

5. Environmental Analysis

5.3 GREENHOUSE GAS EMISSIONS

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the Proposed Project to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough to result in a measurable increase in global concentrations of GHG, climate change impacts of a project are considered on a cumulative basis.

This evaluation is based on the methodology recommended by the South Coast Air Quality Management District (SCAQMD). Transportation-sector impacts for the Proposed Project are based on average daily vehicle trips and vehicle miles traveled compiled by PlaceWorks in Appendix F as part of traffic analysis in Section 5.6, *Transportation and Traffic*. GHG emissions modeling was conducted using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2, and model outputs are in Appendix C of this DEIR.

Terminology

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide (CO₂) over a given period of time (20, 100, and 500 years). CO₂ has a GWP of 1.
- **Carbon dioxide-equivalent (CO₂e).** The standard unit to measure the amount of greenhouse gases in terms of the amount of CO₂ that would cause the same amount of warming. CO₂e is based on the GWP ratios between the various GHGs relative to CO₂.
- **MTCO₂e.** Metric ton of CO₂e.
- **MMTCO₂e.** Million metric tons of CO₂e.

5.3.1 Environmental Setting

5.3.1.1 GREENHOUSE GASES AND CLIMATE CHANGE

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHGs, to the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed in the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent are nitrous oxide (N₂O), sulfur hexafluoride (SF₆),

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hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).^{1,2} The major GHGs are briefly described.

- **Carbon dioxide (CO₂)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH₄)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.
- **Nitrous oxide (N₂O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.
- **Fluorinated gases** are synthetic, strong GHGs that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for ozone-depleting substances. These gases are typically emitted in smaller quantities, but because they are potent GHGs, they are sometimes referred to as high GWP gases.
 - **Chlorofluorocarbons (CFCs)** are GHGs covered under the 1987 Montreal Protocol and used for refrigeration, air conditioning, packaging, insulation, solvents, or aerosol propellants. Since they are not destroyed in the lower atmosphere (troposphere, stratosphere), CFCs drift into the upper atmosphere where, given suitable conditions, they break down the ozone layer. These gases are therefore being replaced by other compounds that are GHGs covered under the Kyoto Protocol.
 - **Perfluorocarbons (PFCs)** are a group of human-made chemicals composed of carbon and fluorine only. These chemicals (predominantly perfluoromethane [CF₄] and perfluoroethane [C₂F₆]) were introduced as alternatives, along with hydrofluorocarbons (HFCs), to ozone-depleting substances. In addition, PFCs are emitted as by-products of industrial processes and are used in manufacturing. PFCs do not harm the stratospheric ozone layer, but they have a high GWP.
 - **Sulfur Hexafluoride (SF₆)** is a colorless gas soluble in alcohol and ether, and slightly soluble in water. SF₆ is a strong GHG used primarily in electrical transmission and distribution systems as an insulator.

¹ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant because it is considered part of the feedback loop rather than a primary cause of change.

² Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2017a). However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

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- *Hydrochlorofluorocarbons (HCFCs)* contain hydrogen, fluorine, chlorine, and carbon atoms. Although they are ozone-depleting substances, they are less potent than CFCs. They have been introduced as temporary replacements for CFCs.
- *Hydrofluorocarbons (HFCs)* contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone-depleting substances to serve many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing. They do not significantly deplete the stratospheric ozone layer, but they are strong GHGs. (IPCC 1995; USEPA 2018)

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 5.3-1, *GHG Emissions and their Relative Global Warming Potential Compared to CO₂*. The GWP is used to convert GHGs to CO₂-equivalence to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Fourth Assessment Report (AR4) GWP values for CH₄, 10 MT of CH₄ would be equivalent to 250 MT of CO₂.

Table 5.3-1 GHG Emissions and Their Relative Global Warming Potential Compared to CO₂

GHGs	Second Assessment Report Atmospheric Lifetime (Years)	Fourth Assessment Report Atmospheric Lifetime (Years)	Second Assessment Report Global Warming Potential Relative to CO ₂ ¹	Fourth Assessment Report Global Warming Potential Relative to CO ₂ ¹
Carbon Dioxide (CO ₂)	50 to 200	50 to 200	1	1
Methane ² (CH ₄)	12 (±3)	12	21	25
Nitrous Oxide (N ₂ O)	120	114	310	298
Hydrofluorocarbons:				
HFC-23	264	270	11,700	14,800
HFC-32	5.6	4.9	650	675
HFC-125	32.6	29	2,800	3,500
HFC-134a	14.6	14	1,300	1,430
HFC-143a	48.3	52	3,800	4,470
HFC-152a	1.5	1.4	140	124
HFC-227ea	36.5	34.2	2,900	3,220
HFC-236fa	209	240	6,300	9,810
HFC-4310mee	17.1	15.9	1,300	1,030
Perfluoromethane: CF ₄	50,000	50,000	6,500	7,390
Perfluoroethane: C ₂ F ₆	10,000	10,000	9,200	12,200
Perfluorobutane: C ₄ F ₁₀	2,600	NA	7,000	8,860
Perfluoro-2-methylpentane: C ₆ F ₁₄	3,200	NA	7,400	9,300

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Table 5.3-1 GHG Emissions and Their Relative Global Warming Potential Compared to CO₂

GHGs	Second Assessment Report Atmospheric Lifetime (Years)	Fourth Assessment Report Atmospheric Lifetime (Years)	Second Assessment Report Global Warming Potential Relative to CO ₂ ¹	Fourth Assessment Report Global Warming Potential Relative to CO ₂ ¹
Sulfur Hexafluoride (SF ₆)	3,200	NA	23,900	22,800

Source: IPCC 1995, 2007.

Notes: The IPCC published updated GWP values in its Fifth Assessment Report (2013) that reflect new information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO₂. However, GWP values identified in AR4 are used by SCAQMD to maintain consistency in statewide GHG emissions modeling. In addition, the 2014 Scoping Plan Update was based on the GWP values in AR4.

¹ Based on 100-year time horizon of the GWP of the air pollutant compared to CO₂.

² The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.

California's GHG Sources and Relative Contribution

California is the 20th largest GHG emitter in the world and the second largest GHG emitter in the United States, surpassed only by Texas (CARB 2014a). However, California also has over 12 million more people than Texas. Because of more stringent air emission regulations, in 2001, California ranked third lowest in energy-related carbon emissions per capita (EIA 2017).

In 2016, the statewide GHG emissions inventory was updated for 2000 to 2014 emissions using the GWPs in IPCC's AR4.³ Based on these GWPs, California produced 442 MMTCO_{2e} GHG emissions in 2014. California's transportation sector was the single largest generator of GHG emissions, producing 36.1 percent of the state's total emissions. Industrial sector emissions made up 21.1 percent, and electric power generation made up 20.0 percent of the state's emissions inventory. Other major sectors of GHG emissions include commercial and residential (8.7 percent), agriculture (8.2 percent), high GWP GHGs (3.9 percent), and recycling and waste (2.0 percent) (CARB 2016).

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the 20th century, however, scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities. The amount of CO₂ in the atmosphere has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million per year since 1960, mainly due to combustion of fossil fuels and deforestation (IPCC 2007). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the earth's temperature changed the distribution of species, availability of water, etc. However, human activities are accelerating this process so that

³ Methodology for determining the statewide GHG inventory is not the same as the methodology used to determine statewide GHG emissions under Assembly Bill 32 (2006).

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environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in frequency of warm spells/heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

Potential Climate Change Impacts for California

Observed changes over the last several decades across the western United States reveal clear signs of climate change. Statewide average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada. By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1 to 8.6°F, depending on emissions levels (CCCC 2012).

In California and western North America, observations of the climate have shown: 1) a trend toward warmer winter and spring temperatures; 2) a smaller fraction of precipitation falling as snow; 3) a decrease in the amount of spring snow accumulation in the lower and middle elevation mountain zones; 4) advanced shift in the timing of snowmelt of 5 to 30 days earlier in the spring; and 5) a similar shift (5 to 30 days earlier) in the timing of spring flower blooms (CAT 2006). According to the California Climate Action Team—a committee of state agency secretaries and the heads of agencies, boards, and departments, led by the Secretary of the California Environmental Protection Agency—even if actions could be taken to immediately curtail climate change emissions, the potency of emissions that have already built up, their long atmospheric lifetimes (see Table 5.3-1), and the inertia of the Earth's climate system could produce as much as 0.6°C (1.1°F) of additional warming. Consequently, some impacts from climate change are now considered unavoidable.

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Global climate change risks to California are shown in Table 5.3-2, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

Table 5.3-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Fewer extremely cold nights Poor air quality made worse Higher temperatures increase ground-level ozone levels
Water Resources Impacts	Decreasing Sierra Nevada snow pack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea level rise Increasing coastal floods Shrinking beaches Worsened impacts on infrastructure
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pest and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: CEC 2006; CEC 2009; CCCC 2012; CNRA 2014.

Specific climate change impacts that could affect the Proposed Project include:

- Water Resources Impacts.** By late this century, all projections show drying, and half of the projections suggest 30-year average precipitation will decline by more than 10 percent below the historical average. This drying trend is caused by an apparent decline in the frequency of rain and snowfall. Even in projections with relatively little or no decline in precipitation, central and southern parts of the state are expected to be drier from the warming effects alone because the spring snowpack will melt sooner, and the moisture in soils will evaporate during long dry summer months (CCCC 2012).

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- **Wildfire Risks.** Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate-related changes in vegetation and ignition potential from lightning. Human activities will continue to be the biggest factor in ignition risk. The number of large fires statewide is estimated to increase by 58 percent to 128 percent above historical levels by 2085. Under the same emissions scenario, estimated burned area will increase by 57 percent to 169 percent, depending on location (CCCC 2012).
- **Health Impacts.** Many of the gravest threats to public health in California stem from the increase of extreme conditions, principally more frequent, more intense, and longer heat waves. Particular concern centers on the increasing tendency for multiple hot days in succession, and simultaneous heat waves in several regions throughout the state. Public health could also be affected by climate change impacts on air quality, food production, the amount and quality of water supplies, energy pricing and availability, and the spread of infectious diseases. Higher temperatures also increase ground-level ozone levels. Furthermore, wildfires can increase particulate air pollution in the major air basins of California (CCCC 2012).
- **Increase Energy Demand.** Increases in average temperature and higher frequency of extreme heat events combined with new residential development across the state will drive up the demand for cooling in the increasingly hot and longer summer season and decrease demand for heating in the cooler season. Warmer, drier summers also increase system losses at natural gas plants (reduced efficiency in the electricity generation process at higher temperatures) and hydropower plants (lower reservoir levels). Transmission of electricity will also be affected by climate change. Transmission lines lose 7 percent to 8 percent of transmitting capacity in high temperatures while needing to transport greater loads. This means that more electricity needs to be produced to make up for the loss in capacity and the growing demand (CCCC 2012).

5.3.1.2 REGULATORY FRAMEWORK

This section describes the federal, state, and local regulations applicable to GHG emissions.

Federal Regulations

The U.S. Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings did not themselves impose any emission reduction requirements, but allowed the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (USEPA 2009).

To regulate GHGs from passenger vehicles, EPA was required to issue an endangerment finding. The finding identifies emissions of six key GHGs—CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and SF₆—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the Proposed Project's GHG emissions inventory because

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they constitute the majority of GHG emissions; per SCAQMD guidance, they are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

US Mandatory Reporting Rule for GHGs (2009)

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 MTCO_{2e} or more per year are required to submit an annual report.

Update to Corporate Average Fuel Economy Standards (2010/2012)

The current Corporate Average Fuel Economy standards (for model years 2011 to 2016) incorporate stricter fuel economy requirements promulgated by the federal government and California into one uniform standard. Additionally, automakers were required to cut GHG emissions in new vehicles by roughly 25 percent by 2016 (resulting in a fleet average of 35.5 miles per gallon by 2016). Rulemaking to adopt these new standards was completed in 2010. California agreed to allow automakers who show compliance with the national program to also be deemed in compliance with state requirements. The federal government issued new standards in 2012 for model years 2017 to 2025 that will require a fleet average of 54.5 miles per gallon in 2025. However, the EPA is reexamining the 2017–2025 emissions standards.

EPA Regulation of Stationary Sources under the Clean Air Act (Ongoing)

Pursuant to its authority under the Clean Air Act, the EPA has been developing regulations for new, large, stationary sources of emissions, such as power plants and refineries. Under former President Obama's 2013 Climate Action Plan, the EPA was directed to develop regulations for existing stationary sources as well. However, the EPA is reviewing the Clean Power Plan under President Trump's Energy Independence Executive Order.

State Regulations

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Orders S-03-05 and B-30-15, Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and SB 375.

Executive Order S-03-05

Executive Order S-03-05, signed June 1, 2005, set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

Assembly Bill 32, the Global Warming Solutions Act (2006)

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in AB 32, the Global Warming Solutions Act. AB 32 was passed by the California state legislature on August 31,

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2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in Executive Order S-03-05.

CARB 2008 Scoping Plan

The final Scoping Plan was adopted by the California Air Resources Board (CARB) on December 11, 2008. The 2008 Scoping Plan identified that GHG emissions in California are anticipated to be 596 MMTCO_{2e} in 2020. In December 2007, CARB approved a 2020 emissions limit of 427 MMTCO_{2e} (471 million tons) for the state (CARB 2008). In order to effectively implement the emissions cap, AB 32 directed CARB to establish a mandatory reporting system to track and monitor GHG emissions levels for large stationary sources that generate more than 25,000 MTCO_{2e} per year, prepare a plan demonstrating how the 2020 deadline can be met, and develop appropriate regulations and programs to implement the plan by 2012.

First Update to the Scoping Plan

CARB completed a five-year update to the 2008 Scoping Plan, as required by AB 32. The First Update to the Scoping Plan, adopted May 22, 2014, highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals defined in the 2008 Scoping Plan. As part of the update, CARB recalculated the 1990 GHG emission levels with the updated AR4 GWPs, and the 427 MMTCO_{2e} 1990 emissions level and 2020 GHG emissions limit, established in response to AB 32, are slightly higher at 431 MMTCO_{2e} (CARB 2014b).

As identified in the Update to the Scoping Plan, California is on track to meeting the goals of AB 32. However, the update also addresses the state's longer-term GHG goals in a post-2020 element. The post-2020 element provides a high level view of a long-term strategy for meeting the 2050 GHG goals, including a recommendation for the state to adopt a midterm target. According to the Update to the Scoping Plan, local government reduction targets should chart a reduction trajectory that is consistent with or exceeds the trajectory created by statewide goals (CARB 2014b). CARB identified that reducing emissions to 80 percent below 1990 levels will require a fundamental shift to efficient, clean energy in every sector of the economy. Progressing toward California's 2050 climate targets will require significant acceleration of GHG reduction rates. Emissions from 2020 to 2050 will have to decline several times faster than the rate needed to reach the 2020 emissions limit (CARB 2014b).

Executive Order B-30-15

Executive Order B-30-15, signed April 29, 2015, sets a goal of reducing GHG emissions in the state to 40 percent below 1990 levels by year 2030. Executive Order B-30-15 also directs CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in Executive Order S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaption strategy, Safeguarding California, in order to ensure climate change is accounted for in state planning and investment decisions.

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Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed Senate Bill 32 and Assembly Bill 197, making the Executive Order goal for year 2030 into a statewide, mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires the CARB to prioritize direction emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

2017 Climate Change Scoping Plan

Executive Order B-30-15 and SB 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. On December 24, 2017, CARB approved the 2017 Climate Change Scoping Plan Update, which outlines potential regulations and programs, including strategies consistent with AB 197 requirements, to achieve the 2030 target. The 2017 Scoping Plan establishes a new emissions limit of 260 MMTCO_{2e} for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030 (CARB 2017b).

California's climate strategy will require contributions from all sectors of the economy, including enhanced focus on zero- and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, such as solar roofs, wind, and other types of distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (methane, black carbon, and fluorinated gases); and an increased focus on integrated land use planning, to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for GHG reductions at stationary sources complement local air pollution control efforts by the local air districts to tighten criteria air pollutants and TACs emissions limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing ZE buses and trucks;
- Low Carbon Fuel Standard (LCFS), with an increased stringency (18 percent by 2030).
- Implementation of SB 350, which expands the Renewables Portfolio Standard (RPS) to 50 percent RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of ZE trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing methane and hydrofluorocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- Continued implementation of SB 375.

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- Development of a Natural and Working Lands Action Plan to secure California’s land base as a net carbon sink.

In addition to the statewide strategies listed above, the 2017 Climate Change Scoping Plan also identified local governments as essential partners in achieving the state’s long-term GHG reduction goals and recommended local actions to reduce GHG emissions, for example, statewide targets of no more than 6 MTCO_{2e} or less per capita by 2030 and 2 MTCO_{2e} or less per capita by 2050. CARB recommends that local governments evaluate and adopt robust and quantitative locally appropriate goals that align with the statewide per capita targets and sustainable development objectives, and develop plans to achieve the local goals. The statewide per capita goals were developed by applying the percent reductions necessary to reach the 2030 and 2050 climate goals (i.e., 40 percent and 80 percent, respectively) to the state’s 1990 emissions limit established under AB 32. For CEQA projects, CARB states that lead agencies have discretion to develop evidenced-based numeric thresholds (mass emissions, per capita, or per service population) consistent with the Scoping Plan and the state’s long-term GHG goals. To the degree a project relies on GHG mitigation measures, CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from vehicle miles traveled (VMT), and direct investments in GHG reductions within the project’s region that contribute potential air quality, health, and economic co-benefits. Where further project design or regional investments are infeasible or not proven to be effective, CARB recommends mitigating potential GHG impacts through purchasing and retiring carbon credits.

The Scoping Plan scenario is set against what is called the “business as usual” yardstick—that is, what would the GHG emissions look like if the state did nothing at all beyond the policies that are already required and in place to achieve the 2020 limit, as shown in Table 5.3-3, *2017 Climate Change Scoping Plan Emissions Reductions Gap*. It includes the existing renewables requirements, advanced clean cars, the “10 percent” LCFS, and the SB 375 program for more vibrant communities, among others. However, it does not include a range of new policies or measures that have been developed or put into statute over the past two years. Also shown in the table, the known commitments are expected to result in emissions that are 60 MMTCO_{2e} above the target in 2030. If the estimated GHG reductions from the known commitments are not realized due to delays in implementation or technology deployment, the post-2020 Cap-and-Trade Program would deliver the additional GHG reductions in the sectors it covers to ensure the 2030 target is achieved.

Table 5.3-3 2017 Climate Change Scoping Plan Emissions Reductions Gap

Modeling Scenario	2030 GHG Emissions MMTCO _{2e}
Reference Scenario (Business-as-Usual)	389
With Known Commitments	320
2030 GHG Target	260
Gap to 2030 Target	60

Source: CARB 2017b.

Table 5.3-4, *2017 Climate Change Scoping Plan Emissions Change by Sector*, provides estimated GHG emissions by sector, compared to 1990 levels, and the range of GHG emissions for each sector estimated for 2030.

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Table 5.3-4 2017 Climate Change Scoping Plan Emissions Change by Sector

Scoping Plan Sector	1990 MMTCO _{2e}	2030 Proposed Plan Ranges MMTCO _{2e}	% Change from 1990
Agricultural	26	24-25	-8% to -4%
Residential and Commercial	44	38-40	-14% to -9%
Electric Power	108	30-53	-72% to -51%
High GWP	3	8-11	267% to 367%
Industrial	98	83-90	-15% to -8%
Recycling and Waste	7	8-9	14% to 29%
Transportation (including TCU)	152	103-111	-32% to -27%
Net Sink ¹	-7	TBD	TBD
Sub Total	431	294-339	-32% to -21%
Cap-and-Trade Program	NA	24-79	NA
Total	431	260	-40%

Source: CARB 2017b.

Notes: TCU = Transportation, Communications, and Utilities; TBD = To Be Determined.

¹ Work is underway through 2017 to estimate the range of potential sequestration benefits from the natural and working lands sector.

Senate Bill 1383

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and CH₄. Black carbon is the light-absorbing component of fine particulate matter produced during incomplete combustion of fuels. SB 1383 requires the state board, no later than January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also establishes targets for reducing organic waste in landfills. On March 14, 2017, CARB adopted the Final Proposed Short-Lived Climate Pollutant Strategy, which identifies the state's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use (CARB 2017a). In-use on-road rules are expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020. SCAQMD is one of the air districts that requires air pollution control technologies for chain-driven broilers, which reduces their particulate emissions by over 80 percent (CARB 2017a). Additionally, SCAQMD Rule 445 limits installation of new fireplaces in the South Coast Air Basin.

Senate Bill 375

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce VMT and

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vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPOs). The Southern California Association of Governments (SCAG) is the MPO for the Southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial.

Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. SCAG's targets are an 8 percent per capita reduction from 2005 GHG emission levels by 2020 and a 13 percent per capita reduction from 2005 GHG emission levels by 2035 (CARB 2010). The 2020 targets are smaller than the 2035 targets because a significant portion of the built environment in 2020 has been defined by decisions that have already been made. In general, the 2020 scenarios reflect that more time is needed for large land use and transportation infrastructure changes. Most of the reductions in the interim are anticipated to come from improving the efficiency of the region's transportation network. The targets would result in 3 MMTCO_{2e} of reductions by 2020 and 15 MMTCO_{2e} of reductions by 2035. Based on these reductions, the passenger vehicle target in CARB's Scoping Plan (for AB 32) would be met (CARB 2010).

2017 Update to the SB 375 Targets

CARB is required to update the targets for the MPOs every eight years. In June 2017, CARB released a draft of the updated targets and technical methodology. It also recently released a final draft in October 2017. The updated targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update (for SB 32), while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. Like the 2010 targets, the updated SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks relative to 2005; this excludes reductions anticipated from implementation of state technology and fuels strategies, and any potential future state strategies such as statewide road user pricing. The proposed targets call for greater per capita GHG emission reductions from SB 375 than are currently in place, which for 2035, translate into proposed targets that either match or exceed the emission reduction levels in the MPOs' currently adopted Sustainable Community Strategies (SCSs, discussed below) to achieve the SB 375 targets. As proposed, CARB staff's proposed targets would result in an additional reduction of over 10 MMTCO_{2e} in 2035 compared to the current targets. For the next round of SCS updates, CARB's updated targets for the SCAG region are an 8 percent per capita GHG reduction in 2020 from 2005 levels (unchanged from the 2010 target) and a 19 percent per capita GHG reduction in 2035 from 2005 levels (compared to the 2010 target of 13 percent) (CARB 2018). CARB anticipates adoption of the updated targets and methodology in 2018 and subsequent SCSs adopted afterwards would be subject to these new targets (CARB 2017c).

SCAG's 2016-2040 RTP/SCS

SB 375 requires the MPOs to prepare a sustainable communities strategy in their regional transportation plan. For the SCAG region, the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted on April 7, 2016, and is an update to the 2012 RTP/SCS (SCAG 2016). In general, the SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light duty trucks and thereby reduce GHG emissions from these sources.

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The 2016-2040 RTP/SCS projects that the SCAG region will meet or exceed the passenger per capita targets set in 2010 by CARB. It is projected that VMT per capita in the region for year 2040 would be reduced by 7.4 percent with implementation of the 2016-2040 RTP/SCS compared to a no-plan year 2040 scenario. Under the 2016-2040 RTP/SCS, SCAG anticipates lowering GHG emissions 8 percent below 2005 levels by 2020, 18 percent by 2035, and 21 percent by 2040. The 18 percent reduction by 2035 over 2005 levels represents a 2 percent increase in reduction compared to the 2012 RTP/SCS projection. Overall, the SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. Land use strategies to achieve the region's targets include planning for new growth around high quality transit areas and livable corridors, and creating neighborhood mobility areas to integrate land use and transportation and plan for more active lifestyles (SCAG 2016). However, the SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS; instead, it provides incentives to governments and developers for consistency.

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles (see also the discussion on the update to the Corporate Average Fuel Economy standards under *Federal Laws*, above). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases with requirements for greater numbers of ZE vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025 new automobiles will emit 34 percent less global warming gases and 75 percent less smog-forming emissions.

Executive Order S-01-07

On January 18, 2007, the state set a new LCFS for transportation fuels sold in the state. Executive Order S-01-07 sets a declining standard for GHG emissions measured in CO₂e gram per unit of fuel energy sold in California. The LCFS requires a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applies to refiners, blenders, producers, and importers of transportation fuels, and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the "fuel cycle" using the most economically feasible methods.

Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewables portfolio standard established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08, signed in November 2008,

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expanded the state's renewable energy standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production will decrease indirect GHG emissions from development projects, because electricity production from renewable sources is generally considered carbon neutral.

Senate Bill 350

Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Executive Order B-16-2012

On March 23, 2012, the state identified that CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies worked with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZE vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). The executive order also directed the number of ZE vehicles in California's state vehicle fleet to increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The executive order also establishes a target for the transportation sector of reducing GHG emissions 80 percent below 1990 levels.

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and non-residential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 and most recently revised in 2016 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 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. On June 10, 2015, the CEC adopted the 2016 Building Energy Efficiency Standards, which went into effect on January 1, 2017.

The 2016 Standards improve upon the previous 2013 Standards for new construction of and additions and alterations to residential and nonresidential buildings. Under the 2016 Standards, residential and nonresidential buildings are generally 28 and 5 percent more energy efficient than the 2013 Standards, respectively (CEC 2015a). Buildings that were constructed in accordance with the 2013 Building Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the previous 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features. Although the 2016 standards do not achieve zero net energy (ZNE), they get very close to the state's goal and take important steps toward changing residential building practices in California. The 2019 standards will take the final step to achieve ZNE for newly constructed residential buildings throughout California (CEC 2015b).

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California Building Code: CALGreen

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.⁴ The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011, and were last updated in 2016. The 2016 Standards became effective on January 1, 2017.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR §§ 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

Solid Waste Regulations

California's Integrated Waste Management Act of 1989 (AB 939, Public Resources Code §§ 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the act requires that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses.

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code §§ 42900 et seq.) requires areas to be set aside for collecting and loading recyclable materials in development projects. The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

Section 5.408 of the 2016 CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

In October of 2014 Governor Brown signed AB 1826 requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also required that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that

⁴ The green building standards became mandatory in the 2010 edition of the code.

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consist of five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

Water Efficiency Regulations

The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed “SBX7-7.” SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 requires urban water providers to adopt a water conservation target of 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also requires the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

5.3.1.3 EXISTING CONDITIONS

The Pleasant View/OVPP, Sun View ES, and the 11 modernization schools currently generate GHG emissions from natural gas used for heating, electricity usage, vehicle trips, water usage, wastewater generation, and solid waste generation associated with the students and staff, and area sources from landscaping equipment.

5.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

South Coast Air Quality Management District

SCAQMD has adopted a significance threshold of 10,000 MTCO_{2e} per year for permitted (stationary) sources of GHG emissions for which SCAQMD is the designated lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group). Based on the last Working Group meeting (Meeting No. 15) in September 2010, SCAQMD identified a tiered approach for

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evaluating GHG emissions for development projects where SCAQMD is not the lead agency (SCAQMD 2010).

- **Tier 1.** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.
- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (e.g., city or county), project-level and cumulative GHG emissions are less than significant.
- **Tier 3.** If GHG emissions are less than the screening-level threshold, project-level and cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. Project-related GHG emissions include on-road transportation, energy use, water use, wastewater generation, solid waste disposal, area sources, off-road emissions, and construction activities. The SCAQMD Working Group identified that because construction activities would result in a "one-time" net increase in GHG emissions, construction activities should be amortized into the operational phase GHG emissions inventory based on the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame, since this is a typical interval before a new building requires the first major renovation. SCAQMD identified a screening-level threshold of 3,000 MTCO_{2e} annually for all land use types or the following land-use-specific thresholds: 1,400 MTCO_{2e} for commercial projects, 3,500 MTCO_{2e} for residential projects, and 3,000 MTCO_{2e} for mixed-use projects. These bright-line thresholds are based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds. Therefore, projects that do not exceed the bright-line threshold would have a nominal, and therefore, less than cumulatively considerable impact on GHG emissions:

- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.

SCAQMD has identified an efficiency target for projects that exceed the bright-line threshold: a 2020 efficiency target of 4.8 MTCO_{2e} per year per service population (MTCO_{2e}/year/SP) for project-level analyses and 6.6 MTCO_{2e}/year/SP for plan-level projects (e.g., general plans). Service population is generally defined as the sum of residential and employment population of a project. The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.⁵ For projects with a buildout horizon post-2020, efficiency targets are based on the SB 32 GHG reduction target for year 2030 and the long-term target for year 2050 under Executive Order S-03-05.

⁵ SCAQMD took the 2020 statewide GHG reduction target for "land use only" GHG emissions sectors and divided it by the 2020 statewide employment for the land use sectors to derive a per capita GHG efficiency metric that coincides with the GHG reduction targets of AB 32 for year 2020.

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For the purpose of this Project, SCAQMD's project-level thresholds of 3,000 MTCO₂e. If projects exceed the bright line and per capita efficiency targets, GHG emissions would be considered potentially significant in the absence of mitigation measures.

5.3.3 Environmental Impacts

5.3.3.1 METHODOLOGY

This GHG emissions evaluation was prepared in accordance with the requirements of CEQA to determine if significant GHG impacts are likely in conjunction with the type and scale of development associated with the Proposed Project. GHG emissions modeling was completed for the Project using CalEEMod as recommended by the SCAQMD. Modeling datasheets are in Appendix C.

The operational-phase, Project-related emissions are based on the planned improvements and operations at Pleasant View/OVPP and Sun View ES. The modeling accounts for the annual vehicle trips generated by the relocated students from the other schools; energy usage of the new proposed classroom portables; area sources; water demand; and wastewater and solid waste generation associated with the relocated students. Construction emissions are based on information provided by the Ocean View School District (OVSD) for the Project and are primarily focused on the planned improvements at the Pleasant View/OVPP and Sun View campuses. Where specific information was not available, CalEEMod default values were utilized. Life cycle emissions are not included in this analysis because not enough information is available.⁶

- **Transportation.** The average daily trip (ADT) generation was compiled by PlaceWorks (see Appendix F) and evaluated the relocation of Circle View ES students to Pleasant View/OVPP and the relocation of the Mesa View MS students to Sun View ES. These schools are assumed have the maximum number of students based on 3-year enrollment data. The relocation of these students would generate 1,310 ADT and 1,730 ADT, respectively, and representing the worst-case day for each campus. Vehicles would travel an average of 7.0 miles based on the general location of the other schools in relation to Pleasant View/OVPP and Sun View ES. For further details of the assumption, refer to Appendix C of this EIR. On-road GHG emissions are based on year 2018 emission rates and provides a conservative estimate as it is anticipated that the relocation of the Circle View ES and Mesa View MS students would occur in a later year.
- **Energy Use.** It is assumed that the portable buildings would be built to meet the 2016 Building and Energy Efficiency Standards.

⁶ Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analysis was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the Proposed Project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials is also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

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- **Water/Wastewater.** Water demand and wastewater generation associated with the relocated Circle View and Mesa View students are based on CalEEMod default usage rates and emission factors. GHG emissions from this sector are attributed to the energy used for treatment and distribution of water and wastewater.
- **Solid Waste.** Solid waste generation associated with the relocated Circle View and Mesa View students is based on CalEEMod default usage rates and emission factors. GHG emissions are associated with the decomposition of solid waste.
- **Area Sources.** Area source emissions from use of landscaping equipment are based on CalEEMod default values and the square footage of the proposed new portables and surface parking lot areas.
- **Construction.** Construction of the interim housing improvements at Pleasant View/OVPP and Sun View ES would be concurrent. Stages 1 and 2 would generally occur during the 2018 and 2019 summer recess periods. The installed portables would be removed in the 2023/2024 school or later after the all students return to their home schools. The total combined construction duration for Phases 1, 3, and 12 would be approximately four to five months. Table 5.3-5, *Construction Activities, Phasing, and Equipment*, shows the assumed construction activities, stages, and equipment based on information provided and CalEEMod defaults.

Table 5.3-5 Construction Activities, Phasing, and Equipment

Activities ¹	Start/End Dates ¹	Equipment ^{1,2}
Stage 1 in Phase 1		
Pleasant View/OVPP and Sun View ES		
Asphalt Demolition	06/21/2018 – 06/25/2018	2 saw cutters; 2 front loaders; 6 dump trucks; 1 asphalt grinder; 1 water truck; 1 utility truck
Asphalt Demo Debris Haul	06/26/2018 – 06/27/2018	No additional equipment assumed.
Site Preparation	06/27/2018 – 07/02/2018	1 skip loader; 1 front loader; 3 dump trucks; 1 water truck; 1 utility truck
Site Preparation Soil Haul	07/03/2018 – 07/03/2018	No additional equipment assumed.
Rough Grading	07/04/2018 – 07/10/2018	1 scraper; 1 front loader; 1 skip loader; 1 blade; 1 sweeper; 1 water truck; 2 utility truck
Rough Grading Soil Haul	07/11/2018 – 07/11/2018	No additional equipment assumed.
Utility Trenching	07/12/2018 – 07/25/2018	2 excavators; 2 backhoes; 2 loaders; 4 dump trucks; 1 water truck; 2 utility trucks
Fine Grading	07/25/2018 – 07/27/2018	2 graders; 2 skip loaders; 1 dump truck; 1 water truck
Fine Grading Soil Haul	07/30/2018 – 07/30/2018	No additional equipment assumed.
Asphalt Paving	07/31/2018 – 08/07/2018	1 bitumen distributor; 2 skip loaders; 2 vibrators; 1 roller; 1 roller; 1 utility truck; 10 end dump trucks
Portables Installation	08/08/2018 – 08/31/2018	1 crane; 4 utility trucks; 10 tractor trailers
Finishing/Landscaping	09/03/2018 – 09/18/2018	1 skip loader; 1 skid steer loader; 1 water truck; 2 utility trucks

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Table 5.3-5 Construction Activities, Phasing, and Equipment

Activities ¹	Start/End Dates ¹	Equipment ^{1,2}
Stage 2 in Phase 3		
Pleasant View/OVPP		
Temporary Buildings Removal	06/20/2019 – 07/03/2019	1 crane; 6 tractor trailers; 4 utility trucks
Site Preparation	07/04/2019 – 07/11/2019	1 skip loader; 1 front loader; 1 dump truck; 1 utility truck; 1 water truck
Fine Grading	07/12/2019 – 07/18/2019	1 skip loader; 1 front loader; 1 dump truck; 1 utility truck; 1 water truck
Sun View ES		
Temporary Buildings Installation	6/20/2019 – 7/2/2019	1 crane; 4 utility trucks; 6 tractor trailers
End Phase (Phase 12)		
Pleasant View/OVPP and Sun View ES		
Temporary Buildings Removal	06/20/2024 – 07/02/2024	1 crane; 4 utility trucks; 10 tractor trailers

Notes: n/a = not applicable
¹ Based on information provided by OVSD.
² A water truck is assumed for the asphalt demolition, site preparation, and grading subphases.

5.3.3.2 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.3-1: Implementation of the Proposed Project would not generate a net increase in GHG emissions, either directly or indirectly, that would have a significant impact on the environment. [Threshold GHG-1]

Impact Analysis: Implementation of a development project could contribute to global climate change through direct emissions of GHGs from onsite area sources and vehicle trips generated by the project, and indirectly through offsite energy production required for onsite activities, water use, and waste disposal. Because no single project is large enough to result in a measurable increase in global concentrations of GHG emissions, global warming impacts of a project are considered on a cumulative basis.

The increases in GHG emissions that would result from Project implementation are shown in Table 5.3-6, *Operational Phase GHG Emissions*. Annual GHG emissions were calculated for construction and operation of the Proposed Project. Operational phase emissions shown in the table are the combined emissions from operation of the proposed new improvements at Pleasant View/OVPP and Sun View ES and from the vehicle trips, water demand, wastewater generation, and solid waste generation associated with the relocation of the Circle View and Mesa View students to these two schools, respectively. The relocated students from Circle View ES and Mesa View MS would represent the highest number of students that would be relocated to Pleasant View/OVPP and Sun View ES, respectively.

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Construction emissions associated with the implementation of the proposed improvements at Pleasant View/OVPP and Sun View ES were amortized into the operational phase in accordance with SCAQMD’s proposed methodology (SCAQMD 2010). Additionally, for purposes of this analysis, the combined amortized construction emissions for Pleasant View/OVPP and Sun View ES are also assumed to represent the construction-related GHG emissions for the proposed modernizations at the other schools and the proposed improvements at Westmont ES and College View ES. Based on the proposed improvements, it is anticipated the construction activities needed to modernize the other schools would be less intensive than the activities required for the interim housing improvements at Pleasant View/OVPP and Sun View ES. Thus, utilizing the combined Pleasant View/OVPP and Sun View ES construction-related GHG emissions for the proposed improvements at the other schools provide a conservative estimate.

Table 5.3-6 Operational Phase GHG Emissions

Source	GHG Emissions	
	MTCO ₂ e Per Year ¹	Percent Change
Pleasant View/OVPP		
Area	<1	<1%
Energy ¹	67	7%
Mobile ²	824	84%
Solid Waste	64	7%
Water	21	2%
Pleasant View/OVPP – Construction-Amortized ³	3	<1%
Subtotal	978	100%
Sun View ES		
Area	<1	<1%
Energy ¹	65	5%
Mobile ⁴	1,088	87%
Solid Waste	75	6%
Water	24	2%
Sun View ES – Construction-Amortized ³	3	<1%
Subtotal	1,254	100%
Construction Emissions from the Other Schools		
Construction-Amortized ⁵	7	NA
Combined Emissions		
Area	<1	<1
Energy ¹	132	6%
Mobile ²	1,933	85%
Solid Waste	138	6%
Water	45	2%
Construction-Amortized	13	<1%
Total All Sectors	2,239	100%

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Table 5.3-6 Operational Phase GHG Emissions

Source	GHG Emissions	
	MTCO ₂ e Per Year ¹	Percent Change
Proposed SCAQMD Bright-Line Threshold	3,000 MTCO ₂ e	NA
Exceeds Threshold?	No	NA

Source: CalEEMod, Version 2016.3.2.

Notes: Totals may not equal 100 percent due to rounding.

¹ Assumes the new temporary buildings would meet the 2016 Building and Energy Efficiency Standards. Modeling also includes applicable water efficiency improvements required under CALGreen.

² Based on the total trips that would be generated from the temporary relocation of the 693 Circle View students to Pleasant View/OVPP.

³ Construction emissions are amortized over a 30-year Project lifetime per recommended SCAQMD methodology.

⁴ Based on the total trips that would be generated from the temporary relocation of the 812 Mesa View students to Sun View ES.

⁵ Assumes the combined Pleasant View/OVPP and Sun View amortized construction emissions.

As shown in the table, the primary source of GHG emissions is transportation sources from Project-related vehicle trips followed by emissions generated from energy usage and solid waste generation that are associated with the relocated students. Overall, the Proposed Project could generate 2,239 MTCO₂e of GHG emissions annually and would fall below SCAQMD bright-line screening threshold of 3,000 MTCO₂e per year. Additionally, this evaluated worst-case scenario would occur only over one academic school year while modernization improvements are implemented at the Mesa View and Circle View campuses. Therefore, GHG emissions generated by the Project are not considered to cumulatively contribute to statewide GHG emissions, and impacts would be less than significant.

Impact 5.3-2: Implementation of the Proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. [Threshold GHG-2]

Impact Analysis: Applicable plans adopted for the purpose of reducing GHG emissions include CARB’s Scoping Plan, and SCAG’s 2016-2040 RTP/SCS. A consistency analysis with these plans for the Proposed Project is presented below.

CARB Scoping Plan

The CARB Scoping Plan is applicable to state agencies, but is not directly applicable to cities/counties and individual projects (i.e., the Scoping Plan does not require the City to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that would affect a local jurisdiction’s emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the corporate average fuel economy standards (e.g., Pavley I and Pavley California Advanced Clean Cars program). Although measures in the Scoping Plan apply to state agencies and not the Proposed Project, the Project’s GHG emissions would be reduced by compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, the Proposed Project would not be inconsistent with the CARB Scoping Plan and impacts are considered less than significant.

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SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2016-2040 RTP/SCS was adopted April 7, 2016. SCAG's RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The overarching strategy in the 2016-2040 RTP/SCS is to plan for the southern California region to grow in more compact communities in existing urban areas; provide neighborhoods with efficient and plentiful public transit and abundant and safe opportunities to walk, bike, and pursue other forms of active transportation; and preserve more of the region's remaining natural lands (SCAG 2016). The 2016-2040 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as a forecast development that is generally consistent with regional-level general plan data. The projected regional development pattern, when integrated with the proposed regional transportation network identified in the 2016-2040 RTP/SCS, would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region. The 2016-2040 RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the 2016-2040 RTP/SCS, but provides incentives for consistency for governments and developers.

The Proposed Project would involve the modernization of 11 schools in the OVSD. It would also involve interim housing improvements—installation of portables and construction of additional surface parking lots—at Sun View ES and Pleasant View/OVPP to temporarily accommodate the displaced students as their home schools are modernized. Therefore, based on the nature of the Proposed Project, implementation of the Proposed Project would not interfere with SCAG's ability to implement the regional strategies outlined in the RTP/SCS.

5.3.4 Cumulative Impacts

Project-related GHG emissions are not confined to a particular air basin, but are dispersed worldwide. Therefore, impacts identified under Impact 5.3-1 are not project-specific impacts to global warming, but the Proposed Project's contribution to this cumulative impact. As discussed above, since the Project would not exceed SCAQMD's proposed per capita GHG threshold, the Project's GHG emissions and contribution to global climate change impacts are not considered cumulatively considerable.

5.3.5 Regulatory Requirements

State

- California Global Warming Solutions Act (AB 32)
- California Global Warming Solutions Act of 2006: Emissions Limit (SB 32)
- Sustainable Communities and Climate Protection Act (SB 375)
- Greenhouse Gas Emission Reduction Targets (Executive Order S-03-05)
- Clean Car Standards – Pavley (AB 1493)
- Renewables Portfolio Standards (SB 1078)

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- California Integrated Waste Management Act of 1989 (AB 939)
- California Mandatory Commercial Recycling Law (AB 341)
- California Advanced Clean Cars CARB (Title 13 CCR)
- Low-Emission Vehicle Program – LEV III (Title 13 CCR)
- Heavy-Duty Vehicle Greenhouse Gas Emissions Reduction Measure (Title 17 CCR)
- Low Carbon Fuel Standard (Title 17 CCR)
- California Water Conservation in Landscaping Act of 2006 (AB 1881)
- California Water Conservation Act of 2009 (SBX7-7)
- Statewide Retail Provider Emissions Performance Standards (SB 1368).
- Airborne Toxics Control Measure to Limit School Bus Idling and Idling at Schools (13 CCR 2480)
- Airborne Toxic Control Measure to Limit Diesel-Fuel Commercial Vehicle Idling (13 CCR 2485)
- In-Use Off-Road Diesel Idling Restriction (13 CCR 2449)
- Building Energy Efficiency Standards (Title 24, Part 6)
- California Green Building Code (Title 24, Part 11)
- Appliance Energy Efficiency Standards (Title 20)

5.3.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, the following impacts would be less than significant: 5.3-1 and 5.3-2.

5.3.7 Mitigation Measures

No mitigation measures are required.

5.3.8 Level of Significance After Mitigation

Greenhouse gas emission impacts would be less than significant.

5.3.9 References

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