

IV. Environmental Impact Analysis

C. Greenhouse Gas Emissions

1. Introduction

This section of the Draft EIR provides a discussion of global climate change, existing regulations pertaining to global climate change, an inventory of the approximate greenhouse gas (GHG) emissions that would result from the Project, and an analysis of the significance of the impact of these GHGs. Calculation worksheets, assumptions, and model outputs used in the analysis are contained in Appendix D of this Draft EIR.

2. Environmental Setting

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHGs in the atmosphere. GHGs are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHGs keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of GHGs in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.¹

Scientists studying the particularly rapid rise in global temperatures have determined that human activity has resulted in increased emissions of GHGs, primarily from the burning of fossil fuels (from motor vehicle travel, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.), deforestation, agricultural activity,

¹ U.S. Environmental Protection Agency, *Climate Change: Basic Information*, www.epa.gov/climatechange/basics/, accessed December 1, 2016.

and the decomposition of solid waste. Scientists refer to the global warming context of the past century as the “enhanced greenhouse effect” to distinguish it from the natural greenhouse effect.²

Global GHG emissions due to human activities have grown since pre-industrial times. As reported by the United States Environmental Protection Agency (USEPA), global carbon emissions from fossil fuels increased by over 16 times between 1900 and 2008 and by about 1.5 times between 1990 and 2008. In addition, in the Global Carbon Budget 2014 report, published in September 2014, atmospheric carbon dioxide (CO₂) concentrations in 2013 were found to be 43 percent above the concentration at the start of the Industrial Revolution, and the present concentration is the highest during at least the last 800,000 years.³ Global increases in CO₂ concentrations are due primarily to fossil fuel use, with land use change providing another significant but smaller contribution. With regard to emissions of non-CO₂ GHG, these have also increased significantly since 1990.⁴ In particular, studies have concluded that it is very likely that the observed increase in methane (CH₄) concentration is predominantly due to agriculture and fossil fuel use.⁵

In August 2007, international climate talks held under the auspices of the United Nations Framework Convention on Climate Change (UNFCCC) led to the official recognition by the participating nations that global emissions of GHG must be reduced. According to the “Ad Hoc Working Group on Further Commitments of Annex I Parties under the Kyoto Protocol,” avoiding the most catastrophic events forecast by the United Nations Intergovernmental Panel on Climate Change (IPCC) would entail emissions reductions by industrialized countries in the range of 25 to 40 percent below 1990 levels. Because of the Kyoto Protocol’s Clean Development Mechanism, which gives industrialized countries credit for financing emission-reducing projects in developing countries, such an emissions goal in industrialized countries could ultimately spur efforts to cut emissions in developing countries as well.⁶

² Center for Climate and Energy Solutions, *Climate Change 101: Understanding and Responding to Global Climate Change*.

³ C. Le Quéré, et al., *Global Carbon Budget 2014*, (*Earth System Science Data*, 2015, doi:10.5194/essd-7-47-2015).

⁴ U.S. Environmental Protection Agency, *Global Greenhouse Gas Emissions Data*, www.epa.gov/climatechange/ghgemissions/global.html, accessed April 25, 2016.

⁵ U.S. Environmental Protection Agency, *Atmospheric Concentrations of Greenhouse Gas*, updated June 2015.

⁶ United Nations Framework Convention on Climate Change, *Press Release—Vienna UN Conference Shows Consensus on Key Building Blocks for Effective International Response to Climate Change*, August 31, 2007.

With regard to the adverse effects of global warming, as reported by SCAG, “Global warming poses a serious threat to the economic well-being, public health and natural environment in southern California and beyond. The potential adverse impacts of global warming include, among others, a reduction in the quantity and quality of water supply, a rise in sea level, damage to marine and other ecosystems, and an increase in the incidences of infectious diseases. Over the past few decades, energy intensity of the national and state economy has been declining due to the shift to a more service-oriented economy. California ranked fifth lowest among the states in CO₂ emissions from fossil fuel consumption per unit of Gross State Product. However, in terms of total CO₂ emissions, California is second only to Texas in the nation and is the 12th largest source of climate change emissions in the world, exceeding most nations. The SCAG region, with close to half of the state’s population and economic activities, is also a major contributor to the global warming problem.”⁷

a. GHG Background

GHGs include CO₂, CH₄, nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃).⁸ Carbon dioxide is the most abundant GHG. Other GHGs are less abundant, but have higher global warming potential than CO₂. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions. A general description of the GHGs is provided in Table IV.C-1 on page IV.C-4.

Global Warming Potentials (GWPs) are one type of simplified index based upon radiative properties used to estimate the potential future impacts of emissions of different gases upon the climate system. GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO₂, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO₂. The larger the GWP, the more that a given gas warms the Earth compared to CO₂ over that time period. A summary of the atmospheric lifetime⁹ and GWP of selected gases is presented in Table IV.C-2 on page IV.C-6. As indicated below, GWPs range from 1 to 22,800.

⁷ Southern California Association of Governments, *The State of the Region—Measuring Regional Progress*, December 2006, p. 121.

⁸ As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.

⁹ Atmospheric lifetime is defined as the time required to turn over the global Atmospheric burden. Source: Intergovernmental Panel on Climate Change, *IPCC Third Assessment Report: Climate Change 2001 (TAR)*, Chapter 4: Atmospheric Chemistry and Greenhouse Gases, 2001, p. 247.

Table IV.C-1
Description of Identified Greenhouse Gases^a

Greenhouse Gas	General Description
Carbon Dioxide (CO₂)	An odorless, colorless GHG, which has both natural and anthropogenic sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (human caused) sources of CO ₂ are burning coal, oil, natural gas, and wood.
Methane (CH₄)	A flammable gas and is the main component of natural gas. When one molecule of CH ₄ is burned in the presence of oxygen, one molecule of CO ₂ and two molecules of water are released. A natural source of CH ₄ is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH ₄ , which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
Nitrous Oxide (N₂O)	A colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N ₂ O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
Hydrofluorocarbons (HFCs)	Chlorofluorocarbons (CFCs) are gases formed synthetically by replacing all hydrogen atoms in CH ₄ or ethane (C ₂ H ₆) with chlorine and/or fluorine atoms. CFCs are non-toxic, non-flammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987. HFCs are synthetic man-made chemicals that are used as a substitute for CFCs as refrigerants. HFCs deplete stratospheric ozone, but to a much lesser extent than CFCs.
Perfluorocarbons (PFCs)	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semi-conductor manufacturing.
Sulfur Hexafluoride (SF₆)	An inorganic, odorless, colorless, non-toxic, and non-flammable gas. SF ₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semi-conductor manufacturing, and as a tracer gas for leak detection.
Nitrogen Trifluoride (NF₃)	An inorganic, non-toxic, odorless, non-flammable gas. NF ₃ is used in the manufacture of semi-conductors, as an oxidizer of high energy fuels, for the preparation of tetrafluorohydrazine, as an etchant gas in the electronic industry, and as a fluorine source in high power chemical lasers.
<p>^a GHGs identified in this table are ones identified in the Kyoto Protocol and other synthetic gases recently added to the IPCC's Fifth Assessment Report.</p>	

Table IV.C-1 (Continued)
Description of Identified Greenhouse Gases^a

Greenhouse Gas	General Description
<p><i>Source: Association of Environmental Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007; U.S. Environmental Protection Agency, Acute Exposure Guideline Levels (AEGs) for Nitrogen Trifluoride, Interim, 2009.</i></p>	

b. Projected Impacts of Global Warming in California

According to the 2006 California Climate Action Team (CAT) Report, temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California associated with a projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming. If emissions from GHGs are not reduced substantially, the warming increase could have the following consequences in California:¹⁰

- The Sierra snowpack would decline between 70 and 90 percent, threatening California's water supply;
- Attainment of air quality standards would be impeded by increasing emissions, accelerating chemical processes, and raising inversion temperatures during stagnation episodes;
- Erosion of California's coastlines would increase, as well as sea water intrusion;
- Pest infestation and vulnerability to fires of the state's forests would increase; and
- Rising temperatures would increase power demand, especially in the summer season.

With regard to public health, as reported by the Center for Health and the Global Environment at the Harvard Medical School, the following are examples of how climate change can affect cardio-respiratory disease: (1) pollen is increased by higher levels of atmospheric CO₂; (2) heat waves can result in temperature inversions, leading to trapped masses or unhealthy air contaminants by smog, particulates, and other pollutants; and

¹⁰ California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.*

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

Gas	Atmospheric Lifetime (years)	Global Warming Potential (100-year time horizon)
Carbon Dioxide (CO ₂)	50–200	1
Methane (CH ₄)	12 (+/-3)	25
Nitrous Oxide (N ₂ O)	114	298
HFC-23: Fluoroform (CHF ₃)	270	14,800
HFC-134a: 1,1,1,2-Tetrafluoroethane (CH ₂ FCF ₃)	14	1,430
HFC-152a: 1,1-Difluoroethane (C ₂ H ₄ F ₂)	1.4	124
PFC-14: Tetrafluoromethane (CF ₄)	50,000	7,390
PFC-116: Hexafluoroethane (C ₂ F ₆)	10,000	12,200
Sulfur Hexafluoride (SF ₆)	3,200	22,800
Nitrogen Trifluoride (NF ₃)	740	17,200
<p><i>Source: IPCC, Climate Change 2007: Working Group I: The Physical Science Basis, Direct Global Warming Potentials, www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html, accessed May 10, 2016.</i></p>		

(3) the incidence of forest fires is increased by drought secondary to climate change and to the lack of spring runoff from reduced winter snows. These fires can create smoke and haze, which can settle over urban populations causing acute and exacerbating chronic respiratory illness.¹¹

c. Regulatory Framework

In response to growing scientific and political concern with global climate change, federal and state entities have adopted a series of laws to reduce emissions of GHGs to the atmosphere.

(1) Federal

(a) Federal Clean Air Act

The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO₂ and other GHGs are pollutants under the federal

¹¹ Paul R. Epstein, et al., *Urban Indicators of Climate Change, Report from the Center for Health and the Global Environment, (Harvard Medical School and the Boston Public Health Commission, August 2003), unpaginated.*

Clean Air Act (CAA), which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. The U.S. Supreme Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that the USEPA could avoid taking action if it found that GHGs do not contribute to climate change or if it offered a “reasonable explanation” for not determining that GHGs contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHGs contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171. The USEPA stated that high atmospheric levels of GHGs “are the unambiguous result of human emissions, and are very likely the cause of the observed increase in average temperatures and other climatic changes.” The USEPA further found that “atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act.” The findings were signed by the USEPA Administrator on December 7, 2009. The final findings were published in the Federal Register on December 15, 2009. The final rule was effective on January 14, 2010.¹² While these findings alone do not impose any requirements on industry or other entities, this action is a prerequisite to regulatory actions by the USEPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

On July 20, 2011, the USEPA published its final rule deferring GHG permitting requirements for CO₂ emission from biomass-fired and other biogenic sources until July 21, 2014. Environmental groups have challenged the deferral. In September 2011, USEPA released an “Accounting Framework for Biogenic CO₂ Emissions from Stationary Sources,” which analyzes accounting methodologies and suggests an implementation for biogenic CO₂ emitted from stationary sources.

On April 4, 2012, USEPA published a proposed rule to establish, for the first time, a new source performance standard for GHG emissions. Under the proposed rule, new fossil fuel-fired electric generating units larger than 25 megawatts (MW) are required to limit emissions to 1,000 pounds of CO₂ per MW-hour (CO₂/MWh) on an average annual basis, subject to certain exceptions.

On April 17, 2012, the USEPA issued emission rules for oil production and natural gas production and processing operations, which are required by the CAA under Title 40 of the Code of Federal Regulations, Parts 60 and 63. The final rules include the first federal

¹² U.S. Environmental Protection Agency, *Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, Final Rule*.

air standards for natural gas wells that are hydraulically fractured, along with requirements for several other sources of pollution in the oil and gas industry that currently are not regulated at the federal level.¹³

(b) Corporate Average Fuel Economy (CAFE) Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, the George W. Bush Administration issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards are projected to achieve 163 grams/mile of CO₂ in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if the standards were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021, and NHTSA intends to set standards for model years 2022–2025 in a future rulemaking.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO₂ emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles. According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.¹⁴

¹³ *U.S. Environmental Protection Agency, Oil and Natural Gas Sector: New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants Reviews, Final Rule.*

¹⁴ *The emission reductions attributable to the regulations for medium- and heavy-duty trucks were not included in the Project's emissions inventory due to the difficulty in quantifying the reductions. Excluding these reductions results in a more conservative (i.e., higher) estimate of emissions for the Project.*

(c) *Energy Independence and Security Act*

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

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

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of “green jobs.”¹⁵

(2) State

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

Executive Order S-3-05, issued in June 2005, established GHG emissions targets for the State, as well as a process to ensure the targets are met. The order directed the Secretary for the California Environmental Protection Agency (CalEPA) to report every two years on the state’s progress toward meeting the Governor’s GHG emission reduction targets. As a result of this executive order, the California Climate Action Team (CAT), led by the Secretary of CalEPA, was formed. The CAT is made up of representatives from a number of state agencies and was formed to implement global warming emission reduction programs and reporting on the progress made toward meeting statewide targets

¹⁵ A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.

established under the Executive Order. The CAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.¹⁶ The statewide GHG targets are as follows:

- By 2010, reduce GHGs to 2000 emission levels;¹⁷
- By 2020, reduce GHGs to 1990 emission levels; and
- By 2050, reduce GHGs to 80 percent below 1990 levels.

However, in adopting the California Global Warming Solutions Act of 2006 (also known as AB 32), discussed below, the Legislature has not yet adopted the 2050 horizon-year goal from Executive Order No. S-3-05.

The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. “Intelligent transportation systems” is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.¹⁸

(b) California Global Warming Solutions Act of 2006 (AB 32)

The California Global Warming Solutions Act of 2006 (also known as AB 32) commits the state to achieving the following:

- By 2010, reduce to 2000 GHG emission levels;¹⁹ and

¹⁶ California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006.

¹⁷ *The 2010 target to reduce GHG emissions to 2000 levels was not met. Source: Rubin, Thomas A., “Does California Really Need Major Land Use and Transportation Changes to Meet Greenhouse Gas Emissions Targets?” July 3, 2013.*

¹⁸ California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, p. 58.

¹⁹ *The 2010 target to reduce GHG emissions to 2000 levels was not met. Source: Rubin, Thomas A., “Does California Really Need Major Land Use and Transportation Changes to Meet Greenhouse Gas Emissions Targets?” July 3, 2013.*

- By 2020, reduce to 1990 levels.

To achieve these goals, which are consistent with the California CAT GHG targets for 2010 and 2020, AB 32 mandates that the California Air Resources Board (CARB) establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. In order to achieve the reduction targets, AB 32 requires CARB to adopt rules and regulations in an open public process that achieve the maximum technologically feasible and cost-effective GHG reductions.²⁰

(c) Climate Change Scoping Plan

In 2008, CARB approved a *Climate Change Scoping Plan* as required by AB 32.²¹ The *Climate Change Scoping Plan* proposes a “comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.”²² The *Climate Change Scoping Plan* has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program.

The *Climate Change Scoping Plan* calls for a “coordinated set of solutions” to address all major categories of GHG emissions. Transportation emissions will be addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations will be encouraged and, sometimes, required to use energy more efficiently. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard.²³ Additionally, the *Climate Change Scoping Plan* emphasizes

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

²¹ CARB, *Climate Change Scoping Plan: A Framework for Change*, December 2008.

²² CARB, *Climate Change Scoping Plan: A Framework for Change*, December 2008.

²³ For a discussion of Renewables Portfolio Standard, refer to subsection 2(f), *California Renewables Portfolio Standard*.

opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicates that substantial savings of electricity and natural gas will be accomplished through “improving energy efficiency by 25 percent.”

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

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

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

- The importance of supporting the Department of Water Resources’ work to implement the Governor’s objective to reduce per capita water use by 20 percent by 2020. Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The *Climate Change Scoping Plan* notes that water use requires significant amounts of energy, including approximately one-fifth of statewide electricity.
- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California has to make to return to the 1990 emissions level by 2020 as required by AB 32. The “no implementation of emission reduction measures” (NIERM) scenario is also more commonly known as “business-as-usual” or BAU. CARB defined the BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the *Climate Change Scoping Plan*. For example, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. In the *Climate Change Scoping Plan*, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent from the otherwise

projected BAU 2020 emissions level (i.e., those emissions that would occur in 2020, absent GHG-reducing laws and regulations).²⁴

Subsequent to adoption of the *Climate Change Scoping Plan*, a lawsuit was filed challenging CARB's approval of the *Climate Change Scoping Plan Functional Equivalent Document (FED to the Climate Change Scoping Plan)*. On May 20, 2011 (Case No. CPF-09-509562). The Court found that the environmental analysis of the alternatives in the *FED to the Climate Change Scoping Plan* was not sufficient under the California Environmental Quality Act (CEQA). CARB staff prepared a revised and expanded environmental analysis of the alternatives, and the *Supplemental FED to the Climate Change Scoping Plan* was approved on August 24, 2011 (*Supplemental FED*). As part of the *Supplemental FED*, CARB updated the projected 2020 BAU emissions inventory based on the economic downturn, commonly known as the "Great Recession," and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. CARB staff derived the updated emissions estimates by projecting emissions growth, by sector, from the state's average emissions from 2006 through 2008. Specific emission reduction measures included are the million-solar-roofs program, the AB 1493 (Pavley I) motor vehicle GHG emission standards, and the LCFS.²⁵ In addition, CARB also factored in reductions associated with 33-percent Renewable Energy Portfolio Standard (RPS) for electricity generation. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 percent (down from 28.5 percent originally projected in 2006) from BAU conditions. When the 2020 emissions level projection also was updated to account for newly implemented regulatory measures discussed above, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16 percent (further reduced from the 28.5 percent) from the BAU conditions.^{26,27}

²⁴ CARB, *Climate Change Scoping Plan: A Framework for Change*, December 2008, p. 12.

²⁵ Pavley I are the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 to 2016. Pavley I could potentially result in 27.7 million metric tonnes CO₂e reduction in 2020. Pavley II will cover model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tons CO₂e.

²⁶ CARB, *Supplement to the AB 32 Scoping Plan FED*, Table 1.2-2.

²⁷ The emissions and reductions estimates found in the *Supplemental FED to the Climate Change Scoping Plan* fully replace the estimates published in the 2008 *Climate Change Scoping Plan*. See CARB, *Resolution 11-27 (Aug. 24, 2011) (setting aside approval of 2008 Climate Change Scoping Plan and associated emissions forecasts, and approving the Supplemental FED)*. The estimates in the 2008 document are 596 million metric tons CO₂e under 2020 BAU and a required reduction of 169 million metric tons CO₂e (28.4 percent).

Most recently, in 2014, CARB adopted the *First Update to the Climate Change Scoping Plan: Building on the Framework* (First Update).²⁸ The stated purpose of the First Update is to “highlight... California’s success to date in reducing its GHG emissions and lay... the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.”²⁹ The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state meets the expected benefits of existing policy goals.³⁰

In conjunction with the First Update, CARB identified “six key focus areas comprising major components of the state’s economy to evaluate and describe the larger transformative actions that will be needed to meet the state’s more expansive emission reduction needs by 2050.”³¹ Those six areas are: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The First Update identifies key recommended actions for each sector that will facilitate achievement of the 2050 reduction target.

The First Update discusses ways to achieve emission reductions in the aforementioned six areas. For example, new residential and commercial building energy efficiency improvements contributing towards zero net energy buildings are an element of meeting mid-term and long-term GHG reduction goals. The First Update also expresses CARB’s commitment to working with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to facilitate further achievements in building energy efficiency. In addition, based on CARB’s research efforts, “technologies [are] needed to reduce emissions through 2050.”³² Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

²⁸ *Health & Safety Code Section 38561(h) requires CARB to update the Scoping Plan every five years.*

²⁹ *CARB, First Update to the Climate Change Scoping Plan, May 2014, p. 4.*

³⁰ *CARB, First Update to the Climate Change Scoping Plan, May 2014, p. 34.*

³¹ *CARB, First Update to the Climate Change Scoping Plan, May 2014, p. 6.*

³² *CARB, First Update to the Climate Change Scoping Plan, May 2014, p. 32.*

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

Executive Order B-30-15, issued in April 2015, established a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. Consistent with this new policy goal, reducing GHG emissions by 40 percent below 1990 levels in 2030 and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05) aligns with scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius.³³

(e) *Senate Bill 32*

Senate Bill (SB) 32, signed September 8, 2016, updates AB 32 (the Global Warming Solutions Act) to include an emissions reductions goal for the year 2030. Specifically, SB 32 would require the state board to ensure that statewide GHG are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

(f) *Cap-and-Trade Program*

The *Climate Change Scoping Plan* identifies a cap-and-trade program as one of the strategies for California to reduce GHG emissions. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap will be able to trade permits to emit GHGs within the overall limit. According to CARB, a cap-and-trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020.³⁴

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed “covered entities”). “Covered entities” subject to the Cap-and-Trade Program are sources that emit more than 25,000 metric tons CO₂e (MTCO₂e) per year. Triggering of the 25,000 MTCO₂e per year “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).

³³ CARB, *Frequently Asked Questions, 2030 Carbon Target and Adaptation*.

³⁴ *With continuation of the Cap-and-Trade Program, the State can achieve a 40-percent reduction target by 2030.*

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or in part (if eligible) and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender an allowance for each metric ton CO₂e of GHG they emit.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2020 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a cumulative basis. As summarized by CARB in the First Update:

The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.

For example, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a commensurate reduction in GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate:

The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the “capped sectors.” Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price

incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap.³⁵ [...]

[T]he Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions.³⁶

Overall, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the state's emissions forecasts and the effectiveness of direct regulatory measures.

As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions.³⁷

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the Program's first compliance period. While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, they did not have a compliance obligation (i.e., they were not fully regulated) until 2015. Furthermore, the Cap-and-Trade Program also covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle-miles traveled (VMT) are covered by the Cap-and-Trade Program.

³⁵ CARB, *First Update to the Climate Change Scoping Plan*, May 2014, p. 88.

³⁶ CARB, *First Update to the Climate Change Scoping Plan*, May 2014, pp. 86–87.

³⁷ Center for Climate and Energy Solutions, *California Cap and Trade*, www.c2es.org/us-states-regions/key-legislation/california-cap-trade, accessed May 19, 2016.

(g) *Energy-Related Sources*

(i) *California Renewables Portfolio Standard*

The California Renewables Portfolio Standard (RPS) program (passed in 2002 under Senate Bill [SB] 1078) requires that 20 percent of the available energy supplies are from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20 percent mandate to 2010. These mandates apply directly to investor-owned utilities. On April 12, 2011, California Governor Jerry Brown signed into law SB 2X, which modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California SB 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016. In 2011, the Los Angeles Department of Water and Power (LADWP) indicated that 20 percent of its electricity came from renewable resources in Year 2010. Therefore, under SB 2X, LADWP will increase its electricity from renewable resources by an additional 13 percent to comply with the RPS of 33 percent.³⁸

(ii) *California Senate Bill 1368 (SB 1368)*

SB 1368, a companion bill to AB 32, requires the CPUC and the CEC to establish GHG emission performance standards for electricity generation. These standards will also generally apply to power that is generated outside of California and imported into the state. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB 32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation serving California consumers to be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO₂ per MWh. Furthermore, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of CO₂ per MWh (see CEC Order No. 07-523-7).

(iii) *Senate Bill 350*

Senate Bill (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 Executive Order B-30-15. The objectives of SB 350 are: (1) to increase the procurement of our electricity from renewable sources from 33 percent to 50 percent; and (2) to double the

³⁸ LADWP Newsroom, "Mayor Villaraigosa Announces Historic Renewable Energy Achievement," January 13, 2011.

energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.³⁹

(h) *Mobile Sources*

(i) *California Assembly Bill 1493 (Pavley I)*

AB 1493, passed in 2002, requires the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the state. CARB originally approved regulations to reduce GHGs from passenger vehicles in September 2004, with the regulations to take effect in 2009. On September 24, 2009, CARB adopted amendments to these “Pavley” regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016.⁴⁰ Although setting emission standards on automobiles is solely the responsibility of the USEPA, the federal CAA allows California to set state-specific emission standards on automobiles if the state first obtains a waiver from the USEPA. The USEPA granted California that waiver on July 1, 2009. A comparison between the AB 1493 standards and the Federal CAFE standards was completed by CARB and the analysis determined that California emission standards are 16 percent more stringent through the 2016 model year and 18 percent more stringent for 2020 model year.⁴¹ California is also committed to further strengthening these standards beginning with 2020 model year vehicles to obtain a 47 percent GHG reduction in comparison to the 2009 model year.

(ii) *Executive Order S-1-07 (California Low Carbon Fuel Standard)*

Executive Order S-1-07, the LCFS (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California’s transportation fuels by 2020. Regulatory proceedings and implementation of the LCFS have been directed to CARB. The LCFS has been identified by CARB as a discrete early action item in the adopted *Climate Change Scoping Plan*. CARB expects the LCFS to achieve the minimum 10-percent reduction goal; however, many of the early action items outlined in the *Climate Change Scoping Plan* work in tandem with one another. To avoid the potential for double-counting emission reductions associated with AB 1493, the *Climate Change Scoping Plan* has modified the aggregate reduction expected from the LCFS to 9.1 percent. In

³⁹ *Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, Ch. 547.*

⁴⁰ *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493, www.arb.ca.gov/cc/ccms/ccms.htm, accessed May 25, 2016.*

⁴¹ *California Air Resources Board, “Comparison of Greenhouse Gas Reductions for all Fifty United States under CAFE Standards and ARB Regulations Adopted Pursuant to AB 1493,” January 23, 2008.*

accordance with the *Climate Change Scoping Plan*, this analysis incorporates the modified reduction potential for the LCFS. CARB released a draft version of the LCFS in October 2008. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the LCFS became effective on the same day.

(iii) Advanced Clean Cars Regulations

In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for model years 2017–2025. 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, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.

(iv) California Senate Bill 375 (SB 375)

Acknowledging the relationship between land use planning and transportation sector GHG emissions, SB 375 was passed by the State Assembly on August 25, 2008, and signed by the Governor on September 30, 2008. This legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32. Reductions in GHG emissions would be achieved by, for example, locating employment opportunities close to transit. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduce passenger vehicle miles traveled (VMT) and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. If the SCS is unable to achieve the regional GHG emissions reduction targets, then the MPO is required to prepare an alternative planning strategy that shows how the GHG emissions reduction target could be achieved through alternative development patterns, infrastructure, and/or transportation measures.

(i) Building Standards

(i) California Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608)

The 2014 Appliance Efficiency Regulations, adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost-effective measures, to promote the use of energy- and water-efficient appliances.

(ii) California Building Energy Efficiency Standards (Title 24, Part 6)

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, found in Title 24, Part 6 of the California Code of Regulations (CCR) and

commonly referred to as “Title 24,” were established in 1978 in response to a legislative mandate to reduce California’s energy consumption. Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.⁴²

An update to Title 24 was adopted by the CEC on April 23, 2008. The 2008 Title 24 standards applied to building permits for which an application was submitted on or after January 1, 2010. The CEC adopted the changes made in 2008 to the Building Energy Efficiency Standards to respond to the mandates of AB 32. It also responded to the State’s policy that energy efficiency should be prioritized in meeting California’s energy needs. The 2013 Title 24 standards are the current standards, which became effective July 1, 2014.⁴³ However, more recently, the CEC adopted the 2016 Title 24 standards, which become effective on January 1, 2017, and will be applicable to the Project.⁴⁴ The 2016 standards will continue to improve upon the current 2013 Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.⁴⁵

(iii) California Green Building Standards (Title 24, Part 11)

The California Green Building Standards Code, which is Part 11 of the CCR, is commonly referred to as the CALGreen Code. The 2008 edition, the first edition of the CALGreen Code, contained only voluntary standards. The 2010 CALGreen Code is a code with mandatory requirements for state-regulated buildings and structures throughout California beginning on January 1, 2011. The 2010 CALGreen Code contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The code provides for design options, allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verification that all building systems, such as heating and cooling equipment and lighting systems, are functioning at their maximum efficiency.

⁴² See California Energy Commission, 2016 Building Energy Efficiency Standards, www.energy.ca.gov/title24/2016standards/, accessed May 25, 2016.

⁴³ California Building Standards Commission, Building Standards Information Bulletin 13-07.

⁴⁴ See California Energy Commission, 2016 Building Energy Efficiency Standards, www.energy.ca.gov/title24/2016standards/, accessed May 25, 2016.

⁴⁵ See California Energy Commission, 2016 Building Energy Efficiency Standards, www.energy.ca.gov/title24/2016standards/, accessed May 25, 2016.

The most recent updates are codified in the 2013 CALGreen Code, which went into effect on July 1, 2014. There are a number of important updates in the 2013 code, such as: (1) an extensive update of California's Energy Code; (2) updated CALGreen requirements for non-residential building alterations and additions; and (3) new plumbing code provisions pertaining to greywater and rainwater catchments. The most recent update that includes new *residential* measures for electric vehicle charging became effective July 1, 2015.

(j) California Senate Bill 97 (SB 97)

SB 97, passed in August 2007, is designed to work in conjunction with CEQA and AB 32. SB 97 requires OPR to prepare and develop guidelines for the mitigation of GHG emissions or the effects thereof, including, but not limited to, the effects associated with transportation and energy consumption. The Draft Guidelines Amendments for Greenhouse Gas Emissions ("Guidelines Amendments") were adopted on December 30, 2009, and address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment.

However, neither a threshold of significance nor any specific mitigation measures are included or provided in the Guidelines Amendments.⁴⁶ The Guidelines Amendments require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency whether to: (1) use a model or methodology to quantify greenhouse gas emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, the Guidelines Amendments identify three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and

⁴⁶ See 14 Cal. Code Regs. Sections 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects) and 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.⁴⁷

The administrative record for the Guidelines Amendments also clarifies “that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act’s requirements for cumulative impact analysis.”⁴⁸

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to AB 32. Senate Bill 97 applies retroactively to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document required by CEQA, which has not been finalized.

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

The California Supreme Court’s decision published on November 30, 2015, in the *Center for Biological Diversity v. California Department of Fish and Wildlife* (Case No. 217763) (also known as the “Newhall Ranch Case”) reviewed the methodology used to analyze GHG emissions in an EIR prepared for a project that proposed 20,885 dwelling units with 58,000 residents on 12,000 acres of undeveloped land in a rural area of the City of Santa Clara. The EIR analyzed whether the project would impede with the state’s compliance with statutory emissions reduction mandate established by Assembly Bill 32 (AB 32) Scoping Plan by using the BAU approach. The BAU approach used in the Newhall EIR calculated the reduction in GHG emissions accounting for project features and mitigation measures and compared the resulting reduction in emissions to the statewide level of reduction included in the *Climate Change Scoping Plan*. The Court did not invalidate the BAU approach entirely but did hold that “the Scoping Plan nowhere related that *statewide* level of reduction effort to the percentage of reduction that would or should be required from *individual projects* and nothing DFW or Newhall have cited in the administrative record indicates the required percentage reduction from business as usual is the same for an individual project as for the entire state population and economy.”⁴⁹ In other words, the reduction from BAU could be different within different parts of the state.

⁴⁷ 14 Cal. Code Regs. Section 15064.4(b).

⁴⁸ Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

⁴⁹ *Center for Biological Diversity v. California Department of Fish and Wildlife* (Case No. 217763), p. 20.

The California Supreme Court suggested regulatory consistency as a potential “pathway to compliance,” by stating that a lead agency might assess consistency with AB 32’s goal in whole or in part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities. The Court recognized that to the extent a project’s design features comply with or exceed the regulations outlined in the *Climate Change Scoping Plan*, and adopted by CARB or other state agencies, a lead agency could appropriately rely on their use as showing compliance with performance-based standards adopted to fulfill a statewide plan for the reduction or mitigation of GHG emissions. This approach is consistent with CEQA Guidelines Section 15064, which provides that a determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions. Importantly, the Court also suggested “A lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions,”

(l) Assembly Bill 900 (AB 900)

In September 2011, Governor Jerry Brown signed AB 900, which required the Governor to establish procedures for applying for streamlined environmental review under CEQA for projects that meet certain requirements. OPR has provided approved guidelines for submitting applications for streamlined environmental review pursuant to AB 900. With respect to GHG emissions, a project must demonstrate that it would not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with Public Resources Code (PRC) Section 21183(c). On August 26, 2016, SB 734 was passed, which extends the sunset date of AB 900 until January 1, 2019.⁵⁰ For purposes of PRC Section 21183(c), the following process applies:

1. The applicant shall submit electronically to AB900ARBsubmittals@arb.ca.gov a proposed methodology for quantifying the project’s net additional GHG emissions. CARB will review and comment on the methodology, at its discretion, within 30 days of submission.
2. At the same time, the applicant shall submit to AB900ARBsubmittals@arb.ca.gov documentation that the project does not result in any net additional GHG emissions. The documentation must at least quantify:

⁵⁰ *California Legislative Information, Senate Bill No. 734, Environmental Quality: Jobs and Economic Improvement Through Environmental Leadership Act of 2011, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201520160SB734, accessed November 30, 2016.*

- a. Both direct and indirect GHG emissions associated with the project's construction and operation, including emissions from the project's projected energy use and transportation-related emissions; and
 - b. The net emissions of the project after accounting for any mitigation measures that will be monitored and enforced consistent with PRC Section 21183(d).
3. Within 60 days of receiving the documentation (in 2. above), CARB will determine whether the condition specified in PRC Section 21183(c) has been met or, if more time is needed, notify the applicant of the expected completion date.
 4. CARB will determine and report to the Governor in writing that a project does not result in any net additional emissions of GHG if the project demonstrates through a combination of Project Design Features, compliance with (or exceeding minimum requirements of) existing regulations, and mitigation that it would result in zero additional GHG emissions.

(3) Regional

(a) South Coast Air Quality Management District

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

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

In 2008, SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds.⁵¹ Within its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 MTCO₂e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.⁵² The aforementioned Working Group has been inactive since 2011.

(b) Southern California Association of Governments

On April 4, 2012, the Regional Council of the Southern California Association of Governments (SCAG) adopted the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future (2012–2035 RTP/SCS). Within the RTP, the SCS demonstrates the region’s ability to attain and exceed the GHG emission-reduction targets set forth by CARB. The SCS outlines the region’s plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The SCS focuses the majority of new housing and job growth in high-quality transit areas (HQTA) and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures. Finally, the 2012–2035 RTP/SCS fully integrates the two subregional SCSs prepared by the Gateway Cities and Orange County Council of Governments. On June 4, 2012, CARB accepted SCAG’s quantification of GHG emission reductions from the 2012–2035 RTP/SCS and determined that the 2012–2035 RTP/SCS would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by CARB.⁵³

⁵¹ SCAQMD, *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008, Attachment E.*

⁵² SCAQMD, *Greenhouse Gases (GHG) CEQA Significance Thresholds*, www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds, accessed November 30, 2016.

⁵³ CARB, *Executive Order G-12-039.*

Building off of the considerable progress made under SCAG's 2012–2035 RTP/SCS, SCAG recently adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS).⁵⁴ The 2016–2040 RTP/SCS reaffirms the land use policies that were incorporated into the 2012–2035 RTP/SCS. These foundational policies, which guided the development of the 2016–2040 RTP/SCS's strategies for land use, include the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;⁵⁵
- Develop “Complete Communities”;
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

The 2016–2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the Updated Plan draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016–2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

The 2016–2040 RTP/SCS states that in 2012 the SCAG region was home to about 18.3 million people and currently includes approximately 5.9 million homes and

⁵⁴ SCAG, *Final 2016 RTP/SCS*, April 2016.

⁵⁵ *Complete language: “Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment.” A more detailed description of these strategies and policies can be found on pp. 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.*

7.4 million jobs. By 2040, the integrated growth forecast projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. HQTAs will account for 3 percent of regional total land, but are projected to accommodate 46 percent and 55 percent of future household and employment growth respectively between 2012 and 2040. The 2016–2040 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s HQTAs. HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.

The 2012–2035 RTP/SCS set a target of 9 percent per capita reduction in transportation GHG emissions by 2020 and a 16 percent per capita reduction by 2035 compared to the 2005 level on a per capita basis.⁵⁶ The 2016–2040 RTP/SCS is expected to reduce per capita transportation emissions by eight percent by 2020 and 18 percent by 2035. This level of reduction would meet and exceed the region’s GHG targets set by CARB of 8 percent per capita by 2020 and 13 percent per capita by 2035.⁵⁷ Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS’s GHG emission reduction trajectory shows that even more GHG emission reductions are projected for 2040.⁵⁸ The 2016–2040 RTP/SCS would result in an estimated 21 percent decrease in per capita GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21 percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]), the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state’s GHG emission reduction goals.

(4) Local

(a) *City of Los Angeles Green LA Action Plan*

The City of Los Angeles began addressing the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (“LA Green Plan”) in 2007. This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City of Los Angeles is committed to the goal

⁵⁶ SCAG, *2012–2035 RTP/SCS, Executive Summary*, adopted April 2012.

⁵⁷ SCAG, *2016–2040 RTP/SCS, Executive Summary*, p. 8.

⁵⁸ SCAG, *Program Environmental Impact Report for 2016–2040, RTP/SCS, December 2015, Figure 3.8.4-1*.

of reducing emissions of CO₂ to 35 percent below 1990 levels by year 2030. To achieve this, the City has been implementing the following:

- Increasing the generation of renewable energy;
- Improving energy conservation and efficiency; and
- Changing transportation and land use patterns to reduce dependence on automobiles.⁵⁹

(b) City of Los Angeles Green Building Code

On December 15, 2011, the Los Angeles City Council approved Ordinance No. 181,481, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various provisions of the 2010 CALGreen Code. On December 17, 2013, the Los Angeles City Council approved Ordinance No. 182,849, which further amended Chapter IX of the LAMC, by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2013 CALGreen Code. Projects filed on or after January 1, 2014, must comply with the provisions of the Los Angeles Green Building Code. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) non-residential and high-rise residential buildings; and (3) additions and alterations to non-residential and high-rise residential buildings.

(c) City of Los Angeles General Plan

The City of Los Angeles does not have a General Plan Element specific to Global Warming and GHG emissions or include any goals, objectives, or policies specific to global warming and GHG emissions. However, the following five goals from the Air Quality Element of the City of Los Angeles General Plan would also serve to reduce GHG emissions:

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

⁵⁹ *City of Los Angeles, Green LA, An Action Plan to Lead the Nation in Fighting Global Warming, May 2007.*

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

(d) Traffic Study Policies and Procedures

The City of Los Angeles Department of Transportation (LADOT) has developed the Traffic Study Policies and Procedures (TSPP) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a traffic impact study. In June of 2013, LADOT provided an update to the TSPP that emphasized the importance of sustainability, smart growth, and reduction of GHG emissions in addition to traditional traffic flow considerations when evaluating and mitigating impacts to the City's transportation system as a result of land use policy decisions. The updated edition of the TSPP prioritizes transportation demand management strategies and multi-modal strategies over automobile-centric solutions when mitigating project-related impacts to the City's transportation system. By acknowledging reduction of VMT as a policy goal, the TSPP stands as an implementing mechanism of the City's strategy to conform to the mandates and requirements of AB 32 and SB 375.

d. Existing Conditions

(1) Existing Statewide Greenhouse Gas Emissions

GHGs are the result of both natural and human-influenced activities. Regarding human-influenced activities, motor vehicle travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfires are the primary sources of GHG emissions. Without human intervention, Earth maintains an approximate balance between the emission of GHGs into the atmosphere and the storage of GHGs in oceans and terrestrial ecosystems. Events and activities, such as the industrial revolution and the increased combustion of fossil fuels (e.g., gasoline, diesel, coal, etc.), have contributed to the rapid increase in atmospheric levels of GHGs over the last 150 years. As reported by the CEC, California contributes 1.4 percent of global and

6.2 percent of national GHG emissions.⁶⁰ California represents approximately 12 percent of the national population. Approximately 80 percent of GHGs in California are CO₂ produced from fossil fuel combustion. The current California GHG inventory compiles statewide anthropogenic GHG emissions and carbon sinks/storage from years 2000 to 2012.⁶¹ It includes estimates for CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆. The GHG inventory for California for years 2006 through 2012 is presented in Table IV.C-3 on page IV.C-32. As shown in Table IV.C-3, the GHG inventory for California in 2012 was 458.7 million MTCO₂e. For comparison purposes, CARB estimates that the natural gas leak at Aliso Canyon released approximately 2.4 million MTCO₂e from November 7, 2015, to February 13, 2016.⁶²

(2) Existing Project Site Emissions

The Project Site is currently developed with various uses, including low-density commercial/retail and office uses in the historic Crossroads of the World property; two residential duplexes totaling four dwelling units; three two-story, multi-family apartment buildings, housing a total of 80 dwelling units; one- and two-story structures used for commercial/retail and office uses; and surface parking lots. As discussed in detail in Section II, Project Description, of this Draft EIR, existing development on Development Parcel A of the Project Site includes one- and two-story commercial/retail uses, including a small acting school and music rehearsal store, and surface parking lots. Development Parcel B includes a single-story commercial use fronting McCadden Place; two residential duplexes on the south side of Selma Avenue; three two-story multi-family residential buildings along Selma Avenue and Las Palmas Avenue; a small single-story chiropractic office along Las Palmas Avenue; a one- to two-story building; consisting of community-serving small retail shops along Sunset Boulevard; and a one- to three-story office building also along Sunset Boulevard. Development Parcel C of the Project Site includes Crossroads of the World, which is a designated City Cultural-Historic Monument (Monument #134) and is also listed on the National Register of Historic Places and the California Register of Historical Resources. Development Parcel C of the Project Site also includes a two-story office/retail building west of Crossroads of the World and along Sunset Boulevard, one- and two-story office buildings along Las Palmas Avenue, and a surface

⁶⁰ California Energy Commission, *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004*, CEC-600-2006-013, October 2006.

⁶¹ A carbon inventory identifies and quantifies sources and sinks of greenhouse gases. Sinks are defined as a natural or artificial reservoir that accumulates and stores some carbon-containing chemical compound for an indefinite period.

⁶² California Air Resources Board, *Aliso Canyon Natural Gas Leak—Preliminary Estimate of Greenhouse Gas Emissions*, February 13, 2016.

**Table IV.C-3
California GHG Inventory
(million MTCO₂e)**

	2006	2007	2008	2009	2010	2011	2012
Transportation	189.18	189.27	178.02	171.47	170.46	168.13	167.38
<i>On Road</i>	172.37	172.41	163.00	158.46	157.38	154.91	154.06
Passenger Vehicles	131.79	130.80	124.27	122.41	121.39	118.85	118.28
Heavy Duty Trucks	40.58	41.61	38.73	36.04	36.00	36.06	35.78
<i>Ships & Commercial Boats</i>	4.20	4.31	4.04	3.68	3.71	3.72	3.83
<i>Aviation (Intrastate)</i>	4.57	4.98	4.51	4.04	3.85	3.75	3.72
<i>Rail</i>	3.53	3.17	2.38	1.94	2.33	2.49	2.48
<i>Off Road</i>	3.32	3.18	2.82	2.25	2.03	2.13	2.23
<i>Unspecified</i>	1.20	1.22	1.27	1.10	1.16	1.14	1.06
<i>Percent of Total Emissions</i>	39%	39%	37%	37%	38%	37%	36%
Electric Power	104.54	113.94	120.15	101.32	90.30	88.04	95.09
<i>In-State Generation</i>	49.86	54.13	54.32	53.28	46.71	41.18	51.02
Natural Gas	43.07	47.12	48.02	46.08	40.59	35.92	45.77
Other Fuels	5.64	5.86	5.16	5.85	5.02	4.01	4.44
Fugitive and Process Emissions	1.15	1.16	1.14	1.34	1.10	1.25	0.82
<i>Imported Electricity</i>	54.68	59.81	65.82	48.04	43.59	46.86	44.07
<i>Unspecified Imports</i>	27.95	32.73	37.92	14.99	13.45	15.52	17.48
<i>Specified Imports</i>	26.73	27.08	27.90	33.05	30.14	31.34	26.59
<i>Percent of Total Emissions</i>	22%	23%	25%	22%	20%	20%	21%
Commercial and Residential	41.89	42.11	42.44	42.65	43.82	44.32	42.28
<i>Residential Fuel Use</i>	28.58	28.73	29.07	28.69	29.42	29.89	28.09
Natural Gas	26.60	26.73	26.67	26.31	27.04	27.51	25.76
Other Fuels	1.98	2.01	2.40	2.38	2.39	2.38	2.33
<i>Commercial Fuel Use</i>	12.89	12.88	13.00	13.04	13.48	13.65	13.44
Natural Gas	11.62	11.49	11.16	11.02	11.19	11.33	11.24
Other Fuels	1.27	1.40	1.83	2.02	2.29	2.32	2.19
<i>Commercial Cogeneration Heat Output</i>	0.42	0.49	0.37	0.92	0.92	0.78	0.76
<i>Percent of Total Emissions</i>	9%	9%	9%	9%	10%	10%	9%
Industrial	90.28	87.10	87.54	84.95	88.51	88.34	89.16
<i>Refineries</i>	29.65	29.21	28.42	28.34	30.39	30.12	29.88
<i>General Fuel Use</i>	15.96	14.77	16.00	15.56	17.98	19.14	18.87
Natural Gas	12.38	11.56	12.37	11.46	13.46	14.48	14.30
Other Fuels	3.58	3.20	3.63	4.10	4.52	4.66	4.56

Table IV.C-3 (Continued)
California GHG Inventory
(million MTCO₂e)

	2006	2007	2008	2009	2010	2011	2012
<i>Oil & Gas Extraction^a</i>	16.94	17.00	18.22	17.12	16.18	16.22	16.86
Fuel Use	15.75	15.78	17.03	15.92	15.01	14.91	15.50
Fugitive Emissions	1.19	1.21	1.20	1.20	1.17	1.31	1.36
<i>Cement Plants</i>	9.74	9.14	8.63	5.72	5.56	6.14	6.92
Clinker Production	5.80	5.55	5.28	3.60	3.46	4.08	4.65
Fuel Use	3.95	3.59	3.34	2.12	2.10	2.06	2.26
<i>Cogeneration Heat Output</i>	12.17	11.16	10.40	12.55	12.60	11.14	10.82
<i>Other Process Emissions</i>	5.83	5.83	5.87	5.65	5.80	5.59	5.82
<i>Percent of Total Emissions</i>	19%	18%	18%	19%	20%	20%	19%
Recycling and Waste	7.80	7.93	8.09	8.23	8.34	8.42	8.49
<i>Landfills^b</i>	7.42	7.53	7.66	7.78	7.86	7.92	7.97
<i>Percent of Total Emissions</i>	2%	2%	2%	2%	2%	2%	2%
High Global Warming Potential^d	11.08	11.78	12.87	13.99	15.89	17.35	18.41
<i>Ozone Depleting Substance Substitutes</i>	10.41	11.16	12.24	13.49	15.36	16.58	17.73
<i>Electricity Grid SF6 Losses^c</i>	0.28	0.26	0.27	0.26	0.24	0.24	0.23
<i>Semiconductor Manufacturing^b</i>	0.39	0.36	0.36	0.23	0.29	0.53	0.45
<i>Percent of Total Emissions</i>	2%	2%	3%	3%	4%	4%	4%
Agriculture^e	37.75	37.03	37.99	35.84	35.73	36.34	37.86
<i>Livestock</i>	22.22	23.73	24.09	23.88	23.35	23.38	23.92
Enteric Fermentation (Digestive Process)	11.24	11.93	11.89	11.71	11.51	11.49	11.78
Manure Management	10.98	11.80	12.20	12.17	11.84	11.89	12.14
<i>Crop Growing & Harvesting</i>	10.20	9.50	9.98	9.31	9.57	9.30	10.22
Fertilizers	8.01	7.49	8.04	7.32	7.58	7.25	8.16
Soil Preparation and Disturbances	2.12	1.94	1.87	1.92	1.91	1.98	1.98
Crop Residue Burning	0.07	0.07	0.07	0.07	0.08	0.08	0.08
<i>General Fuel Use</i>	5.33	3.80	3.92	2.65	2.81	3.66	3.72
Diesel	3.87	2.68	3.00	1.79	1.99	2.37	2.47
Natural Gas	0.88	0.79	0.75	0.69	0.65	0.66	0.70
Gasoline	0.57	0.32	0.17	0.17	0.17	0.63	0.55
Other Fuels	0.01	0.00	0.00	0.00	0.00	0.00	0.00
<i>Percent of Total Emissions</i>	8%	8%	8%	8%	8%	8%	8%
Total Net Emissions	482.52	489.16	487.10	458.44	453.06	450.94	458.68
<p>^a Reflects emissions from combustion of fuels plus fugitive emissions.</p> <p>^b These categories are listed in the Industrial sector of ARB's GHG Emission Inventory sectors.</p>							

**Table IV.C-3 (Continued)
California GHG Inventory
(million MTCO₂e)**

	2006	2007	2008	2009	2010	2011	2012
^c This category is listed in the Electric Power sector of ARB's GHG Emission Inventory sectors. ^d High global warming potential is defined as greenhouse gases with much longer atmospheric lifetimes and much stronger radiative forcing properties than CO ₂ . ^e Reflects use of updated USEPA models for determining emissions from livestock and fertilizers. Source: California GHG Inventory for 2000–2012—by Category as Defined in the Climate Change Scoping Plan million tonnes of CO ₂ e—(based upon IPCC Second Assessment Report's Global Warming Potentials).							

parking lot. Existing development on Development Parcel D of the Project Site includes a two-story commercial/retail building and a surface parking lot.

Mobile source emissions from existing uses are generated by motor vehicle trips to and from the Project Site. Area source emissions are generated by maintenance equipment, landscape equipment, and use of products that contain solvents. In addition, energy source emissions are associated with building natural gas usage at the Project Site. Table IV.C-4 below presents the GHG emissions associated with the existing land uses as modeled by the California Emissions Estimator Model (CalEEMod).

**Table IV.C-4
Existing Project Site Annual GHG Emissions Summary**

Scope	Metric Tons of Carbon Dioxide Equivalent ^a (MTCO ₂ e)
Area	28
Energy	1,160
Mobile	2,295
Solid Waste	33
Water/Wastewater Generation	241
Total Emissions	3,757
^a CO ₂ e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix D of this Draft EIR. Source: Eyestone Environmental, 2016.	

3. Project Impacts

a. Methodology

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities. The General Reporting Protocol is based on the “Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard” developed by the World Business Council for Sustainable Development and the World Resources Institute through “a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions.”⁶³ Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this section is consistent with the General Reporting Protocol’s reporting requirements. A detailed discussion of the GHG methodology is included in Appendix D of this Draft EIR.

The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).⁶⁴

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

⁶³ *California Climate Action Registry, General Reporting Protocol Version 3.1.*

⁶⁴ *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.⁶⁵ For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, OPR has noted that lead agencies “should make a good-faith effort, based on available information, to calculate, model, or estimate... GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.”⁶⁶ Therefore, direct and indirect emissions have been calculated for the Project.

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

CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.⁶⁷

⁶⁵ CARB, *Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007.*

⁶⁶ OPR *Technical Advisory, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review, June 2008, p. 5.*

⁶⁷ California Air Pollution Control Officers Association, *California Emissions Estimator Model, CalEEMod™, www.caleemod.com, accessed May 25, 2016.*

(1) Construction

The Project's construction emissions were calculated using CalEEMod Version 2013.2.2. Details of the modeling assumptions and emission factors are provided in Appendix D of this Draft EIR. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and applying the mobile-source and fugitive dust emissions factors derived from the SCAQMD recommended California Emissions Estimator Model (CalEEMod). The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove existing pavement, grade and excavate the Project Site, construct the proposed building and related improvements, and plant new landscaping within the Project Site.

In accordance with the SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the lifetime of the Project. The SCAQMD defines the lifetime of a project as 30 years.⁶⁸ Therefore, total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions.

(2) Operation

Similar to construction, the SCAQMD-recommended CalEEMod is also used to calculate potential GHG emissions generated by new land uses on the Project Site, including mobile sources, electricity, natural gas, water usage/wastewater generation, solid waste generation and disposal, and stationary sources (i.e., emergency generators).

Mobile source emission calculations are based on projection of annual VMT, which is derived from the Transportation Study prepared for the Project.⁶⁹ These values account for the daily and seasonal variations in trip frequency and length associated with new residential, employee, and visitor trips to and from the Project Site and other activities that generate a vehicle trip. CalEEMod calculates GHG emissions from all other sources based on the increase in square footage of the Project.

⁶⁸ SCAQMD, *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*, 2008.

⁶⁹ Gibson Transportation Consulting, Inc., *Traffic Study for the Crossroads Hollywood Mixed-Use Development*, June 2016.

(3) No Implementation of Emission Reduction Measures (NIERM) Comparison Analysis

As noted above, the emissions reduction measures discussed within CARB's *Climate Change Scoping Plan*, AB 900, SCAG's 2016–2040 RTP/SCS, and the City of Los Angeles Green LA: An Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan) are all applicable to the Project. These plans and policies are intended to reduce GHG emissions in order to meet the targets of AB 32. In order to demonstrate the efficacy of these measures required under these applicable GHG reduction plans and policies, and thereby demonstrating consistency with AB 32, this analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG emission reduction measures (the no implementation of emission reduction measures or "NIERM" scenario). This approach mirrors the concepts used in CARB's *Climate Change Scoping Plan* for the implementation of AB 32. This methodology is used to analyze consistency with the applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

Evaluating the reduction in GHG emissions from the NIERM scenario requires providing a quantitative estimate of GHG emissions based on the specific circumstances of the project in the context of relevant state activities and mandates. This requires the following three GHG emissions inventories:

- Baseline, existing environmental setting, GHG emissions;
- NIERM scenario GHG emissions; and
- "As proposed" Project GHG emissions with Project Design Features.

The analysis in this section includes potential emissions under the NIERM scenario and from the Project at buildout based on actions and mandates expected to be in force in 2020 (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California LCFS). Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis (e.g., Pavley II). Similarly, emissions reductions regarding cap-and-trade were not included in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout.

The NIERM scenario is used to establish a comparison with Project-generated GHG emissions under the "as proposed" scenario. The NIERM scenario does not consider site-specific conditions or Project Design Features. Specific NIERM scenario assumptions

for each source category are discussed below in Subsection IV.C.3.d., Analysis of Project Impacts. As an example, area source emissions from fireplaces under the NIERM scenario do not account for Project Design Feature C-2, which would prohibit the use of fireplaces in the proposed residential units. Instead, the NIERM scenario considers default CalEEMod factors provided by SCAQMD for usage of fireplaces in residential units within the region. Mobile source emissions under the NIERM scenario were calculated using the ITE trip-generation rate for each proposed land use and did not consider site-specific benefits resulting from the proposed mix of uses or proximity to public transportation. GHG emissions related to energy use under the NIERM scenario were calculated based on complying with the minimum performance level required under Title 24.

The “as proposed” scenario’s emissions calculations for the Project include credits or reductions for the regulatory requirements and Project Design Features set forth in this Draft EIR, such as reductions in energy, solid waste generation, and water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project-generated trips as a result of Project Design Features would provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2020 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent).

b. Thresholds of Significance

Until the passage of AB 32, CEQA documents generally did not evaluate GHG emissions or impacts on global climate change. Rather, the primary focus of air pollutant analysis in CEQA documents was the emission of criteria pollutants, or those identified in the California and federal CAAs as being of most concern to the public and government agencies (e.g., toxic air contaminants). With the passage of AB 32 and SB 97, CEQA documents now contain a more detailed analysis of GHG emissions.

OPR’s recommended amendments to the CEQA Guidelines for GHGs were adopted by the California Natural Resources Agency on December 30, 2009. Analysis of GHG emissions in a CEQA document presents unique challenges to lead agencies. However, such analysis must be consistent with existing CEQA principles, and, therefore, the amendments comprise relatively modest changes to various portions of the existing CEQA Guidelines. The amendments add no additional substantive requirements; rather, the CEQA Guidelines merely assist lead agencies in complying with CEQA’s existing requirements. Modifications address those issues where analysis of GHG emissions may differ in some respects from more traditional CEQA analysis. Other modifications clarify existing law that may apply both to an analysis of GHG emissions, as well as more traditional CEQA analyses.

The following two questions relating to the effects of GHGs were added to the CEQA Guidelines, Appendix G (Environmental Checklist):

- Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice, this section urges lead agencies to quantify GHG emissions of projects, where possible, and includes language necessary to avoid an implication that a “life-cycle” analysis is required. In addition to quantification, Section 15064.4 recommends consideration of several other qualitative factors that may be used in the determination of significance (i.e., extent to which a project may increase or reduce GHG emissions, whether a project exceeds an applicable significance threshold, and the extent to which a project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs).

Section 15064.4 does not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA’s requirements for cumulative impact analysis (see CEQA Guidelines Section 15130(f)).⁷⁰

Although GHG emissions can be quantified, CARB, SCAQMD, and the City of Los Angeles have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.⁷¹

Per CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply

⁷⁰ See generally, Section 15130(f); see also Letter from Cynthia Bryant, Director of the Governor’s Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.

⁷¹ The South Coast Air Quality Management District has formed a GHG Significance Threshold Working Group.

with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.⁷² To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.⁷³ Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions.”⁷⁴ Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with the a program and/or other regulatory schemes to reduce GHG emissions.⁷⁵

In the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions, including the emissions reduction measures discussed within CARB’s *Climate Change Scoping Plan*, AB 900, SCAG’s 2016–2040 RTP/SCS, and the City of Los Angeles LA Green Plan.

c. Project Design Features

The following Project Design Features are proposed with regard to GHG emissions:

⁷² 14 Cal. Code Regs. Section 15064(h)(3).

⁷³ 14 Cal. Code Regs. Section 15064(h)(3).

⁷⁴ 14 Cal. Code Regs. Section 15064(h)(3).

⁷⁵ See, for example, *San Joaquin Valley Air Pollution Control District (SJVAPCD), CEQA Determinations of Significance for Projects Subject to ARB’s GHG Cap-and-Trade Regulation, APR-2025 (June 25, 2014)*, in which the SJVAPCD “determined that GHG emissions increases that are covered under ARB’s Cap-and-Trade regulation cannot constitute significant increases under CEQA...” Furthermore, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO₂e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, *Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project*, SCH No. 2012041014 (October 2014); SCAQMD, *Final Negative Declaration for Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project*, SCH No. 2013091029 (December 2014); SCAQMD, *Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA*, SCH No. 2014101040 (December 2014); and SCAQMD, *Final Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project*, SCH No. 2014121014 (August 2015).

Project Design Feature C-1: The design of the new buildings will incorporate features to be capable of achieving at least Silver certification under the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED)-CS[®] or LEED-NC[®] Rating System as of January 1, 2011. Specific sustainability features that are integrated into the Project design to enable the Project to achieve LEED[®] Silver certification will include the following:

- a. Exceeding Title 24, Part 6, California Energy Code baseline standard requirements by 15 percent for energy efficiency, based on the 2016 Building Energy Efficiency Standards requirements.
- b. Use of Energy Star-labeled products and appliances.
- c. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- d. Reduce indoor water use by a minimum of 35 percent from the calculated baseline, as required for LEED[®] Silver certification, by installing water fixtures that exceed applicable standards.
- e. See Project Design Feature M.1-2 in Section IV.M.1-1, Utilities and Services Systems—Water Supply and Infrastructure, regarding outdoor water usage.

Project Design Feature C-2: The residential units within the Project will not include the use of fireplaces.

Project Design Feature C-3: The Project will provide a minimum of 135 kilowatts of photovoltaic panels on the Project Site, unless additional kilowatts of photovoltaic panels become feasible due to additional area being added to the Project Site.

Project Design Feature C-4: At least twenty (20) percent of the total code-required parking spaces provided for all types of parking facilities will be capable of supporting future electric vehicle supply equipment (EVSE). Plans will indicate the proposed type and location(s) of EVSE and also include raceway method(s), wiring schematics and electrical calculations to verify that the electrical system has sufficient capacity to simultaneously charge all electric vehicles at all designated EV charging locations at their full rated amperage. Plan design will be based upon Level 2 or greater EVSE at its maximum operating capacity. Only raceways and related components are required to be installed at the time of construction. When the application of the 20 percent results in a fractional space, round up to the next whole number. A label stating "EV CAPABLE" will be posted in a conspicuous place at the service panel or subpanel and next to the raceway termination point. In addition, at least 5 percent

of the total code-required parking spaces shall be equipped with EV charging stations. Plans shall indicate the proposed type and location(s) of charging stations. Plan design shall be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5-percent requirement results in a fractional space, round up to the next whole number.

The Project Applicant agreed to meet the requirement set forth in California Public Resources Code Section 21183, subdivision (c) to demonstrate that the Project would result in no net additional GHG emissions through the purchase of voluntary carbon credits sufficient to offset all projected additional GHG emissions (374,209 MT CO₂e). The SCAQMD recommends that offsets should have a 30-year project life, should be real, quantifiable, verifiable, and surplus and will be considered in the following prioritized manner: (1) project design feature/on-site reduction measures; (2) off-site within neighborhood; (3) off-site within district; (4) off-site within state; and (5) off-site out-of-state. Notably, the commitments to enter into contracts to offset net additional GHG emissions provided in the Application for CEQA Streamlining and included as Appendix D are incorporated as follows:

Project Design Feature C-5: No later than six (6) months after the issuance of a Temporary Certificate of Occupancy for the Project, the Project Applicant will provide to the lead agency, the City of Los Angeles, a calculation of the net additional emissions resulting from the construction of the Project (the “Construction Emissions”), to be calculated in accordance with the methodology agreed upon by the California Air Resources Board (CARB) in connection with the AB 900 certification of the Project (the “Agreed Methodology”). The Project Applicant will provide courtesy copies of the calculations to the CARB and the Governor’s Office promptly following transmittal of the calculations to the City of Los Angeles. The Project Applicant will enter into one or more contracts to purchase voluntary carbon credits from a qualified GHG emissions broker in an amount sufficient to offset the Construction Emissions. The Project Applicant will provide courtesy copies of any such contracts to the CARB and the Governor’s Office promptly following the execution of such contracts.

Project Design Feature C-6: Prior to issuance of any Certificate of Occupancy for any building in the Project, the Project Applicant or its successor will enter into one or more contracts to purchase carbon credits from a qualified GHG emissions broker (to be selected from an accredited registry), which contract, together with any previous contracts for the purchase of carbon credits, will evidence the purchase of carbon credits in an amount sufficient to offset the Operational Emissions attributable to such building in the Project, as well as all previously

constructed buildings in the Project and will be calculated on a net present value basis for a 30-year useful life.

Project Design Feature C-7: Prior to execution of the contract(s), the Project Applicant and its consultant will calculate the Operational Emissions, in accordance with the methodology described in the Project Applicant's "Application for Environmental Leadership Development Project," specifically the "Greenhouse Gas Emissions Methodology and Documentation" prepared by Eyestone Environmental.

Project Design Feature C-8: Once the City has had an opportunity to review and approve the methodology and associated calculations, the Project Applicant will provide copies of the calculation methodology to the California Air Resources Board (CARB) and Governor's Office of Planning and Research (OPR), which is then subject to a determination signed by the Executive Officer of CARB pursuant to the procedures set forth in Section 6 of OPR's Guidelines. The City will issue a Certificate of Occupancy upon receipt of the following: (1) a fully executed copy of the carbon offset purchase agreement(s); (2) a final CARB Determination that the Project will not result in any net additional GHG emissions; and (3) a copy of OPR's Certification Letter for the Project.

d. Analysis of Project Impacts

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

- Construction: emissions associated with demolition of the existing parking lot, buildings to be removed, and buildings to be renovated, site preparation, excavation, grading, building renovations and building construction, and construction-related equipment and vehicular activity;
- Area source: emissions associated with landscape equipment;
- Building operations: emissions associated with space heating and cooling, water heating, energy consumption, and lighting;
- Solid waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon;
- Water: emissions associated with energy used to pump, convey, deliver, and treat water; and
- Stationary source: emissions associated with emergency generators.

The Project would generate an incremental contribution to and cumulative increase in sources of GHGs. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

(1) Construction

Project construction would commence with demolition of the existing buildings and surface parking lots, followed by excavation and grading for the subterranean parking garages. Building foundations would then be placed, followed by building renovations of the historic Crossroads of the World complex and building construction, paving/concrete installation, and landscape installation. Project construction is anticipated to occur over approximately 48 months and be completed before 2022. It is estimated that approximately 647,753 cubic yards (cy) of soil would be hauled from the Project Site during the grading and excavation phase. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips) and CalEEMod modeling output files are provided in Appendix D of this Draft EIR. The emissions of GHGs associated with construction of the Project were calculated for each year of construction activity. A summary of GHG emissions for each year of construction is presented in Table IV.C-5 on page IV.C-46.

As presented in Table IV.C-5, construction of the Project is estimated to generate a total of 9,439 MTCO_{2e}. As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.⁷⁶ A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix D of this Draft EIR.

(2) Operation

(a) Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes hearths and landscape maintenance equipment. CalEEMod default values for types of sources and emission factors were used for the NIERM scenario in this analysis. As an example, the number and types of hearths and natural gas burned per year was based on data supplied by SCAQMD. Project Design Feature C-2 would prohibit the use of fireplaces within the proposed residential units. The reduction in GHG emissions

⁷⁶ SCAQMD, *Governing Board Agenda Item 31, December 5, 2008*.

**Table IV.C-5
Combined Construction-Related Emissions
(MTCO₂e)**

NIERM and Project Scenarios	MTCO₂e^a
2018	3,314
2019	2,229
2020	2,180
2021	1,716
Total	9,439
Amortized Over 30 Years, per year	315
<p>^a CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Construction CalEEMod output file within Appendix D of this Draft EIR. Source: Eyestone Environmental, 2016.</p>	

from Project Design Feature C-2 were calculated and are shown in Table IV.C-6 on page IV.C-47. As shown in Table IV.C-6, the Project is expected to result in a total of 62 MTCO₂e per year from area sources, which would be a reduction of approximately 81 percent in comparison to the NIERM scenario.

(b) Electricity and Natural Gas Emissions

GHGs are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO₂ and other GHGs directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for LADWP were selected in CalEEMod. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

**Table IV.C-6
Area Source Emissions^a**

Source	Total MTCO ₂ e ^b (per year)
No Project	28
NIERM Project	320
Project	62
<p>^a Area source emissions are from landscape equipment and fireplaces.</p> <p>^b CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix D of this Draft EIR.</p> <p>^c Project scenario reflects a reduction in GHG emissions due to a commitment to prohibit the use of fireplaces within the proposed residential units.</p> <p>Source: Eyestone Environmental, 2016.</p>	

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and California Residential Appliance Saturation Survey (RASS) studies.⁷⁷ The data are specific for climate zones, and, therefore, Zone 11 was selected for the Project Site based on the zip code tool. Since these studies are based on older buildings, adjustments have been made to account for changes to Title 24 building codes but do not reflect 2013 Title 24 standards. For the Project scenario, an adjustment was made to account for the 2013 Title 24 standards. New building construction subject to 2013 Title 24 standards are anticipated to be 25 percent more efficient than residential construction built to the 2008 Title 24 standards and 30 percent more efficient for non-residential construction.⁷⁸ Furthermore, an adjustment was made to account for the 2016 Title 24 standards. As discussed above, the 2016 Title 24 standards would be applicable to the Project as the Project would be built after January 1, 2017, when the 2016 Title 24 standards come into effect. New building construction subject to 2016 Title 24 standards are anticipated to be 28 percent more efficient (for electricity) than residential construction built to the 2013 Title 24 standards and 5 percent more efficient (for electricity) for non-residential construction.⁷⁹ With incorporation of Project Design Feature C-1, electricity usage associated with lighting would also be reduced by approximately 25 percent. Since the NIERM scenario reflects the standards that were in effect under the *Climate Change Scoping Plan* prepared in 2006

⁷⁷ CEC, *Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.*

⁷⁸ CEC, *Energy Commission Approves More Efficient Buildings for California's Future, News Release, May 31, 2012.*

⁷⁹ CEC, *Adoption Hearing, 2016 Building Energy Efficiency Standards.*

(Title 24, 2005 Building Energy Efficiency Standards), CalEEMod also provides the ability to select electricity and usage rates that would reflect previous versions of Title 24.

As shown in Table IV.C-7 on page IV.C-49, Project GHG emissions from electricity consumption would result in 3,825 MTCO₂e per year as compared to 4,617 MTCO₂e per year under the NIERM scenario. This would represent a reduction of approximately 17 percent in comparison to the NIERM scenario. This reduction from NIERM is attributable to consistency with specific mandatory requirements of the Los Angeles Green Building Code, Project Design Feature C-1 (specific requirements of achieving LEED Silver), and Project Design Feature C-3 (installation of photovoltaic panels).

As shown in Table IV.C-8 on page IV.C-50, Project GHG emissions from natural gas consumption would result in 1,671 MTCO₂e per year as compared to 2,073 MTCO₂e per year under the NIERM scenario. This would represent a reduction of approximately 19 percent in comparison to the NIERM scenario. This reduction from NIERM is attributable to consistency with compliance with specific mandatory requirements of the CALGreen Code, Los Angeles Green Building Code, and Project Design Feature C-1 (specific requirements of achieving LEED Silver Rating).

(c) Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source emissions from Project operation were calculated based on the Project trip-generation estimates provided by Gibson Transportation Consulting, Inc.⁸⁰ As discussed in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, to calculate daily trips, the number of residential units and amount of building area for the commercial and retail uses were multiplied by the applicable trip-generation rates based on the Institute of Transportation Engineers (ITE)'s *Trip Generation, 9th Edition*. The Project trip-generation accounts for transit credit, internal capture, and incorporation of Mitigation Measure L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR,, which requires the Project to implement a TDM Program.

⁸⁰ Gibson Transportation Consulting, Inc., *Traffic Study for the Crossroads Hollywood Mixed-Use Development*, June 2016.

**Table IV.C-7
Electricity Emissions^a**

Scenario	Electricity Usage (MWh/year)	MTCO ₂ e (per year)
No Project ^b	2,079	1,034
NIERM Project ^c	17,038	4,617
Project ^d	14,131	3,825

MWh = megawatts

^a Energy calculation worksheets are provided in Appendix R. CO₂e was calculated using CalEEMod, and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix D of this Draft EIR.

^b The No Project scenario conservatively assumed that electricity demand for the older buildings on the Project site, most of which were constructed in the early 20th Century, would meet the 2005 Title 24 Building Standards Code.

^c The NIERM scenario assumed consistency with the 2008 Scoping Plan in which electricity demand would comply with the 2005 Title 24 Building Standards Code.

^d The Project scenario assumed that electricity demand would comply with the 2016 Title 24 Building Standards Code. CalEEMod default values only account for compliance with 2008 Title 24. Therefore, electricity usage was reduced as follows: 2013 Standards reduce Title 24 energy requirements by 25 percent for residential and 30 percent for non-residential (CEC, Energy Commission Approves More Efficient Buildings for California’s Future, News Release, May 31, 2012) and 2016 Standards reduce Title 24 electricity requirements by 28 percent for residential and 5 percent for non-residential (CEC, Adoption Hearing, 2016 Building Energy Efficiency Standards). The CalEEMod output for the unmitigated condition reflects consistency with 2016 Title 24 Standards. The mitigated condition reflects the reduction in electricity usage from LEED Silver (i.e., 15 percent below 2016 title 24, use of energy efficient lighting, and Energy Star–labeled products and Appliances) and on-site photovoltaic solar panels.

Source: Eyestone Environmental, 2016.

The Project represents an infill development within an existing urbanized area that would concentrate new residential and neighborhood serving commercial uses within a HQTAs, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.H, Land Use, of this EIR for further details).⁸¹ As discussed in Section IV.L, Traffic, Access, and

⁸¹ The Project Site is also located in Transit Priority Area as defined by Public Resources Code Section 21099. Public Resources Code Section 21099 defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section (Footnote continued on next page)

**Table IV.C-8
Natural Gas Emissions**

Scenario	Natural Gas Usage (MMBTU/year)	CO ₂ e (mtons/year)
No Project	2,341	126
NIERM Project	38,608	2,073
Project	31,125	1,671

MMBTU = million metric tons British thermal unit
mtons = metric tons

^a Energy calculation worksheets are provided in Appendix R. CO₂e was calculated using CalEEMod, and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix D of this Draft EIR.

^b The No Project scenario conservatively assumed that natural gas usage for the older buildings on the Project site, most of which were constructed in the early 20th Century, would meet the 2005 Title 24 Building Standards Code.

^c The NIERM scenario assumed consistency with the 2008 Scoping Plan in which natural gas usage would comply with the 2005 Title 24 Building Standards Code.

^d The Project scenario assumed that natural gas usage would comply with the 2016 Title 24 Building Standards Code. CalEEMod default values only account for compliance with 2008 Title 24. Therefore, natural gas usage was reduced as follows: 2013 Standards reduce Title 24 energy requirements by 25 percent for residential and 30 percent for non-residential (www.energy.ca.gov/releases/2012_releases/2012-05-31_energy_commission_approves_more_efficient_buildings_nr.html). The CalEEMod output for the unmitigated condition reflects consistency with 2016 Title 24 Standards. The mitigated condition reflects the reduction in natural gas usage from LEED Silver (i.e., 15 percent below 2016 title 24 and Energy Star-labeled products and Appliances).

Source: Eyestone Environmental, 2016.

Parking, of this Draft EIR, the Project Site is located approximately 0.13 mile from the Metro Red Line Hollywood/Highland Station. In addition, approximately 22 Metro and Dash bus lines serve the Project Site area, including 18 Metro bus lines and four Dash bus lines. The Project would provide bicycle storage areas and 1,279 bicycle parking spaces for Project residents and guests. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. The Project characteristics listed below are consistent with the CAPCOA guidance document,

450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” Public Resources Code Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” Also refer to the City’s ZIMAS System regarding the location of the Project Site within a Transit Priority Area. www.zimas.lacity.org, accessed May 11, 2016.

Quantifying Greenhouse Gas Mitigation Measures,⁸² which provides emission reduction values for recommended mitigation measures, and would reduce VMT and vehicle trips to the Project Site. These characteristics would, therefore, result in a corresponding reduction in VMT and associated GHG emissions. The CAPCOA measures, which exemplify the characteristics of the Project, include the following (a brief description of the Project's relevance to the measure is also provided):

- **Increase Density (LUT-1):** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. The Project would increase the site density from 11 dwelling units per acre and 10 jobs per acre to approximately 119 dwelling units per acre and 208 jobs per acre.
- **Increase Location Efficiency (LUT-2):** Location efficiency describes the location of the Project in relation to the type of urban landscape, such as an urban area, compact infill, or suburban center. In general, compared to the statewide average, a project could realize VMT reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center from land use/location strategies. The Project Site represents an urban/compact infill location within the Hollywood Community Plan Area. The Project Site is served by existing public transportation located within 0.25 mile. The Project Site is also located within the Hollywood Center, which is generally located on both sides of Hollywood and Sunset Boulevards between La Brea Avenue and Gower Street.⁸³ The Community Plan calls for the Hollywood Center to function as: (1) the commercial center for Hollywood and surrounding communities; and (2) an entertainment center for the entire region. The Community Plan further states that development, combining residential and commercial uses, is especially encouraged in the Hollywood Center. The location efficiency of the Project Site would result in benefits that would reduce vehicle trips and VMT compared to the statewide average and would result in corresponding reductions in transportation-related emissions for both the Existing/No Project and Project conditions.
- **Increase Diversity of Urban and Suburban Developments (Mixed-Uses) (LUT-3):** The Project would co-locate complementary commercial and residential land uses in proximity to other existing off-site commercial and residential uses. The Project would also introduce new uses on the Project

⁸² *California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, 2010.*

⁸³ *City of Los Angeles, Hollywood Community Plan, December 13, 1988, p. HO-2.*

Site, including a new hotel and increase in open space. The increases in land use diversity and mix of uses on the Project Site would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation (i.e., walking and biking), which would result in corresponding reductions in transportation-related emissions.

- **Increase Destination Accessibility (LUT-4):** The Project would be located in an area that offers access to multiple other nearby retail and entertainment destinations, including Hollywood & Highland Center located approximately 0.13 mile to the northwest of the Project Site. In addition, the Project Site is located within 5.5 miles of Downtown Los Angeles, a primary job center, also easily accessible by public transportation (including the Metro Red Line, which connects the Hollywood/Highland Station to several stations in Downtown Los Angeles and North Hollywood). The access to multiple destinations in proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions for both the Existing/No Project and Project conditions.
- **Increase Transit Accessibility (LUT-5):** The Project would be located approximately 0.13 mile from the Metro Red Line Hollywood/Highland Station and along several Metro transit and DASH routes. This reduction measure is applicable for both the Existing/No Project and Project conditions. The Project would also provide adequate bicycle parking spaces for residential and commercial uses to encourage the use of alternative modes of transportation.
- **Integrate Affordable and Below Market Rate Housing (LUT-6):** Below market rate housing provides greater opportunity for people to live closer to job centers and to accommodate more people in urban infill areas. The Project would include 84 below market rate (i.e., Very Low Income) dwelling units, which would result in an increase in alternative transit usage and a corresponding reduction in transportation-related emissions.
- **Improve Design of Development (LUT-9):** The project would include improved design elements including ground floor retail, pedestrian paseos, open space and improved streetscape amenities which would enhance walkability in the project vicinity. The Project would also locate a development in an area with a high level of street accessibility and connectivity. This reduction measure is applicable for both the Existing/No Project and Project conditions.
- **Provide Pedestrian Network Improvements (SDT-1):** Providing links and minimizing barriers to the Project Site to pedestrian-oriented areas and activities would encourage people to walk instead of drive. The Project would provide an internal pedestrian network (i.e., pedestrian paseo) to retail, residential and open space uses to encourage and increase pedestrian activities in the area, which

would further reduce VMT and associated transportation-related emissions. Furthermore, the Project would result in an improved and aesthetically appealing streetscape that would promote pedestrian activity, particularly between the Metro Red Line Hollywood/Highland Station and the Hollywood & Highland Center and the Project Site, and thereby enhance the surrounding neighborhood.

- **Traffic Calming Measures (SDT-2):** Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. This mode shift results in a decrease in VMT. Streets within a half mile of the Project Site are equipped with sidewalks, and approximately 25 percent of the intersections include marked crosswalks and/or count-down signal timers. In addition, the Project's realignment of Las Palmas Avenue would improve circulation in the Project vicinity.

CalEEMod calculates VMT based on the type of land use, trip purpose, trip type percentages for each land use subtype in the project (primary, diverted, and pass-by). As shown in Table IV.C-9 on page IV.C-54, the Project GHG emissions from mobile sources would result in a total of 11,677 MTCO₂e per year as compared to 21,263 MTCO₂e per year under the NIERM scenario. This would represent a reduction of approximately 45 percent in comparison to the NIERM scenario. This reduction from the NIERM scenario is attributable to project characteristics and vehicular trip reduction measures (i.e., transit credit, internal trip capture, TDM Program measures).

(d) Solid Waste Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table IV.C-10 on page IV.C-55, the Project is expected to result in a total of 345 MTCO₂e per year from solid waste based on a conservative assumption of a minimum diversion rate of approximately 50 percent.

(e) Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water and wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include: (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and released or reused as reclaimed water.

**Table IV.C-9
Mobile Source Emissions**

	Daily Weekday Trips^a	Annual VMT^b	CO₂e (mtons/year)^c
No Project	2,632	4,857,008	2,295
NIERM Scenario	25,482	53,158,256	21,263
Project ^d	11,677	29,191,797	11,677
<hr/> <i>mtons = metric tons</i> ^a Average daily trips are based on the Project's trip-generation estimates in the Traffic Study (see Appendix O of this Draft EIR). Please note that the rate does not include the reduction from pass-by trips included in Traffic Study, provided in Appendix O, of this Draft EIR, since CalEEMod calculates the reduction in those trips internally. ^b VMT was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix D of this Draft EIR. ^c This assessment uses CO ₂ emission factors provided by CARB staff that reflect 2017–2025 vehicle emission standards. ^d The reduction from the NIERM scenario is attributable to vehicular trip reduction measures, including transit credit, internal trip capture, TDM Program measures. Source: Eyestone Environmental, 2016.			

Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor⁸⁴ to determine the embodied energy necessary to supply potable water. GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG intensity factors for LADWP were selected in CalEEMod.

As shown in Table IV.C-11 on page IV.C-56, the Project is expected to result in 449 MTCO₂e as compared to 744 MTCO₂e per year under the NIERM scenario per year from water usage and wastewater generation, which would represent a reduction of approximately 40 percent in comparison to the NIERM scenario. This reduction from the NIERM scenario is attributable to compliance with specific mandatory requirements of the Los Angeles Green Building Code, Project Design Feature C-1 (which includes LEED[®] features that would reduce indoor water use by a minimum of 35 and outdoor water use by a minimum of 50 percent from the calculated baseline at peak watering month by installing efficient irrigation). Please refer to Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, for specific water usage and Section IV.M.2,

⁸⁴ The intensity factor reflects the average pounds of CO₂e per megawatt generated by a utility company.

**Table IV.C-10
Solid Waste Generation Emissions**

	Tons/Year ^a	MTCO ₂ e ^b (per year)
No Project	73	33
NIERM Scenario	759	345
Project—Total Waste to Landfill	759	345
<p>^a The rates were based on statewide averages and the total amount of waste disposed was reduced by the diversion rate of 50 percent, pursuant to the City of Los Angeles Solid Waste Management Policy Plan, which was adopted by the City to comply with Assembly Bill 939.</p> <p>^b CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix D of this Draft EIR.</p> <p>Source: Eyestone Environmental, 2016.</p>		

Utilities and Service Systems—Wastewater, of this Draft EIR, for wastewater generation reduction measures applicable to the Project.

(f) Emergency Generator Emissions

The Project would include eight emergency generators with a combined rating of 6,355 kilowatts or 8,519 horsepower. The equipment would be operated approximately once per month for 30 minutes for routine maintenance and testing purposes. The estimated annual emissions from emergency generators would be approximately 22 MT/CO₂e per year. Detailed emissions calculations are provided in Appendix D of this Draft EIR.

(3) Combined Construction and Operation Emissions

As shown in Table IV.C-12 on page IV.C-57, when taking into consideration implementation of Project Design Features provided throughout this Draft EIR, including

the requirements set forth in the City of Los Angeles Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would equal 315 MTCO₂e per year during construction and 18,051 MTCO₂e per year during operation of the Project for a combined total of 18,365 MTCO₂e per year.⁸⁵

⁸⁵ CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the corresponding CalEEMod output files in Appendix D of this Draft EIR. As a note, the Project's GHG emission would comprise 0.003 percent of California's GHG emissions and 0.00004 percent of global emissions in 2012.

**Table IV.C-11
Water Usage/Wastewater Generation Emissions**

	Indoor^a (million gallons/year)	Outdoor^a (million gallons/year)	CO₂e^b (mtons/year)
No Project	21.7	13.3	241
NIERM Scenario	121.4	54.8	744
Project	78.9	27.4	449

^a *The Project would be designed to incorporate PDFs that would reduce its water usage with the goal of achieving or exceeding the requirements of USGBC LEED Silver rating (i.e., reduce indoor water use by a minimum of 35 percent by installing water fixtures that exceed applicable standards and 50% from the outdoor water calculated baseline at peak watering month by installing efficient irrigation).*

^b *CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix D of this Draft EIR.*

Source: Eyestone Environmental, 2016.

The Project would result in a decrease in GHG emissions that represents an approximate 38-percent reduction from the NIERM scenario. This demonstrates the efficacy of the GHG reduction programs and measures applicable to the Project.

In addition, the Project is designed in accordance with the regulatory requirements and includes Project Design Features that would be consistent with the following City of Los Angeles goals provided in the Air Quality Element of the City of Los Angeles General Plan:

- Improving energy and water efficiency in buildings;
- Installing water-efficient landscaping;
- Reducing per capita water use; and
- Increasing recycling rates.

Specifically, the Project would comply with the 2016 Title 24 standard requirements for energy efficiency, and new buildings and infrastructure would be designed to achieve the standards of the Silver Rating under LEED[®]. In addition, the Project would include specific TDM features, water conservation features, solid waste management and recycling features, as set forth in Section IV.L, Traffic, Access, and Parking, Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure, and Section IV.M.3, Utilities and Service Systems—Solid Waste, respectively.

Table IV.C-12
Net Annual GHG Emissions Summary (Year 2022)^a
(metric tons of carbon dioxide equivalent)

Emission Type	No Project	“NIERM” Scenario^a	Project^b	Project’s Reduction from the “NIERM” Scenario
Area	28	320	62	-81%
Energy	1,160	6,690	5,496	-18%
Mobile	2,295	21,263	11,677	-45%
Solid Waste	33	345	345	0%
Water/Wastewater	241	744	449	-40%
Emergency Generator	0	22	22	0%
Construction	0	315	315	0%
Total Emissions^b	3,757	29,698	18,365	-38%

^a CO₂e was calculated using CalEEMod and the results are provided in Section 2.0 of the Operation CalEEMod output file within Appendix D of this Draft EIR. Total emissions for the “NIERM” Scenario and the Project reflect emission from operation of the proposed buildings less existing uses to be removed.

^b The total break from NIERM percent reduction represents the average reduction applied to the total emissions generated by the Project in comparison to the NIERM scenario.

Source: Eyestone Environmental, 2016.

As described above and provided throughout this Draft EIR, the Project includes Project Design Features and is subject to all applicable regulatory requirement that would reduce the Project’s GHG emissions profile and would represent improvements over the NIERM scenario. These reductions in GHG emissions reflect the measures set forth in the applicable GHG reduction plans and policies and demonstrate the efficacy of these measures.

(4) Consistency with Applicable Plans and Policies

As described above, compliance with a GHG emissions reduction plan renders a less-than-significant impact. The following section describes the extent the Project’s design features comply with or exceed performance-based standards included in the regulations outlined in CARB’s *Climate Change Scoping Plan*, AB 900, SCAG’s 2016–2040 RTP/SCS, and the City of Los Angeles LA Green Plan. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

(a) *Climate Change Scoping Plan*

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a *Climate Change Scoping Plan* as required by AB 32.⁸⁶ The *Climate Change Scoping Plan* has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

As shown in Table IV.C-12 on page IV.C-57, Project operation would result in 18,051 MTCO₂e where less than 1 percent of the emissions are from area sources, 30 percent are from energy consumption, 65 percent are from mobile sources, 2 percent are from solid waste generation, and 2 percent are from water supply, treatment, and distribution.⁸⁷ Provided below is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the Project's design features comply with or exceed the reduction actions/strategies outlined in the *Climate Change Scoping Plan*.

(i) *Energy*

Applicable GHG reduction actions and strategies that would serve to reduce energy-related GHG emissions from the Project are included in Table IV.C-13 on page IV.C-59. As shown in Table IV.C-13, the Project's design features comply with or exceed the reduction actions/strategies included in the *Climate Change Scoping Plan*.

(ii) *Mobile*

Applicable GHG reduction actions and strategies that would serve to reduce mobile source-related GHG emissions from the Project are included in Table IV.C-14 on page IV.C-62. As shown in Table IV.C-14, the Project's design features comply with or exceed the reduction actions/strategies included in the *Climate Change Scoping Plan*.

⁸⁶ CARB, *Climate Change Proposed Scoping Plan: A Framework for Change*, December 2008.

⁸⁷ *An evaluation of stationary sources is not necessary as the stationary sources emissions will be created by emergency generators which would only be used in an emergency.*

**Table IV.C-13
Consistency Analysis—Climate Change Scoping Plan
(Energy Related Sources)**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California’s RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016.</p>	<p>LADWP</p>	<p>Consistent. LADWP’s commitment to achieve 35 percent renewables by 2020 would exceed the requirement under the RPS program of 33 percent renewables by 2020. In 2011, LADWP indicated that 20 percent of its electricity came from renewable resources in Year 2010.^a As LADWP would provide electricity service to the Project Site, the Project would use electricity that is produced consistent with the RPS requirements. Electricity GHG emissions provided in Table IV.C-7 on page IV.C-49 assume that LADWP will receive at least 33 percent of their electricity from renewable sources by the year 2020.</p>
<p>Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.^b</p>	<p>State Energy Resources Conservation and Development Commission and LADWP</p>	<p>Consistent. LADWP would be required to generate electricity that would increase renewable energy resources to 50 percent by 2030. As LADWP would provide electricity service to the Project Site, the Project by 2030 would use electricity consistent with the requirements of SB 350. Project buildout would occur in Year 2022, and, therefore, the estimated GHG emissions from electricity usage provided above conservatively do not include implementation of SB 350 with a compliance date of 2030. Electricity GHG emissions presented in Table IV.C-7 on page IV.C-49 would be further reduced by 17 percent by Year 2030 as the electricity provided to the Project Site would meet the requirements under SB 350.</p> <p>As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR, Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs, such as rebates for high-efficiency appliances, heating ventilation and air-conditioning (HVAC) systems and insulation.</p> <p>The Project would further support this action/strategy because it includes Project Design Feature C-1, which requires the buildings to be designed to achieve the standards of the Silver Rating under the LEED® green building program or equivalent green building standards and comply with specific requirements of the Los Angeles Green Code (consistency with this regulation is discussed below). The Project also includes Project Design Feature C-1, which states that the</p>

Table IV.C-13 (Continued)
Consistency Analysis—Climate Change Scoping Plan
(Energy Related Sources)

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
		Project would be designed to achieve 15 percent efficiency above the applicable Title 24 standards.
<p>Senate Bill 1368 (SB 1368): GHG Emissions Standard for Baseload Generation prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant.</p>	State, CEC, and LADWP	<p>Consistent. LADWP would meet the requirements of SB 1368. As LADWP would provide electricity service to the Project Site, the Project would use electricity that meets the requirements under SB 1368.</p>
<p>California Code of Regulations (CCR), Title 20: The 2014 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.</p>	State and CEC	<p>Consistent. The Appliance Efficiency Regulations apply to new appliances and lighting that are sold or offered for sale in California. The Project would include new appliances and lighting that comply with this energy efficiency standard. In addition, the Energy section of the Draft EIR demonstrates that the Project efficiently uses energy and does not result in wasteful energy use.</p>
<p>CCR, Title 24, Building Standards Code: The 2013 Building Energy Efficiency Standards, contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.</p> <p>The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.</p>	State and CEC	<p>Consistent. Consistent with regulatory requirements, the Project shall comply with applicable provisions of the 2013 Los Angeles Green Code that, in turn, requires compliance with mandatory standards included in the California Green Building Standards. The 2013 Title 24 standards are 25 percent more efficient than the 2008 Title 24 standards for residential construction and 30 percent better for non-residential construction.^c The 2013 Title 24 standards are approximately 40 to 45 percent more efficient than the 2020 Projected Emissions under Business-as-Usual in the <i>Climate Action Scoping Plan</i>. The standards offer builders better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Furthermore, the Project would comply with the updated 2016 Title 24 standards since those standards would be applicable to the Project as the Project would be built after January 1, 2017, when the standards come into effect. Thus, the Project has incorporated energy efficiency standards that are more effective than the measures identified in the <i>Climate Action Scoping Plan</i> to reduce GHG emissions.</p>
<p>Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the U.S.</p>	Federal/Manufacturers	<p>Consistent. EISA would serve to reduce the use of incandescent light bulbs for the Project and, thus, reduce energy usage associated with lighting.</p>

Table IV.C-13 (Continued)
Consistency Analysis—Climate Change Scoping Plan
(Energy Related Sources)

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
to phase out incandescent light bulbs between 2012 and 2014 resulting in approximately 25 percent greater efficiency for light bulbs and requires approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.		Electricity GHG emissions provided in Table IV.C-7 on page IV.C-49 conservatively account for a 25-percent reduction in lighting electricity consumption with implementation of this regulation.
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018. ^d	State/ Manufacturers	Consistent. As with the EISA, discussed above, the Project would meet the requirements under AB 1109 because it incorporates energy efficient lighting and electricity consumption that complies with local and state green building programs.
Cap-and-Trade Program: The program establishes an overall limit on GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, and cement production). Facilities subject to the cap are able to trade permits to emit GHGs within the overall limit.		Consistent. As required by AB 32 and the Climate Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. Therefore, GHG emissions associated with the Project's 14,131 megawatts of electricity usage per year presented in Table IV.C-7 on page IV.C-49 would be covered by the Cap-and-Trade Program and would be consistent with AB and the Climate Change Scoping Plan.
<p>^a LADWP Newsroom, "Mayor Villaraigosa Announces Historic Renewable Energy Achievement," January 31, 2011.</p> <p>^b Senate Bill 350 (2015–2016 Reg. Session) Stats 2015, Ch. 547.</p> <p>^c CEC, Energy Commission Approves More Efficient Buildings for California's Future, News Release, May 31, 2012.</p> <p>^d Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534.</p> <p>Source: Eyestone Environmental, 2016.</p>		

**Table IV.C-14
Consistency Analysis—Climate Change Scoping Plan
(Mobile Related Sources)**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Assembly Bill 1493 (AB 1493) “Pavley Standards”: AB 1493 requires the development and adoption of regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. In compliance with AB 1493, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California’s Advanced Clean Cars program (discussed below).</p>	State, CARB	<p>Consistent. The Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and are expected to reduce GHG emissions by about 30 percent in 2016, all while improving fuel efficiency. GHG emissions related to vehicular travel by the Project would benefit from this regulation because vehicle trips associated with the Project would be affected by AB 1493. Mobile source GHG emissions provided in Table IV.C-9 on page IV.C-54 were calculated using CalEEMod which includes implementation of AB 1493 into mobile source emission factors.</p>
<p>Executive Order S-01-07: The Low Carbon Fuel Standard (LCFS) requires a 10-percent or greater reduction by 2020 in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (CARB 2009).^{c,d}</p>	State, CARB	<p>Consistent. GHG emissions related to vehicular travel by the Project would benefit from this regulation because fuel used by Project-related vehicles would be compliant with LCFS. Mobile source GHG emissions provided in Table IV.C-9 on page IV.C-54 were calculated using CalEEMod which includes implementation of the LCFS into mobile source emission factors.</p>
<p>Advanced Clean Cars Program: In 2012, CARB approved the Advanced Clean Cars Program, a new 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.</p>	State, CARB	<p>Not applicable. Although this is not applicable to the Project since it is a statewide program, standards under the Advanced Clean Cars Program will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Project. GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table IV.C-9 on page IV.C-54, above, conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. The Project would further support this regulation since the Project Applicant would provide at least 20 percent of the total code-required parking spaces for the Project to be capable of supporting EVSE, as dictated by Project</p>

**Table IV.C-14 (Continued)
Consistency Analysis—Climate Change Scoping Plan
(Mobile Related Sources)**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.</p>	<p>State, CARB Regional, SCAG</p>	<p>Design Feature C-4.</p> <p>Consistent. SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project is an infill project and is located in an SCS area. Also, as shown below, the Project would be consistent with SCAG’s 2016–2040 RTP/SCS because it is located within a HQTAs. Project-related VMT is reduced by approximately 45 percent (see Table IV.C-9 on page IV.C-54). The RTP/SCS targets a 9-percent reduction in VMT by 2020 and a 16-percent reduction by 2035. Thus, the Project would be consistent with SB 375 and the RTP/SCS.</p>
<p>^a U.S. Environmental Protection Agency, <i>Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule, May 7, 2010.</i></p> <p>^b California Air Resources Board, “<i>Comparison of GHG Reductions for all Fifty United States Under CAFE standards and ARB Regulations Adopted Pursuant to AB 1493,</i>” January 23, 2008.</p> <p>^c California Air Resources Board, <i>Initial Statement of Reason for Proposed Regulation for the Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009.</i></p> <p>^d Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the “lifecycle” of a transportation fuel.</p> <p>Source: Eyestone Environmental, 2016.</p>		

(iii) Solid Waste Diversion

Applicable GHG reduction actions and strategies that would serve to reduce solid waste-related GHG emissions from the Project are included in Table IV.C-15 on page IV.C-64. As shown in Table IV.C-15, the Project’s design features comply with or exceed the reduction actions/strategies included in the *Climate Change Scoping Plan*.

(iv) Water

Applicable GHG reduction actions and strategies that would serve to reduce water-related GHG emissions from the Project are included in Table IV.C-16 on page IV.C-65. As shown in Table IV.C-16, the Project’s design features comply with or exceed the reduction actions/strategies included in the *Climate Change Scoping Plan*.

**Table IV.C-15
Consistency Analysis—Climate Change Scoping Plan
(Waste Related Sources)**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.^a</p> <p>AB 341 (2011) amended the California Integrated Waste Management Act of 1989 to include a provision declaring that it is the policy goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter.^b</p>	<p>State</p>	<p>Consistent. GHG emissions related to solid waste generation from the Project would benefit from this regulation as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would then in return decrease the amount of methane released from the decomposing solid waste. Project-related GHG emissions from solid waste generation, provided in Table IV.C-10 on page IV.C-55 includes a conservative reduction rate of 50 percent, discussed further in Section IV.M.3, Utilities and Service Systems—Solid Waste. Furthermore, the Project would comply with regulatory requirements. In addition, Project Design Feature M.3-1, discussed further in Section IV.M.3, Utilities and Service Systems—Solid Waste, states that the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material.</p>
<p>^a Cal. Pub. Res. Code Section 41780(a). ^b Cal. Pub. Res. Code Section 41780.01(a). Source: Eyestone Environmental, 2016.</p>		

(b) AB 900

As discussed above, AB 900 establishes procedures for applying for streamlined environmental review under CEQA for Projects that meet certain requirements. With respect to GHG emissions, a project must demonstrate that it would not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with Public Resources Code Section 21183(c). The Project Applicant submitted an Application for CEQA Streamlining which is included as Appendix D of this Draft EIR. As determined therein, the Project would not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with PRC Section 21183(c) with the purchase of emission offset credits. Therefore, the Project would meet the GHG emissions requirements for streamlined environmental review under CEQA.

**Table IV.C-16
Consistency Analysis—Climate Change Scoping Plan
(Water-Related Sources)**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.</p>	State	<p>Consistent. The Project shall comply with applicable provisions of the 2013 Los Angeles Green Code, which, in turn, requires compliance with mandatory standards included in the California Green Building Standards (20 percent overall water use reduction). Project-related GHG emissions from water-related sources, provided in Table IV.C-11 on page IV.C-56 incorporates Project Design Feature C-1, which, includes LEED® features that would reduce indoor water use by a minimum of 35 percent, and Project Design Feature M.1-2, which states that the Project would reduce outdoor water use by a minimum of 50 percent. The Project would have an overall water use reduction of 40 percent and would meet the requirements of the California Green Building Standards.</p>
<p>Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This in an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convey, treat, and distribute the water; it also reduces emissions from wastewater treatment.</p>	State	<p>Consistent. As discussed above under Title 24, the Project would meet the goal of reducing per-capita urban water use by 20 percent. In addition, Project Design Feature M.1-1 of the Draft EIR provides a specific list of water conservation measures. Examples include high-efficiency toilets, residential faucets with flow rate of 1.2 gallons per minute, high efficiency clothes washer, leak detection system, drip/sub-surface irrigation, and water fixtures that exceed applicable standards, among others. The Project, thereby, includes measures consistent with the GHG reductions sought by SB X7-7 related to water conservation and related GHG emissions.</p>
<p>Source: <i>Eyestone Environmental, 2016.</i></p>		

(c) 2016–2040 RTP/SCS

As discussed above, the SCAG region was home to about 18.3 million people in 2012 and currently includes approximately 5.9 million homes and 7.4 million jobs. By 2040, the integrated growth forecast projects that these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. The 2016–2040

RTP/SCS is the region's transportation and sustainability investment strategy for protecting and enhancing the region's quality of life and economic prosperity through this period. 2016–2040 RTP/SCS implementation is expected to result in regional benefits to mobility, economy, health and sustainability. The 2016–2040 RTP/SCS is expected to reduce per capita transportation emissions by eight percent by 2020 and 18 percent by 2035. This level of reduction would meet and exceed the region's GHG targets set by CARB of 8 percent per capita by 2020 and 13 percent per capita by 2035.⁸⁸ Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS's GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.⁸⁹ The 2016–2040 RTP/SCS would result in an estimated 21 percent decrease in per capita GHG emissions by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21 percent decrease in per capita GHG emissions by 2040 (an additional 3-percent reduction in the five years between 2035 [18 percent] and 2040 [21 percent]),⁹⁰ the 2016–2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. As shown in Table IV.C-12 on page IV.C-57, the Project results in a VMT reduction of approximately 45 percent in comparison to the NIERM scenario and would, therefore, be consistent with the reduction in transportation emission per capita provided in the 2016–2040 RTP/SCS.

The Project would also be consistent with the following key GHG reduction strategies in SCAG's 2016–2040 RTP/SCS, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- More multi-family housing;
- Jobs and housing closer to transit;
- New housing and job growth focused in HQTAs; and
- Biking and walking infrastructure to improve active transportation options and transit access.

⁸⁸ SCAG, *2016–2040 RTP/SCS, Executive Summary*, p. 8.

⁸⁹ SCAG, *Program Environmental Impact Report for 2016–2040, RTP/SCS, December 2015, Figure 3.8.4-1*.

⁹⁰ *Reductions from years 2035 to 2040 are based on performance measures provided in the 2016–2040 RTP/SCS.*

The Project represents an infill development within an existing urbanized area that would concentrate new residential and neighborhood-serving commercial uses within a HQTAs, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.H, Land Use, of this EIR for further details). The Project Site is located approximately 0.13 mile from the Metro Red Line Hollywood/Highland Station. In addition, in accordance with Mitigation Measure L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, the Project Applicant shall develop and implement a TDM Program that includes strategies to promote non-auto travel (e.g., approximately 22 Metro and Dash bus lines serve the Project Site) and reduce the use of single occupant vehicle (SOV) trips. The Project would also provide bicycle storage and parking areas for Project residents and guests. The Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking, which would facilitate a reduction in VMT and related vehicular GHG emissions, which would be consistent with the goals of SCAG’s 2016–2040 RTP/SCS.

At the regional level, 2016–2040 RTP/SCS is an applicable plan adopted for the purpose of reducing GHGs. In order to assess the Project’s potential to conflict with 2016–2040 RTP/SCS, this section also analyzes the Project’s land use assumptions for consistency with those utilized by SCAG in its SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG’s SCS, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. Table IV.C-17 on page IV.C-68 demonstrates the Project’s consistency with the Actions and Strategies set forth in the 2016–2040 RTP/SCS.

Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2016–2040 RTP/SCS.

(d) LA Green Plan

The Project would be consistent with the LA Green Plan.⁹¹ The LA Green Plan outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. Table IV.C-18 on page IV.C-81, provides a discussion of the Project’s consistency with applicable GHG-reducing actions from the LA Green Plan. As discussed below, the Project is consistent with the applicable goals and actions of the LA Green Plan. To facilitate implementation of the LA Green Plan, the City adopted the Los Angeles Green Code. The 2013 Los Angeles

⁹¹ City of Los Angeles, *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming*, May 2007.

**Table IV.C-17
Consistency Analysis—2016–2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Actions and Strategies		
Coordinate ongoing visioning efforts to build consensus on growth issues among local governments and stakeholders.	SCAG	Not Applicable. The responsible party identified in the 2016–2040 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on regional growth issues.
Provide incentives and technical assistance to local governments to encourage projects and programs that balance the needs of the region.	SCAG	Not Applicable. The responsible party identified in the 2016–2040 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on its advancement of projects and programs that meet regional needs. Furthermore, the Project would support this measure by providing needed housing, employment opportunities, and supportive uses and amenities.
Collaborate with local jurisdictions and agencies to acquire a regional fair share housing allocation that reflects existing and future needs.	SCAG, Local Jurisdictions, HCD	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG, local jurisdiction, and HCD. The Project would not impair SCAG from collaborating with local jurisdictions and agencies to acquire regional fair share housing allocation. While not applicable, the Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area by providing needed housing within an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major employment centers, in furtherance of SB 375 policies.
Expand Compass Blueprint program to support member cities in the development of bicycle, pedestrian, Safe Routes to Schools, Safe Routes to Transit, and ADA Transition plans.	SCAG, State	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair SCAG or the state's expansion of this Compass Blueprint program. Moreover, the network of streets surrounding the Project Site provides sidewalks connected to transit stops to promote alternative transportation and ensure safe routes for bicycles and pedestrians. See Section IV.L, Traffic, Access, and Parking, of this Draft EIR for a list of TDM measures and pedestrian safety enhancements.
Continue to support, through Compass Blueprint, local jurisdictions and sub-regional COGs adopting neighborhood-oriented development, suburban villages, and revitalized main streets as livability strategies in	SCAG, State, Local Jurisdictions, COGs	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG, state, local jurisdictions, and COGs. Nevertheless, the Project area is well-served by high-quality transit and is designated as a HQT. The Project would not impair the City from

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
areas not served by high-quality transit.		adopting neighborhood-oriented development, revitalized main streets as livability strategies in areas not served by high-quality transit.
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions, COGs, SCAG, CTCs	Consistent. While the use of alternative-fueled vehicles by the Project's future residents and occupants is beyond the direct control or influence of the Project Applicant, the Project would not impair the City's or SCAG's ability to encourage the use of alternative-fueled vehicles through various policies and programs. Specifically, the Project, as described under Project Design Feature C-4, would provide EV-ready parking spaces equal to 20 percent of the total Code required parking spaces.
Continue to support, through Compass Blueprint, planning for new mobility modes such as range-limited Neighborhood Electric Vehicles (NEVs) and other alternative fueled vehicles.	SCAG, State	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the state. However, as noted above, the Project would not impair any jurisdiction's ability to encourage the use of alternative-fueled vehicles. Moreover, the Project, as described under Project Design Feature C-4, would provide EV-ready parking spaces equal to 20 percent of the total Code required parking spaces.
Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities.	SCAG, State, Local Jurisdictions	Consistent. The Project would not impair the City's, SCAG's, or the state's ability to collaborate with the region's public health professionals regarding the integration of public health issues in regional planning. Additionally, the Project would encourage healthy lifestyles through the provision of 1,290 bicycle parking spaces on-site. Moreover, the Project would provide various recreational facilities to serve the needs of Project residents and pedestrian walkways throughout the Project Site. The Project would also incorporate measures to reduce air emissions and greenhouse gases, minimize hazards, and ensure water quality (see Section IV.B, Air Quality; Section IV.C, Greenhouse Gas Emissions; and Section IV.G, Hydrology and Water Quality—Water Quality, of this Draft EIR for further discussion). Furthermore, the Project would be located along Sunset Boulevard, which is characterized as a high pedestrian area and also within proximity to the Hollywood Entertainment District to the north. Thus, the Project would encourage and promote walkability in the Project Site vicinity.

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions, SCAG	Consistent. As previously discussed, the Project would encourage healthy lifestyles through the provision of 1,279 bicycle parking spaces on-site. In addition, the Project would provide various recreational facilities to serve the needs of Project residents and pedestrian walkways throughout the Project Site. Furthermore, the Project would also promote walking by improving sidewalks and streetscape in the vicinity of the Project Site. The Project would substantially enhance the pedestrian realm with new lighting, landscaping, and sidewalks that are compliant with the requirements of the Americans with Disabilities Act (ADA). Additionally, the Project would include open space and green space, consisting of a series of integrated walkways and pedestrian paseo that would extend diagonally from Sunset Boulevard from the front of Crossroads of the World to the northwestern corner of the Project Site at Highland Avenue and Selma Avenue.
Seek partnerships with state, regional, and local agencies to acquire funding sources for innovative planning projects.	Local Jurisdictions, SCAG, State	Not Applicable. The Project would not impair the City's, SCAG's or the state's ability to seek partnerships in furtherance of funding acquisition.
Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the 2012–2035 RTP/SCS Plan Alternative, or that have been formally adopted by any subregional COG that is consistent with regional goals.	Local Jurisdictions	Not Applicable. While this action/strategy is not directly applicable, the Project would support this action/strategy via consistency with SCAG's 2016–2040 RTP/SCS, as demonstrated above. Specifically, as discussed in Section IV.H, Land Use, of the Draft EIR, the Project would be consistent with the goals and policies in SCAG's 2016–2040 RTP/SCS, including goals and policies related to land use and housing, water, energy, air quality, solid waste, and transportation.
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	Not Applicable. While this action/strategy is not directly applicable, the Project would support this action/strategy by creating a mixed-use development, comprising complementary uses that offer housing, employment, shopping, recreation, and other community-serving activities and opportunities that will contribute to the resiliency and vitality of neighborhoods.
Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs for a variety of skills and education,	Local Jurisdictions, SCAG	Consistent. As noted above, the Project would create a mixed-use, infill development, consisting of residential, hotel, office, and commercial/retail uses and in proximity to jobs, destinations, and other neighborhood services. Commercial uses are located in the immediate vicinity of the Project Site, including a regional shopping center, strip malls,

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance.		hotels, museums, and restaurants along Sunset Boulevard, Highland Avenue, and Hollywood Boulevard. The Project Site would also include 185,000 square feet of commercial/retail uses and recreational amenities, including roof decks and pools, community rooms and recreational facilities, courtyards, landscaped gardens, and common open space with gathering and seating areas, totaling 85,169 square feet. Additionally, the Project includes a range of residential housing choices, including affordable housing, to serve the needs of a growing and increasingly diverse population within the City of Los Angeles.
Pursue joint development opportunities to encourage the development of housing and mixed-use projects around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas.	Local Jurisdictions, CTCs	Not Applicable. The Project would not impair the City's, or CTC's ability to pursue joint development opportunities. However, the Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area within an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major employment centers in furtherance of SB 375 policies.
Working with local jurisdictions, identify resources that can be used for employing strategies to maintain and assist in the development of affordable housing.	SCAG, Local Jurisdictions	Not Applicable. The Project would not impair the City's, or SCAG's ability to identify resources that can be used for employing strategies to maintain and assist in the development of affordable housing. However, the Project includes a range of residential housing sizes and styles to serve the needs of a growing and increasingly diverse population within the City. The Project proposes 84 affordable housing rental units.
Consider developing healthy community or active design guidelines that promote physical activity and improved health.	Local Jurisdictions	Consistent. While this action/strategy is not directly applicable, the Project, as discussed above, would encourage healthy lifestyles through the provision of bicycle parking. Additionally, the Project would provide various recreational facilities to serve the needs of Project residents and pedestrian walkways throughout the Project Site to promote, encourage, and increase pedestrian activities in the area.
Support projects, programs, policies, and regulations to protect resource areas, such as natural habitats and farmland, from future development.	Local Jurisdictions, SCAG	Consistent. The Project would not impair the City or SCAG's ability to support projects, programs, policies, and regulations to protect resource areas, such as natural habitats and farmland, from future development. Furthermore, the Project is not located in an area that would impact such resource areas.

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State, SCAG	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the state. However, the Project would be consistent with the goals of SB 375, including the goal to reduce VMT and the corresponding emission of GHGs, as demonstrated by this policy-level analysis.
Continue partnership with regional agencies to increase availability of state funding for integrated land use and transportation projects in the region.	State, SCAG	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the state. The Project would not impair the ability of SCAG and the state to increase the availability of funding for integrated land use and transportation projects in the region.
Engage in a strategic planning process to determine the critical components and implementation steps for identifying and addressing open space resources, including increasing and preserving park space, specifically in park-poor communities.	Local Jurisdictions, SCAG	Not Applicable. The Project would not impair the ability of the City and SCAG to engage in strategic planning processes to address recreational/park shortages in existing communities. Moreover, the Project would include approximately 108,611 square feet of open space.
Identify and map regional priority conservation areas for potential inclusion in future plans.	SCAG	Not Applicable. The responsible party identified in the 2016–2040 RTP/SCS for implementation of this action/strategy is SCAG. The Project would not impair SCAG's ability to identify and map regional priority conservation areas for potential inclusion in future plans.
Engage with various partners, including CTCs and local agencies, to determine priority conservation areas and develop an implementable plan.	SCAG, CTCs	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to engage with various partners on issues pertaining to conservation areas.
Develop regional mitigation policies or approaches for the 2016 RTP.	SCAG, CTCs	Not Applicable. The responsible parties identified in the Updated Plan for implementation of this action/strategy are SCAG and CTCs.
Transportation Network Actions and Strategies		
Perform and support studies with the goal of identifying innovative transportation strategies that enhance mobility and air quality, and determine practical steps to pursue such strategies, while engaging local communities in planning efforts.	SCAG, CTCs	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to perform and support various studies to identify innovative transportation strategies. However, by combining proposed residential and commercial (retail/office) uses on-site, the Project would serve to reduce vehicle trips and thus VMT, thereby contributing to a reduction in air pollutant emissions. The Project would also incorporate measures to

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
		reduce air emissions (see Section IV.B, Air Quality, of this Draft EIR).
Cooperate with stakeholders, particularly county transportation commissions and Caltrans, to identify new funding sources and/or increased funding levels for the preservation and maintenance of the existing transportation network.	SCAG, CTCs, Local Jurisdictions	Not Applicable. While the Project would not impair the ability of SCAG, the CTCs, or the City to cooperate with stakeholders to identify new funding sources and/or increase funding levels, the Project would support this action/strategy by providing an on-site circulation network to improve local access, which include providing pedestrian paseo and walkways and realigning Las Palmas Avenue, with appropriate design considerations to ensure travel safety and reliability.
Expand the use of transit modes in our subregions such as BRT, rail, limited-stop service, and point-to-point express services utilizing the HOV and HOT lane networks.	SCAG, CTCs, Local Jurisdictions	Not Applicable. The Project would not impair the ability of SCAG, the CTCs, or the City to expand and extend the use of other transit modes to the Project Site. However, the Project is well-served by transit and would implement a TDM Program that would encourage the use of various transit modes.
Encourage transit providers to increase frequency and span of service in TOD/HQTA and along targeted corridors where cost-effective and where there is latent demand for transit usage.	SCAG, CTCs	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to encourage transit providers to increase the frequency and span of service in the Project area, which is considered a HQTA. Furthermore, the Project would benefit from this action/strategy as the Project is located within a TOD/HQTA.
Encourage regional and local transit providers to develop rail interface services at Metrolink, Amtrak, and high-speed rail stations.	SCAG, CTCs, Local Jurisdictions	Not Applicable. While this action/strategy is not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG, CTCs, or the City to encourage rail interface services.
Expand the Toolbox Tuesdays program to include bicycle safety design, pedestrian safety design, ADA design, training on how to use available resources that expand understanding of where collisions are happening, and information on available grant opportunities to improve bicycle and pedestrian safety.	SCAG, State	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the state. However, the Project would support this action/strategy by complying with the requirements of the Engineering Division of the City's Bureau of Street Services to ensure that the design of the Project's bikeways and pedestrian paths, as well as bicycle and pedestrian access to and from the Project Site, avoid bicycle/pedestrian conflicts and bicycle/vehicle conflicts and promote safe interactions among all the uses on-site.
Prioritize transportation investments to support compact infill development that includes a mix of land uses, housing options, and open/park	SCAG, CTCs, Local	Consistent. As discussed above, the Project is a mixed-use, infill development, consisting of residential, hotel, office, and commercial/retail uses and in proximity to jobs, destinations, and other

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
space, where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.	Jurisdictions	neighborhood services. The Project includes a range of residential housing sizes, including affordable housing units, and styles to serve the needs of a growing and increasingly diverse population within the City. Furthermore, in support of this action/strategy, the Project would provide a variety of open space and recreational amenities.
Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative fueled vehicles.	SCAG, CTCs, Local Jurisdictions	Consistent. The Project is a bicycle-friendly, mixed-use development and would provide a distribution of various uses throughout an eight-acre site that would encourage residents and employees to walk to on-site restaurants and community-serving retail. The Project would promote a pedestrian-friendly community by connecting the entire Project Site through a paseo running across three city blocks and landscape walkways. The Project Site is also located in a HQTAs as designated by the 2016–2040 RTP/SCS. In addition, the publicly-accessible open space areas proposed by the Project would promote walkability in the vicinity of the Project Site. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors. By combining these uses, the Project would serve to reduce vehicle trips and thus VMT, thereby contributing to a reduction in air pollutant emissions. Moreover, the Project is well-served by transit and would implement a TDM Program that would encourage transit use.
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG, CTCs, Local Jurisdictions	Not Applicable. While this action/strategy is not directly applicable to the project, the Project's residential units would be located within walking distance of existing and proposed neighborhood supporting commercial uses, thus reducing the number and length of vehicle trips. The Project Site is also located in a HQTAs as designated by the 2016–2040 RTP/SCS. Moreover, the Project is well-served by transit and would implement a TDM Program that would encourage transit use.
Collaborate with local jurisdictions to provide a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers providing an incentive for residents and employees to make trips on transit.	SCAG, CTCs, Local Jurisdictions	Not Applicable. The Project would not impair the ability of SCAG, the CTCs, or the City to provide a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers. Moreover, as discussed above, the Project's residential units would be located within walking distance of existing and proposed neighborhood supporting commercial uses and local and regional transit, including the Metro Red Line

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
		Hollywood/Highland Station (0.13 mile northwest of the Project Site).
Similar to SCAG's partnership with the City of Los Angeles and LACMTA, offer to all County Transportation Commissions a mutually funded, joint first mile/last mile study for each region.	SCAG, CTCs	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair SCAG's or the CTCs' ability to offer the mutually-funded first-mile/last-mile study for each of the CTC regions.
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV options.	CTCs, Local Jurisdictions	Consistent. The Project would not impair the CTCs' or the City's ability to develop first-mile/last-mile strategies. In support of this action/strategy, the Project's residential units would be located within walking distance of existing and proposed neighborhood supporting commercial uses and local and regional transit, including the Metro Red Line Hollywood/Highland Station (0.13 mile northwest of the Project Site). Moreover, the Project is well-served by transit and would implement a TDM Program to encourage transit use. The Project, as described under Project Design Feature C-4, would provide EV-ready parking spaces equal to 20 percent of the total Code required parking spaces. As previously discussed, the Project would provide 1,279 bicycle parking spaces on-site. Furthermore, the Project would also promote walking by improving sidewalks and streetscape in the vicinity of the Project Site and by including open space and green space, consisting of a series of integrated walkways and a pedestrian paseo that would extend diagonally from Sunset Boulevard from the front of Crossroads of the World to the northwestern corner of the Project Site at Highland Avenue and Selma Avenue.
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media.	Local Jurisdictions	Consistent. As discussed further in Section IV.L, Traffic, Access, and Parking, under Mitigation Measure L-1, the Project would implement a TDM Program, which would include incentives for using alternative travel modes such as providing eligible employees with discounted monthly transit passes. (Please see Section IV.L, Traffic, Access, and Parking, for further detail).
Work with transit properties and local jurisdictions to identify and remove barriers to maintaining on-time performance.	SCAG, CTCs, Local Jurisdictions	Not Applicable. The Project would not impair the SCAG's, CTCs', or the City's ability to work with transit properties to remove barriers to maintain on-time performance.

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Develop policies and prioritize funding for strategies and projects that enhance mobility and air quality.	State	Not Applicable. The responsible party identified in the 2016–2040 RTP/SCS for implementation of this action/strategy is the state. The Project would not impair the state's ability to develop and prioritize funding for strategies and projects that enhance mobility and air quality.
Work with the California High-Speed Rail Authority and local jurisdictions to plan and develop optimal levels of retail, residential, and employment development that fully take advantage of new travel markets and rail travelers.	State	Not Applicable. The responsible party identified in the 2016–2040 RTP/SCS for implementation of this action/strategy is the state. The Project would not impair the State from working with the California High-Speed Rail Authority and local jurisdictions to plan and develop optimal levels of retail, residential, and employment development.
Work with state lenders to provide funding for increased transit service in TOD/HQTA in support of reaching SB 375 goals.	SCAG, State	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the state. The Project would not impair the SCAG or State from working with state lenders to provide funding for increased transit services in TOD/HQTA.
Continue to work with neighboring Metropolitan Planning Organizations (MPO) to provide alternative modes for interregional travel, including Amtrak and other passenger rail services and an enhanced bikeway network, such as on river trails.	SCAG, State	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the state. The Project would not impair the collaboration of SCAG, State, and MPOs to provide alternative modes for interregional travel.
Encourage the development of new, short haul, cost-effective transit services such as DASH and demand responsive transit (DRT) in order to both serve and encourage development of compact neighborhood centers.	CTCs, Municipal Transit Operators	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are CTCs and Municipal Transit Operators. The Project would not impair the development of new, short haul, cost-effective transit services such as DASH and demand responsive transit (DRT).
Work with the state legislature to seek funding for Complete Streets planning and implementation in support of reaching SB 375 goals.	SCAG, State	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the state. The Project would not impair the state legislature to seek funding for Complete Streets planning and implementation in support of reaching SB 375 goals.
Continue to support the California Interregional Blueprint as a plan that links statewide transportation goals and regional transportation and land use goals to produce a unified transportation strategy.	SCAG	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and the state. Nonetheless, as previously discussed, the Project would address land use and transportation concerns via development of a mixed-use community with mutually supportive uses, public services, and amenities, in proximity to the regional roadway

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
		network. Furthermore, the Project is located in a HQTA, which is defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors that are within 0.5 mile of a well-served transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours (see Section IV.H, Land Use, of this EIR for further details).
Transportation Demand Management (TDM) Actions and Strategies		
Examine major projects and strategies that reduce congestion and emissions and optimize the productivity and overall performance of the transportation system.	SCAG	Not Applicable. The responsible party identified in the 2016–2040 RTP/SCS for implementation of this action/strategy is SCAG. However, in support of this action/strategy, the Project includes a TDM Program that includes promotion and support of carpools and rideshare, guaranteed ride home program, flexible or alternative work schedules, and incentives for using alternative work schedules, among other strategies, to reduce congestion and emissions. As shown in Table IV.C-9 on page IV.C-54, the Project GHG emissions from mobile sources would represent a reduction of approximately 45 percent in comparison to the NIERM scenario.
Develop comprehensive regional active transportation network along with supportive tools and resources that can help jurisdictions plan and prioritize new active transportation projects in their cities.	SCAG, CTCs, Local Jurisdictions	Not Applicable. The Project would not impair the SCAG's, CTCs', or the City's ability to develop a comprehensive regional active transportation.
Encourage the implementation of a Complete Streets policy that meets the needs of all users of the streets, roads and highways—including bicyclists, children, persons with disabilities, motorists, neighborhood electric vehicle (NEVs) users, movers of commercial goods, pedestrians, users of public transportation and seniors—for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the region.	Local Jurisdictions, COGs, SCAG, CTCs	Consistent. In support of AB 1358, the Project includes 209 short-term and 1,064 long-term bicycle parking spaces. In addition, the Project, as described under Project Design Feature C-4, would provide EV-ready parking spaces equal to 20 percent of the total Code required parking spaces.
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	Consistent. While the land uses proposed as part of the Project would not include any work-based programs, as part of the TDM Program, discussed further in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, the Project would include programs that encourage emission reduction strategies, such as promotion and support of carpools and rideshare,

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
		guaranteed ride home program, flexible or alternative work schedules, and incentives to using alternative travel modes, among others.
Develop infrastructure plans and educational programs to promote active transportation options and other alternative fueled vehicles, such as neighborhood electric vehicles (NEVs), and consider collaboration with local public health departments, walking/biking coalitions, and/or Safe Routes to School initiatives, which may already have components of such educational programs in place.	Local Jurisdictions	Not Applicable. The Project would not impair the City's ability to develop infrastructure plans and education programs to promote active transportation options and other alternative fueled vehicles. Moreover, the Project includes 209 short-term and 1,064 long-term bicycle parking spaces. In addition, the Project would provide various recreational facilities to serve the needs of Project residents and pedestrian walkways throughout the Project Site. The Project also includes implementation of a TDM program which would include various programs to promote active transportation and other alternative fueled vehicles. These programs include incentives for using alternative travel modes and bicycle amenities. Furthermore, as described under Project Design Feature C-4, would provide EV-ready parking spaces equal to 20 percent of the total Code required parking spaces.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	Consistent. As part of the TDM Program, discussed further in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, the Project would include work-based programs that encourage emission reduction strategies. For example, the TDM program would include a transportation management coordinator (TMC) which would reach out to employers to promote telecommuting options.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	SCAG, Local Jurisdictions	Consistent. The Project would not impair the City's ability to develop infrastructure plans and education programs to promote active transportation options and other alternative fueled vehicles. The Project, as described under Project Design Feature C-4, would provide EV-ready parking spaces equal to 20 percent of the total Code required parking spaces. Moreover, the Project includes 209 short-term and 1,064 long-term bicycle parking spaces.
Transportation System Management (TSM) Actions and Strategies		
Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system.	SCAG, Local Jurisdictions,	Consistent. The Project would not impair the ability of SCAG, the City, or the state to work with relevant transportation authorities to increase the efficiency of the existing transportation system. The Project would include an on-site circulation network. Specifically, the Project would include the development of a paseo and walkways and the

Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
		realignment of Las Palmas Avenue. All such improvements would be constructed in accordance with City requirements, as appropriate. Moreover, the Project is well-served by transit and would implement a TDM Program that would encourage transit use.
Collaborate with local jurisdictions and subregional COGs to develop regional policies regarding TSM.	SCAG, COGs, Local Jurisdictions	Consistent. The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on the development of regional TSM policies. All Project transportation-related improvements as identified in Section IV.L, Traffic, Access, and Parking, of this Draft EIR would be developed in consultation with LADOT and/or transit service providers, as appropriate, and constructed in compliance with their respective standards.
Contribute to and utilize regional data sources to ensure efficient integration of the transportation system.	SCAG, CTCs	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. However, as discussed in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, the Project traffic analysis is based on a traffic model developed by LADOT as the primary tool for forecasting traffic volumes within the City of Los Angeles. In addition, SCAG’s regional data, including population, housing, and employment forecasts, are used where appropriate throughout this Draft EIR.
Provide training opportunities for local jurisdictions on TSM strategies, such as Intelligent Transportation Systems (ITS).	SCAG, Local Jurisdictions	Not Applicable. The Project would not impair the ability of SCAG or the City to provide TSM strategy training.
Collaborate with local jurisdictions and subregional COGs to continually update the ITS inventory.	SCAG, COGs, Local Jurisdictions	Not Applicable. The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on updates to the ITS inventory. See the discussion directly above regarding the Project’s support of transportation system management strategies.
Collaborate with CTCs to regularly update the county and regional ITS architecture.	SCAG, CTCs, Local Jurisdictions	Not Applicable. The Project would not impair the ability of SCAG, the CTCs, or the City to collaborate on updates to the ITS architecture. See the discussion above regarding the Project’s support of transportation system management strategies.
Collaborate with the state and federal Government and subregional COGs to examine potential innovative TDM/TSM strategies.	SCAG, State, COGs	Not Applicable. The responsible parties identified in the 2016–2040 RTP/SCS for implementation of this action/strategy are SCAG, the state, and the COGs. The Project would not impair the collaboration of the state and federal Government and subregional COGs to examine potential innovative TDM/TSM strategies.

**Table IV.C-17 (Continued)
Consistency Analysis—2016–2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Clean Vehicle Technology Actions and Strategies		
Develop a Regional PEV Readiness Plan with a focus on charge port infrastructure plans to support and promote the introduction of electric and other alternative fuel vehicles in Southern California.	SCAG	Not Applicable. The responsible party identified in the 2016–2040 RTP/SCS for implementation of this action/strategy is SCAG. The Project would not impair the development of a regional PEV Readiness Plan. Moreover, in support of this action/strategy, the Project would provide at least 20 percent of the total code-required parking spaces for the Project to be capable of supporting future EVSE as dictated by Project Design Feature C-4.
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. The activities committed in the two subregions (Western Riverside COG and South Bay Cities COG) are put forward as best practices that others can adopt in the future. (See Appendix: Vehicle Technology, for more information.)	SCAG, Local Jurisdictions	Not Applicable. While the acceleration of fleet conversion by the Project’s future residents and occupants is market driven and beyond the direct control or influence of the Project Applicant, the Project would not impair the City’s or SCAG’s ability to support subregional strategies in furtherance of that conversion.
<p>SCAG = Southern California Association of Governments HCD = California Department of Housing and Community Development COG = subregional council of governments CTCs = county transportation commissions TOD = transit-oriented development HQTA = High Quality Transit Area PEV = plug-in electric vehicle Source: SCAG 2012–2035 RTP/SCS, Chapter 4: Sustainable Communities Strategy, Tables 4.3 through 4.7; April 2012.</p>		

Green Code (Chapter IX, Article 9, of the Los Angeles Municipal Code, as amended pursuant to City of Los Angeles Ordinance No. 182,849), incorporated by reference the mandatory requirements of the 2013 California Green Building Standards Code (discussed above under *Climate Change Scoping Plan*). The Project would comply with performance-based standards included in the Green Building Code (e.g., 2013 Building Energy Efficiency Standards). In addition, Project Design Feature C-1 would serve to further reduce GHG emissions by requiring new buildings and infrastructure to be designed to be environmentally sustainable and to achieve the standards of the Silver Rating under

**Table IV.C-18
Consistency with Applicable GHG Emissions Goals and Actions of LA Green Plan**

Action	Description	Consistency Analysis
Focus Area: Energy		
E6	Present a comprehensive set of green building policies to guide and support private sector development.	Consistent. While this action primarily applies to the City, the Project would be designed and operated to meet or exceed the applicable requirements of the state Green Building Standards Code and the City of Los Angeles Green Building Code and meet the standards of the USGBC LEED Silver level or its equivalent where applicable, as required under Project Design Feature C-1.
Focus Area: Water		
W1	Meet all additional demand for water resulting from growth through water conservation and recycling.	Consistent. While this action primarily applies to the City and LADWP, the Project would incorporate water conservation features to reduce indoor water use by at least 35 percent; plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) that comply with the performance requirements specified in the City of Los Angeles Green Building Code; weather-based irrigation system; and water-efficient landscaping. Further detail is provided in Section IV.M.1, Utilities and Service Systems—Water Supply and Infrastructure. The Mayor’s Office and LADWP developed the <i>Securing LA’s Water Supply</i> plan, which is an aggressive, multi-faceted approach to developing a locally sustainable water supply. The plan includes a set of key short-term and long-term strategies to secure our water future, such as: Short-Term Conservation Strategies: <ul style="list-style-type: none">• Enforcing prohibited uses of water (levying fines and sanctions against water abusers and increase water conservation awareness).• Expanding the list of prohibited uses of water (possible further restrictions on watering landscape and washing/rinsing vehicles without a self-closing nozzle).• Extending outreach efforts, water conservation incentives, and rebates.• Encouraging regional conservation measures (encourage all water agencies in the region to adopt water conservation ordinances which include prohibited uses and enforcement). Long-Term Conservation Strategies: <ul style="list-style-type: none">• Increasing water conservation through reduction of outdoor water use and new technology.• Maximizing water recycling.

Table IV.C-18 (Continued)
Consistency with Applicable GHG Emissions Goals and Actions of LA Green Plan

Action	Description	Consistency Analysis	
	<ul style="list-style-type: none"> • Enhancing stormwater capture. • Accelerating clean-up of the groundwater basin. • Expanding groundwater storage. 		
W2	Reduce per capita water consumption by 20 percent.	[See W1, above.]	[See W1, above.]
Focus Area: Transportation			
T4	Complete the Automated Traffic Surveillance and Control System (ATSAC).	This action reduces vehicle emissions that result from idling at intersections. By reducing vehicle stops, delays and travel time through improved traffic signal timing, vehicles can travel a longer distance at a consistent rate of speed, improving fuel economy.	Consistent. While this action primarily applies to the City, the Project would include implementation of Mitigation Measure L-2 through L-4, set forth in Section IV.L, Traffic, Access, and Parking, of the Draft EIR, which would provide funding to LADOT for improvements to four intersections.
T6	Make transit information easily available, understandable, and translated into multiple languages.	A LADOT partnership with the Personnel Department will enable LADOT to determine in which additional languages transit information should be provided. Facilitating access to transit information increases the likelihood of transit use, which can reduce single occupancy vehicle trips and help alleviate traffic congestion, and most importantly, reducing associated GHG emissions.	Consistent. While this action primarily applies to the City, the Project Applicant would implement a TDM Program pursuant to Mitigation Measure L-1, set forth in Section IV.L, Traffic, Access, and Parking, of the Draft EIR. The TDM Program would promote making transit information easily available by providing education programs to reach out to employers and employees and by including a Transportation Information Center which would be a centrally-located community information center where individuals may obtain real-time information for planning travel without using an automobile.
T8	Promote walking and biking to work, within neighborhoods, and to large events and venues.	Promoting alternate modes of travel will reduce the carbon emissions associated with SOVs. As described in Action Items LU1 and LU2, the City is promoting high-density and mixed-use housing close to major transportation arteries. Such developments will also support the advancement of Action Item T8, by improving accessibility for those who wish to walk and bike to work.	Consistent. While this action primarily applies to the City, the Project would promote a pedestrian-friendly community by connecting the entire Project Site through a paseo and landscape walkways. The Project Site is also located in a HQTA as designated by the 2016–2040 RTP/SCS. In addition, the publicly-accessible open space areas proposed by the Project would promote walkability in the vicinity of the Project Site. Furthermore, the Project is within 1,000 feet of large

Table IV.C-18 (Continued)
Consistency with Applicable GHG Emissions Goals and Actions of LA Green Plan

Action		Description	Consistency Analysis
			venues, such as the Dolby Theater, El Capitan Theatre, and the Egyptian Theatre, among others, as well as commercial job centers, such as the Hollywood & Highland Center and the commercial uses along Sunset Boulevard and Hollywood Boulevard. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors.
Focus Area: Land Use			
LU2	Promote and implement transit-oriented development (TOD).	TODs represent opportunities for creating cohesive, vibrant, walkable communities where fragmented, auto-dependent corridors now exist. TODs are a positive alternative to low-density traditional land use patterns that typically segregate housing, jobs and neighborhood services from one another. In contrast, TODs cluster these community elements in close proximity, so a greater portion of trips can be made by transit, bike, or on foot.	Consistent. The Project constitutes a TOD as the Project would concentrate new residential, employment, and commercial/retail uses in proximity to public transit opportunities (e.g., rail and bus routes). The study area is well-served by public transit, including both bus and rail service. Metro provides 18 bus lines in the form of both rapid and local bus service, as well as one subway line in the study area. DASH also provides local bus transit service in the area.
Focus Area: Waste			
WsT1	Reduce or recycle 70 percent of trash by 2015.	Source reduction and recycling programs not only conserve natural resources and landfill space, but also confer climate benefits.	Consistent. While this action primarily applies to the City, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that developments include a recycling area of specified size on the Project Site. In addition, Project Design Feature M.3-1, discussed further in Section IV.M.3, Utilities and Service Systems—Solid Waste, states that the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material.
<p>Source: <i>Eyestone Environmental, 2016.</i></p>			

the U.S. Green Building Council's LEED® green building program or equivalent green building standards.

(e) *Conclusion*

In summary, this regulatory compliance analysis provided above demonstrates that the Project's design features substantially comply with or exceed the regulations and reduction actions/strategies outlined in CARB's *Climate Change Scoping Plan*, AB 900, SCAG's 2016–2040 RTP/SCS , and the City of Los Angeles LA Green Plan.

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

With regard to AB 900, the Project would not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with PRC Section 21183(c) with the purchase of emission offset credits. Therefore, the Project would meet the GHG emissions requirements for streamlined environmental review under CEQA.

As part of SCAG's 2016–2040 RTP/SCS, a reduction in VMT within the region is a key component to achieving the 2020 and 2035 GHG emission reduction targets established by CARB. As shown in Table IV.C-9 on page IV.C-54, the Project results in a VMT reduction of approximately 45 percent in comparison to NIERM and would be consistent with SCAG's 2016–2040 RTP/SCS.

The Project also would comply with the LA Green Plan, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's compliance with regulatory measures and Project Design Features provided above and throughout the Draft EIR and implementation of mitigation measures, particularly Mitigation Measure L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, would advance these objectives.

4. Cumulative Impacts

Although the Project is expected to emit GHGs, the emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect.

Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change.⁹² The state has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce are predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represents new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064h(3), the City, as lead agency, has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emissions: CARB's *Climate Change Scoping Plan*, AB 900, SCAG's 2016–2040 RTP/SCS, and the LA Green Plan.

Table IV.C-12 on page IV.C-57 illustrates that implementation of the Project's regulatory requirements, Mitigation Measure L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, and Project Design Features, including state mandates, would reduce GHG emissions. These reductions represent a reduction from NIERM. The Project also supports state goals for GHG emissions reduction. The methods used to establish this reduction are consistent with the approach used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32.

The Project is consistent with the approach outlined in CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities for achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving GHG emissions reductions as new buildings would be designed to achieve the standards of the Silver Rating under LEED.

⁹² *The Project's GHG emission would comprise 0.003 percent of California's GHG emissions and 0.00004 percent of global emissions in 2012.*

AB 900 establishes procedures for applying for streamlined environmental review under CEQA for Projects that meet certain requirements. The Project Applicant submitted an Application for CEQA Streamlining. As determined therein, the Project would not result in any net additional GHGs, including GHG emissions from employee transportation in accordance with PRC Section 21183(c) with the purchase of emission offset credits.

As part of SCAG's 2016–2040 RTP/SCS, a reduction in VMT within the region is a key component to achieving the 2020 and 2035 GHG emission reduction targets established by CARB. As shown in Table IV.C-12 on page IV.C-57, the Project results in a VMT reduction of approximately 46 percent in comparison to the NIERM scenario and would be consistent with the RTP/SCS.

In addition, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided throughout this Draft EIR, mitigation measures, and Project Design Features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 43-percent reduction in GHG emissions from the NIERM scenario. The Project's GHG reduction measures make the Project consistent with AB 32.

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

The Project also would comply with the LA Green Plan, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory requirements and Project Design Features provided above and throughout this Draft EIR and Mitigation Measure L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, would advance these objectives. Furthermore, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code).

As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The NIERM comparison and SCAQMD's draft service population target demonstrate the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap-and-Trade Program, that Program would indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program would backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions if California's direct regulatory measures reduce GHG

emissions less than expected. The Cap-and-Trade Program would ensure that the GHG reduction targets of AB 32 are met. Thus, given the Project's consistency with state, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

5. Mitigation Measures

As part of the Project, the Project Applicant would comply with applicable LA Green Plan requirements as set forth throughout this Draft EIR and specific Project Design Features to further support and promote environmental sustainability. These features include compliance with regulatory requirements, including the provisions set forth in the CALGreen Code that have been incorporated into the City of Los Angeles Green Building Code. These features also include energy conservation, water conservation, and waste reduction features. With implementation of regulatory requirements and Project Design Features, including those provided above, and Mitigation Measure L-1 in Section IV.L, Traffic, Access, and Parking, of this Draft EIR, impacts related to GHG emissions would be less than significant.

6. Level of Significance After Mitigation

Project impacts related to GHG emissions would be less than significant.