAQMD recommended threshold of 3,000 MTCO<sub>2</sub>e/yr. Moreover, the Project would be consistent with the CAP as demonstrated above; therefore the Project would be consistent with the GHG reduction mandates established by SB 32 and the 2022 Scoping Plan. A less than significant impact would occur.

#### **SCAG's 2024-2050 RTP/SCS**

As discussed above, the principal State plan and policy adopted for the purpose of reducing GHG emissions is AB 32. The quantitative goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or alternative planning strategy (APS) that will address land use allocation in that Metropolitan Planning Organization's Regional Transportation Plan (RTP). The principles of SB 375 are incorporated in SCAG's adopted 2024-2050 RTP/SCS. The proposed Project is neither a housing development project nor a transportation project that would increase population within the State or increase vehicle miles travelled (VMT). As discussed under Threshold 4.7a, the Project would also not result in substantial amounts of GHG emissions from either the construction phase or from the operations phase. Although the Project would generate vehicle trips and VMT, it is reasonable to assume that many users of the self-storage units would choose the Project facility because it is closer than currently used facilities. Thus, these users would reduce VMT compared to current practice. As shown in Table 4.7-4, the Project would result in emissions which are below the SCAQMD's draft interim significance threshold for GHGs. As such, GHG emissions generated by the Project are not considered to be substantial.

Moreover, the Project would not conflict with the goals outlined in the plan, which are to build and maintain an integrated multimodal transportation network; develop, connect and sustain communities that are livable and thriving; create a healthy region for the people of today and

tomorrow; and support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. A less than significant impact would occur.

### City of Long Beach CAP

As previously discussed under Threshold 4.7a, the Project is not able to utilize the LB CAP Checklist for CEQA streamlining pursuant to Section 15183.5 of the State CEQA Guidelines; accordingly, a Project-specific GHG analysis was conducted in compliance with CEQA. Nonetheless, the Project is still required to assess whether it would conflict with goals of the LB CAP. The LB CAP contains a consistency checklist to ensure projects subject to discretionary review implement relevant GHG emission reduction actions from the LB CAP and implement relevant Adaptation Actions from the LB CAP (City of Long Beach 2022). The Project's Consistency Checklist is included as Appendix H, Long Beach Climate Action Plan (LB CAP) Checklist.

As stated previously, the LB CAP Checklist specifically applies to proposed discretionary projects that require environmental review pursuant to CEQA. Therefore, the LB CAP Checklist is an implementation tool in the City's overall strategy to reduce GHG emissions. As the Project is not able to utilize the LB CAP for streamlining purposes, the Project must prepare a comprehensive project-specific analysis of GHG emissions, and incorporate the measures in the LB CAP Checklist to the extent feasible, as defined by CEQA and subject to the City's discretion. (City of Long Beach 2022).

As discussed above, a Project specific analysis of GHG emissions has been prepared under Threshold 4.7a, above, to demonstrate less than significant impacts related to GHG emissions. However, to demonstrate consistency with the LB CAP pursuant to this Threshold 4.7(b), the LB CAP Checklist has been completed for the Project, and is included as Appendix H of this Draft EIR. A summary of the LB CAP Checklist process and findings is provided below. The Project would implement all feasible Tier 1 and Tier 2 measures identified in the LB CAP, as identified below; a number of these measures are identified as Project Design Features (PDFs) and are also identified throughout Section 3.0, Project Description of the DEIR. PDFs are specific design elements proposed by the Applicant that have been incorporated into the Project that serve to reduce or avoid potential environmental effects. Because PDFs have been incorporated into the proposed Project, they do not constitute mitigation measures, as defined by CEQA Guidelines Section 15126.4. However, all PDFs will be included in the future Mitigation Monitoring and Reporting Program (MMRP) to ensure their implementation as a part of the Project:

- The proposed Project would comply with LB CAP GHG Emission Reduction Action #1 (Building Energy, Tier 1: Zero-Carbon Electricity). Specifically, the Project would implement **PDF-1**, which requires a combination of the installation of on-site renewable energy systems and participation in Southern California Edison's (SCE's) Green Rate program to supply 100% of the proposed Project's estimated energy demand to the maximum extent feasible. As described in Section 3.0, Project Description, the Project would install solar photovoltaic panels with sufficient capacity to offset approximately 70% of the Project's electrical demand. As available, the Project applicant would be required to participate in SCE at the Green Rate level (i.e. 100% carbon free electricity) for all electricity accounts associated with the project until which time SCE provides 100% carbon-free electricity for all accounts by default (for all electricity not generated by on-site solar). As of July 9, 2024, SCE notes that "the volume of interest for both the 50% and 100% Green Rate program has exceeded the amount of capacity available from approved Green Rate resources. In the 4th Quarter of 2022, SCE launched a new request for offers for additional generation to support the increasing interest in the Green Rate program. Until new Green Rate resources are contracted, or otherwise ordered, or authorized by

the Commission, SCE will maintain a waitlist from customers interested in participating in the Green Rate program. As capacity becomes available, SCE will enroll customers onto the Green Rate on a first-come, first-served basis.” Should Green Rate electricity not be available at the time the Project obtains its first certificate of occupancy, the Project Applicant shall sign up for the SCE Green Rate waitlist and remain on the waitlist until Green Rate electricity becomes available, upon which, the Applicant would be required to enroll in SCE’s Green Rate program for all electricity associated with the Project not generated by on-site solar.

- LB CAP GHG Emission Reduction Action #2 (Building Energy, Tier 1: MUNICIPAL PROJECTS ONLY: Reduce Energy Use and Supply the Project with Renewable Electricity) only applies to Municipal Projects; as the Project is not Municipal, this GHG Emission Reduction Action is not applicable to the Project.
- The Project would comply with LB CAP GHG Emission Reduction Action #3 (Building Energy, Tier 1: Comply with All City Building Energy Codes and Ordinances). As discussion in Section 4.6, Energy, the Project would comply with all City Building Energy Codes and Ordinances.
- CAP GHG Emission Reduction Action #4 (Building Energy, Tier 2: Building Energy Efficiency) only applies to projects that include a retrofit of an existing building. As the Project does not include a retrofit, this GHG Emission Reduction Action is not applicable to the Project.
- The Project would comply with CAP GHG Emission Reduction Action #5 (Waste, Tier 1: Recyclable Materials Recycling). Specifically, the Project would implement **PDF-2**, which requires the Project would with all state and local requirements for recycling, also including but not limited to, Chapter 8.60 Solid Waste, Recycling, and Litter Prevention and Organic Waste Disposal Reduction in the City’s Municipal Code. **PDF-2** would also require the Project to:
  1. Comply with all Mandatory Construction & Demolition (C&D) Recycling Program Requirements, including Section 18.67.100.
  2. Provide substantial storage, collection, and loading of recyclables in a manner that is convenient and safe for all users of the building. Ensure there are sufficient sizes and amount of collection containers for recyclables. Containers will be kept clean, be clearly labeled, and will be co-located next to any other solid waste receptacles. The Project Applicant will ensure sufficient pick up of collection containers to meet the needs of the occupants or customers.
  3. The Project shall ensure space for multi-stream collection containers in any location where a solid waste container is traditionally housed. This includes both outdoor collection containers serviced by a waste hauler or indoor collection containers utilized by occupants. The Project shall provide educational material and training to occupants and tenants in how to properly separate recyclables from all other solid waste and place recyclables in a separate container designated for recycling.
  4. The Project Applicant shall ensure that all Project occupants and tenants separate recyclables from all other refuse and place recyclables in a separate container designated for recycling through the provision of separate containers.
  5. The Project Applicant shall ensure that all containers are audited annually to ensure proper service levels and to check for contamination and report findings back to occupants within 30 days and to the City as requested.

6. The Project Applicant shall work with the Project's waste hauler to provide educational material to tenants at least on an annual basis.
  7. The Project Applicant shall provide compliance data to the City as required for any current auditing program.
- The Project would comply with CAP GHG Emission Reduction Action #6 (Waste, Tier 1: Organics Composting). Specifically, the Project would implement **PDF-3**, which requires the Project to comply with all state and local requirements for composting and organic waste collection, including, Chapter 8.60 Solid Waste, Recycling, and Litter Prevention and Organic Waste Disposal Reduction in the City's Municipal code. **PDF-3** would also require the Project to:
    1. Provide proper storage, collection, and loading of organics in a manner that is convenient and safe for all users of the building. Ensure there are sufficient sizes of collection containers for organics. Containers shall be kept clean, be clearly labeled, and co-located next to any other solid waste receptacles. The Project Applicant shall ensure sufficient pick up of collection containers to meet the needs of occupants or customers.
    2. The Project Applicant shall ensure that the Project includes space for multi-stream collection containers for both recycling and organics in any location where a solid waste container is traditionally housed. This includes both outdoor collection containers serviced by a waste hauler or indoor collection containers utilized by occupants. The Project must provide educational material and training to occupants and tenants in how to properly separate organics from all other solid waste and place organics in a separate container designated for organics.
    3. The Project Applicant shall ensure that all Project occupants and tenants will separate compostables from all other refuse and place compostables in a separate container designated for composting.
    4. The Project Applicant shall ensure containers are audited annually to ensure proper service levels and to check for contamination and report findings back to occupants within 30 days and to the City as requested.
    5. The Project Applicant shall work with the Project's waste hauler to provide educational material to tenants at least on an annual basis.
    6. The Project Applicant shall provide compliance data to the City as required for any current auditing program.
  - CAP GHG Emission Reduction Action #7 (Waste, Tier 2: Incorporate On-site Composting, Mulching, and/or Anaerobic Digestion) requires projects to incorporate organic waste processing capabilities, such as composting, mulching, or anaerobic digestion facilities; the City has determined that this would not be applicable to the Project, as the Project does not involve land uses that would generate excessive organic waste.
  - CAP GHG Emission Reduction Action #8 (Transportation, Tier 2: Meets Transportation Screening Criteria) provides an opportunity for projects to screen out of checklist questions #9 through #14 if the Project would meet one of the following criteria: Is the project located in a Transit Priority Area or High Quality Transit Area; Does the project include local-serving retail (e.g., grocery stores, pharmacies, or restaurants) less than 50,000 square feet; Does the project include 100 percent affordable housing units(excluding the Manager's unit); or Will the project result in less than 110 total daily vehicle trips at full

buildout. As the Project does not meet these criteria, Action #8 is not applicable. The CAP Checklist then directs the Project to proceed to Checklist questions #9 through #14.

- CAP GHG Emission Reduction Action #9 (Transportation, Tier 1: Trip Reduction Features to Reduce Vehicle Miles Traveled) requires projects to incorporate vehicle trip reduction features into the project design as mitigation measures; specifically, this measure requires that these features achieve a minimum of five percent reduction in vehicle trips and VMT compared to the project without such vehicle trip reduction features.

According to the City's latest TIA guidance, the Project is presumed to have a less than significant impact related to VMT, as it would result in less than 500 ADT. Moreover, the Project is a local serving use and would likely result in a slight reduction in overall VMT, as it would provide self-storage and RV storage opportunities in the City that patrons would have otherwise had to drive further for. Beyond bicycle parking for employees, which the Project already includes, additional VMT reductions would not be applicable to this land use, as it is unlikely that RV Storage and Self-Storage customers would arrive to the Project Site via alternative modes of transportation. As such, this GHG Reduction Action is not applicable to the Project.

- The Project would implement CAP GHG Emission Reduction Action #10 (Transportation, Tier 1: Incorporate Pedestrian Infrastructure) which requires projects to incorporate pedestrian infrastructure into its design. Specifically, the Project would implement **PDF-4**, which requires the Project to set aside an easement along the southern border of the Project Site to provide future pedestrian and bicycle access to the Los Angeles River, should a future trail be developed. Should a future trail be developed, this easement would provide a publicly accessible trail/trailhead and improve the walking environment within the City. All pedestrian facilities and connections would be with the City's Mobility Element, CX3 Pedestrian Plan, and any other relevant governing plans.
- The Project would also increase sidewalk coverage within the Project Site, improving pedestrian access. The Project would not improve degraded or substandard sidewalks, as none exist on the Project Site and this portion of the measure is not applicable to the Project. The Project would plant and maintain trees, providing shades or pedestrians on-site. The Project would incorporate best practices, as feasible, to ensure pedestrian infrastructure is contiguous and links externally with existing and planned pedestrian facilities; best practices include high-visibility crosswalks, pedestrian hybrid beacons, and other pedestrian signals, mid-block crossing walks, pedestrian refuge islands, speed tables, bulb-outs (curb extensions), curb ramps, signage, pavement markings, pedestrian-only connections and districts, landscaping, and other improvements to pedestrian safety 6. Minimize barriers to pedestrian access and interconnectivity, such as walls, landscaping buffers, slopes, and unprotected crossings
- The Project would implement CAP GHG Emission Reduction Action #11 (Transportation, Tier 1: Incorporate Bicycle Infrastructure) which requires projects to incorporate bicycle infrastructure into its design; specifically, **PDF-4** requires the Project to set aside an easement along the southern border of the Project Site to provide future pedestrian and bicycle access to the Los Angeles River, should a future trail be developed. Should a future trail be developed, this easement would provide a publicly accessible trail/trailhead and improve the cycling environment within the City. **PDF-5** would also require the Project to provide 15 bicycle parking spaces along the front parking lot area, encouraging individual to take alternative modes of transportation. The Project would only create approximately 10 new jobs and the Project would provide 15 bicycle parking spaces along the front parking lot area, consistent with the City's code of ordinance and the City's bicycle master plan, to encourage employees to utilize alternate modes of transportation for their commute. As stated previously, the RV Storage and Self-Storage land uses are not ones



that patrons would be likely to utilize alternative modes of transportation. As such, it has been determined that provision of an additional 15 bicycle stalls would be adequate for this project type.

- The Project would implement CAP GHG Emission Reduction Action #12 (Transportation, Tier 1: Incorporate Electric Vehicle Charging Infrastructure) which requires projects to comply with any CalGREEN requirement, City ordinance, building code, or condition of approval that requires a certain amount of EV charging infrastructure and readiness. This may include minimum requirements for EV charging stations, EV capable parking spaces, and EV-ready parking spaces. The Project would be required to comply with all of the aforementioned requirements and regulations.
- The Project would implement CAP GHG Emission Reduction Action #13 (Transportation, Tier 1: Comply with City TDM Ordinance) which requires projects to comply with the City's TDM ordinance at the time of project approval. The Project would comply with the City's TDM ordinance, as applicable.

This Action also requires projects to comply with any applicable VMT reduction target and incorporate any required monitoring mechanisms for development, subject to the ordinance. As stated previously, the Project was found to have a less than significant impact on VMT. As such, there are no VMT reduction targets applicable the Project.

- The Project would implement CAP GHG Emission Reduction Action #14 (Transportation, Tier 1: Comply with City's Transportation Impact Guidelines) which requires projects to comply with the City's Transportation Impact (TIA) Guidelines ordinance at the time of project approval. A Project-specific TIA was prepared for the Project in compliance with the City's TIA guidelines and is included as Appendix M of this DEIR.
- The Project would implement CAP GHG Emission Reduction Action #15 (Transportation, Tier 2: High-Density, Mixed-Use, Transit-Oriented, Walkable Infill Project Design), as feasible. Specifically, Action #15 states that projects should maximize the following characteristics whenever feasible:
  1. Located in a transit priority area or transit corridor. *(This would not be feasible as the Project is not located in a transit priority area or transit corridor).*
  2. Includes local-serving retail (e.g., grocery stores, pharmacies, or restaurants) *(This would not be feasible as the Project would not include local-serving retail).*
  3. Includes 100 percent affordable housing units or an otherwise high level of *affordable* housing as defined by the City for the project site *(This would not be applicable as the Project is not a residential project)*
  4. Includes a mix of land uses *(The Project would comply with this part of the action, providing both RV storage and Self-Storage land uses)*
  5. Includes shared and reduced parking strategies, such as shared parking *facilities*, carpool/vanpool-only spaces, shuttle facilities, EV-only spaces, and reduced parking below allowable amount *(The Project would comply with this part of the action, providing EV Spaces consistent with CalGreen and carpool/vanpool spaces consistent with the City's TDM ordinance)*
  6. Does not provide more parking than required *(The Project includes a long-term RV parking lot as a Project component. Because this is a primary function of the Project, the additional parking spaces would not influence increased VMT based beyond what is already calculated as part of the Project)*

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The proposed Project would also comply with the following applicable CAP Adaptation Actions for Extreme Heat, Drought, and Sea Level Rise and Flooding:

- The Project would implement Extreme Heat Adaptation Action #1 (Incorporate Cool Roofs, Cool Walls, Reflective Streets, Cool Surfaces, and Shade Canopies). Specifically, the Project would implement **PDF-6**, which requires the Project to incorporate shaded canopies with solar panels above the RV storage areas. Additionally, the Project would be built to the latest CALGreen and Title 24 standards and would include cool roofs and walls.
- The Project would implement Extreme Heat Adaptation Action #2 (Incorporate Tree Plantings and Expands Urban Forest Cover) Specifically, the Project would implement **PDF-7**, which requires the Project to incorporate drought-tolerant and native trees and plants around the perimeter of the Project Site, as applicable and feasible.
- Extreme Heat Adaptation Action #3 (Incorporate Bus Shelter Amenities) is only applicable to projects that propose the instillation of a new bus shelter. The Project does not propose the instillation of a new bus shelter; as such, this action is not applicable.
- Extreme Heat Adaptation Action #4 (Install Photocatalytic Tiles) would not be applicable to the Project. The proposed project proposes a self-storage facility for RVs with limited roofing space. Existing uses for proposed shade on site are for solar panels that offsets energy usage at this site and help contribute a reliable and renewable energy grid. Due to the limited surface area, especially roofing surface area for tiles, and limited market accessibility for photocatalytic tiles, the use of photocatalytic tiles is not feasible and this LB CAP Development Checklist requirement is not applicable.
- Extreme Heat Adaptation Action #5 (Include Urban Agriculture) would not be applicable to the Project. The proposed project proposes a self-storage facility for RVs that utilized the majority of the lot area. This site has limited unused surface area for urban agriculture production and daily users/operators that would benefit from agriculture production in the Industrial Zone. The intent of LB CAP Action AQ-2 is to incentivize urban agricultural practices and projects in the community and home gardens. Urban agriculture on this site would have limited benefit for the proposed and existing, adjacent industrial uses. This LB CAP Development Checklist requirement is not applicable as there is limited contextual benefit from the proposed uses and existing, adjacent uses.
- The Project would implement Extreme Heat Adaptation Action #6 (Use Electric Lawn and Garden Equipment, Outdoor Power Equipment, and Other Small Equipment). Specifically, **PDF-7**, requires that the Project Applicant, and any potential landscaping contracts for the subject property, shall utilize electric lawn and garden equipment, outdoor power equipment, and other small equipment or landscape management and site maintenance.
- The Project would implement Drought Adaptation Action #7 (Implement Water Use Efficiency and Water Conservation). Specifically, the Project would implement **PDF-8**, which requires the Project to include the installation of low flow sprinkler heads and drip, automated faucets, and high efficiency toilets, where feasible. Additionally, **PDF-8** requires the Project to plant native and drought tolerant vegetation with lower demands than required by Model Water Efficient Landscape Ordinance (MWELO).
- The Project would implement Drought Adaptation Action #8 (Incorporate Green Infrastructure and Green Streets) Specifically, the Project would implement **PDF-9**, which requires the Project to incorporate green infrastructure such as bioswales, or vegetated strips, where feasible.

- The Project would not implement Drought Adaptation Action #9 (Use Recycled Water and Greywater for Non-Potable Uses; includes Rainfall Capture) because it is infeasible. The Project cannot incorporate use of recycled water and/or greywater for non-potable uses because the Long Beach Utilities cannot provide non-potable water to the Project Site at this time.
- The Project would implement Drought Adaptation Action #10 (Comply with all City Floodplain and Sea Level Rise Regulations) The Project would comply with all City and Federal Emergency Management Act (FEMA) floodplain regulations as necessary to limit, elevate, or provide floodproofing standards in areas designated as vulnerable to flooding in order to minimize physical damage to development. This includes compliance with all applicable FEMA, California Building Code, City Building Code Chapter 18.40 and Floodplain Ordinance requirements. The Project would also comply with all applicable sea level rise regulations and ordinances, as applicable.
- The Project would implement Drought Adaptation Action #11 (Comply with the City's Current Stormwater Management Plan). The Project would comply with the City's Current Stormwater Management Plan and all related ordinances related to stormwater management and sea level rise scenarios evaluated by the City.
- Drought Adaptation Action #12 (Ensure that all critical infrastructure in the sea level rise vulnerability zone is elevated, relocated, or floodproofed) is only applicable to projects within the sea level rise (SLR) vulnerability zone; the Project is not within the SLR vulnerability zone. As such, this action is not applicable to the Project.
- Drought Adaptation Action #13 (Adapt Street Hardscapes and Waterfront Streets and Paths) is only applicable to projects related street improvements within the SLR vulnerability zone. The Project is not located in the SLR vulnerability zone; as such, this action is not applicable to the Project.

Additionally, Table 4.7-5, Project Potential to Conflict with the with the LB CAP, assesses whether the Project would conflict with the actions outlined in the LB CAP.

**TABLE 4.7-5  
PROJECT POTENTIAL TO CONFLICT WITH THE LB CAP**

Priority Mitigation Action	Project Potential to Conflict
<b>Building + Energy</b>	
BE-1: Provide access to renewably generated electricity	<b>Project would not conflict.</b> The Project would include solar on the canopy shade structures over the RV parking; additionally, the Project would install EV chargers and EV ready parking stalls consistent with Title 24. Additionally, <b>PDF-1</b> would involve the Project Applicant enrolling in SCE Green Power at the 100% rate, as available. As such, the Project would provide access to renewably generated electricity
BE-2: Increase use of solar power	<b>Project would not conflict.</b> The Project would include solar on the canopy shade structures over the RV parking. As such, the Project would increase the use of solar power within the City.
BE-3: Promote community solar and microgrids	<b>Not Applicable.</b> This action is directed at the City. While the Project would implement solar on the RV canopies, it would not promote community solar or microgrids.

**TABLE 4.7-5  
PROJECT POTENTIAL TO CONFLICT WITH THE LB CAP**

Priority Mitigation Action	Project Potential to Conflict
BE-4: Develop a residential and commercial energy assessment and benchmarking program	<b>Not Applicable.</b> This action is directed at the City. The Project would not develop a residential and commercial energy assessment and benchmarking program.
BE-5: Provide access to energy efficiency financing, rebates, and incentives for building owners	<b>Not Applicable.</b> This action is directed at the City. The Project does not include access to energy efficiency financing, rebates or incentives to individual business owners.
BE-6: Perform municipal energy and water audits	<b>Not Applicable.</b> This action is directed at the City. The Project is not a municipality that would perform energy or water audits.
BE-7: Update building codes to incentivize electric new residential and commercial buildings	<b>Not applicable.</b> This action is directed at the City. While the Project would be built according to the latest Title 24 standards and would construct an all-electric building, the Project would not update building codes to incentivize electric new residential and commercial buildings.
BE-8: Implement short-term measures to reduce emissions related to oil and gas extraction	<b>Not applicable.</b> This action is directed at the City. The Project does not involve the implementation of short-term measures to reduce emissions related to oil and gas extraction.
<b>Transportation</b>	
T-1: Increase the frequency, speed, connectivity, and safety of transit options	<b>Not Applicable.</b> The Project would not govern the frequency of transit provided to the Project area, and does not propose the installation or removal of any transit facilities.
T-2: Expand and improve pedestrian infrastructure citywide	<b>Project would not conflict.</b> Consistent with <b>PDF-4</b> , the Project would set aside an easement along the southern boundary of the site to provide future pedestrian access to the LA River. Should a trail be developed, this easement would provide a publicly accessible trail/trailhead and improve the walking environment within the City.
T-3: Increase bikeway infrastructure citywide	<b>Project would not conflict.</b> Consistent with <b>PDF-5</b> , the Project would provide 15 bicycle parking spaces along the front parking lot area, increasing bikeway infrastructure in the City. Additionally, consistent with <b>PDF-4</b> , the Project would set aside an easement along the southern boundary of the site to provide future pedestrian access to the LA River. Should a trail be developed, this easement would provide a publicly accessible trail/trailhead and improve the cycling environment within the City.
T-4: Implement the Port of Long Beach Clean Trucks Program	<b>Not Applicable.</b> The Project is not within the Port of Long Beach jurisdiction.
T-5: Develop an Electric Vehicle Infrastructure Master Plan	<b>Not Applicable.</b> This action is directed at the City. While the Project would install EV chargers and EV ready parking stalls consistent with Title 24, the Project would not develop an electric vehicle infrastructure master plan.
T-6: Increase employment and residential development along primary transit corridors	<b>Not Applicable.</b> While the Project would increase employment opportunities in the City, the Project is not located along a primary transit corridor.

**TABLE 4.7-5  
PROJECT POTENTIAL TO CONFLICT WITH THE LB CAP**

Priority Mitigation Action	Project Potential to Conflict
T-7: Update the Transportation Demand Management Ordinance	<b>Not Applicable.</b> This action is directed at the City; the Project would not update the City's Transportation Demand Management Ordinance.
T-8: Increase the density and mixing of land uses	<b>Would not conflict.</b> The Project site is currently undeveloped; the Project would introduce two new uses to the Project Site: RV Storage and Self-Storage facility.
T-9: Integrate SB 743 planning with the LB CAP process	<b>Not Applicable.</b> This action is directed at the City; the Project would not integrate SB 743 planning with the CAP process.
<b>Waste</b>	
W-1: Ensure compliance with state law requirements for multifamily and commercial property recycling programs	<b>Not Applicable.</b> This action is directed at the City. While the Project would comply with State law requirements for commercial property recycling programs, the Project does not involve multifamily uses.
W-2: Develop an organic waste collection program for City-serviced accounts	<b>Not Applicable.</b> This action is directed at the City. While the Project would implement <b>PDF-3</b> , the Project/Project Applicant does not have the authority to develop an organic waste collection program for City-serviced accounts.
W-3: Partner with private waste haulers to expand organic waste collection community-wide	<b>Not Applicable.</b> This action is directed at the City. While the Project would implement <b>PDF-3</b> , the Project/Project Applicant does not have the authority to expand organic waste collection community-wide.
W-4: Identify organic waste management options	<p><b>Project would not conflict.</b> In addition to compliance with all state and local requirements for composting and organic waste collection, including, Chapter 8.60 Solid Waste, Recycling, and Litter Prevention and Organic Waste Disposal Reduction in the City's Municipal code. The Project would also: implement <b>PDF-3</b>, which requires The Project to do the following:</p> <ul style="list-style-type: none"> <li>• Provide proper storage, collection, and loading of organics in a manner that is convenient and safe for all users of the building. Ensure there are sufficient sizes of collection containers for organics. Containers shall be kept clean, be clearly labeled, and co-located next to any other solid waste receptacles. The Project Applicant shall ensure sufficient pick up of collection containers to meet the needs of occupants and customers.</li> <li>• The Project Applicant shall ensure that the Project includes space for multi-stream collection containers for both recycling and organics in any location where a solid waste container is traditionally housed. This includes both outdoor collection containers serviced by a waste hauler or indoor collection containers utilized by occupants. The Project must provide educational material and training to occupants and customers in how to properly separate organics from all other solid waste and place</li> </ul>

**TABLE 4.7-5  
PROJECT POTENTIAL TO CONFLICT WITH THE LB CAP**

Priority Mitigation Action	Project Potential to Conflict
	<p>organics in a separate container designated for organics.</p> <ul style="list-style-type: none"> <li>• The Project Applicant shall provide adequate receptacles to ensure that all Project occupants and customers will separate compostables from all other refuse and place compostables in a separate container designated for composting.</li> <li>• The Project Applicant shall ensure containers are audited annually to ensure proper service levels and to check for contamination and report findings back to occupants within 30 days and to the City as requested.</li> <li>• The Project Applicant shall work with the Project's waste hauler to provide educational material to tenants and customers at least on an annual basis.</li> </ul> <p>The Project Applicant shall provide compliance data to the City as required for any current auditing program.</p>

In summary, a Project-specific analysis of GHG emissions has demonstrated that the Project's GHG emissions would be well below the SCAQMD brightline threshold, the Project would implement all applicable and feasible measures from the LB CAP Checklist, and the Project would not conflict with any of the mitigation actions outline in the LB CAP.

As such, the Project would not conflict with the abovementioned plans, policies, or regulations adopted for the purpose of reducing GHG emissions. As a result, the Project would result in a less than significant impact.

**Mitigation Measures**

No mitigation measures are required.

**Level of Significance After Mitigation**

No impact would occur and therefore no mitigation is required.

***Impact Comparison Summary:*** Impacts would be less than significant pursuant to this threshold. The Project would result in similar impacts when compared with the impact analysis in the previously prepared MND, which identified no impacts pursuant to this threshold.

**4.7.4 CUMULATIVE IMPACTS**

SCAQMD's policy with respect to cumulative impacts is that, where a project's direct impacts are less than significant, the project's GHG impacts would also be cumulatively less than significant, since GHG emissions are a cumulative issue (SCAQMD 2003). As shown in Tables 4.7-2 through 4.7-4 and discussed above, the Project's construction and operational emissions would be directly less than significant. Therefore, consistent with SCAQMD policy, the cumulative construction and operational impacts of the Project would also be less than significant.

**Mitigation Measures**

No mitigation measures are required.

**Level of Significance After Mitigation**

Cumulative Impacts: No impact would occur and therefore no mitigation is required.

## 4.7.5 REFERENCES

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