



5.2 Greenhouse Gas Emissions



5.2 GREENHOUSE GAS EMISSIONS

This section evaluates greenhouse gas (GHG) emissions associated with the proposed Project and analyzes Project compliance with applicable regulations. Consideration of the Project's consistency with applicable plans, policies, and regulations, as well as the introduction of new sources of GHGs, is included in this section. GHG technical data is included as [Appendix C, Air Quality/Greenhouse Gas/HRA Data](#).

5.2.1 EXISTING SETTING

The Project site lies within the southern portion of the South Coast Air Basin (Basin). The Basin is a 6,600-square mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Geronio Pass area in Riverside County. The Basin's terrain and geographical location (i.e., a coastal plain with connecting broad valleys and low hills) determine its distinctive climate.

The general region lies in the semi-permanent high-pressure zone of the eastern Pacific. The climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of air pollution in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of pollutants throughout the Basin.

SCOPE OF ANALYSIS FOR CLIMATE CHANGE

The study area for climate change and the analysis of GHG emissions is broad as climate change is influenced by world-wide emissions and their global effects. However, the study area is also limited by the California Environmental Quality Act (CEQA) Guidelines [Section 15064(d)], which directs lead agencies to consider an "indirect physical change" only if that change is a reasonably foreseeable impact which may be caused by the project.

The baseline against which to compare potential impacts of a project includes the natural and anthropogenic drivers of global climate change, including world-wide GHG emissions from human activities that have grown more than 70 percent between 1970 and 2004. The State of California is leading the nation in managing GHG emissions. Accordingly, the impact analysis for this Project relies on guidelines, analyses, policy, and plans for reducing GHG emissions established by the California Air Resources Board (CARB).

GLOBAL CLIMATE CHANGE – GREENHOUSE GASES

The natural process through which heat is retained in the troposphere is called the "greenhouse effect."¹ The greenhouse effect traps heat in the troposphere through a three-fold process as follows: Short wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form

¹ The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface to 10 to 12 kilometers.



of long wave radiation; and GHG in the upper atmosphere absorb this long wave radiation and emit this long wave radiation into space and toward the Earth. This “trapping” of the long wave (thermal) radiation emitted back toward the Earth is the underlying process of the greenhouse effect.

The most abundant GHGs are water vapor and carbon dioxide (CO₂). Many other trace gases have greater ability to absorb and re-radiate long wave radiation; however, these gases are not as plentiful. For this reason, and to gauge the potency of GHGs, scientists have established a Global Warming Potential (GWP) for each GHG based on its ability to absorb and re-radiate long wave radiation.

GHGs normally associated with the proposed Project include the following:²

- Water Vapor (H₂O). Although water vapor has not received the scrutiny of other GHGs, it is the primary contributor to the greenhouse effect. Natural processes, such as evaporation from oceans and rivers, and transpiration from plants, contribute 90 percent and 10 percent of the water vapor in our atmosphere, respectively. The primary human related source of water vapor comes from fuel combustion in motor vehicles; however, it does not contribute a significant amount (less than one percent) to atmospheric concentrations of water vapor. The Intergovernmental Panel on Climate Change (IPCC) has not determined a GWP for water vapor.
- Carbon Dioxide (CO₂). Carbon dioxide is primarily generated by fossil fuel combustion in stationary and mobile sources. Due to the emergence of industrial facilities and mobile sources in the past 250 years, CO₂ emissions from fossil fuel combustion increased by a total of 5.6 percent between 1990 and 2015.³ Carbon dioxide is the most widely emitted GHG and is the reference gas (GWP of 1) for determining GWPs for other GHGs.
- Methane (CH₄). Methane is emitted from biogenic sources, incomplete combustion in forest fires, landfills, manure management, and leaks in natural gas pipelines. The United States’ top three methane sources are landfills, natural gas systems, and enteric fermentation. Methane is the primary component of natural gas, used for space and water heating, steam production, and power generation. The GWP of methane is 25.
- Nitrous Oxide (N₂O). Nitrous oxide is produced by both natural and human related sources. Primary human related sources include agricultural soil management, animal manure management, sewage treatment, mobile and stationary combustion of fossil fuels, adipic acid production, and nitric acid production. The GWP of nitrous oxide is 298.
- Hydrofluorocarbons (HFCs). HFCs are typically used as refrigerants for both stationary refrigeration and mobile air conditioning. The use of HFCs for cooling and foam blowing is increasing, as the continued phase out of Chlorofluorocarbons (CFCs) and HCFCs gains momentum. The 100-year GWP of HFCs range from 124 for HFC-152 to 14,800 for HFC-23.⁴

² All GWPs are given as 100-year GWP. Unless noted otherwise, all GWPs were obtained from the Intergovernmental Panel on Climate Change.

³ United States Environmental Protection Agency, *Inventory of United States Greenhouse Gas Emissions and Sinks 1990 to 2015*, April 2017, https://www.epa.gov/sites/production/files/2017-02/documents/2017_complete_report.pdf, accessed April 2, 2018.

⁴ Ibid.



- Perfluorocarbons (PFCs). PFCs are compounds consisting of carbon and fluorine and are primarily created as a byproduct of aluminum production and semiconductor manufacturing. Perfluorocarbons are potent GHGs with a GWP several thousand times that of CO₂, depending on the specific PFC. Another area of concern regarding PFCs is their long atmospheric lifetime (up to 50,000 years).⁵ The GWP of PFCs range from 7,390 to 12,200.⁶
- Sulfur hexafluoride (SF₆). SF₆ is a colorless, odorless, nontoxic, nonflammable gas. Sulfur hexafluoride is the most potent GHG that has been evaluated by the IPCC with a GWP of 22,800.⁷ However, its global warming contribution is not as high as the GWP would indicate due to its low mixing ratio compared to CO₂ (4 parts per trillion [ppt] in 1990 versus 365 parts per million [ppm], respectively).⁸

In addition to the six major GHGs discussed above (excluding water vapor), many other compounds have the potential to contribute to the greenhouse effect. Some of these substances were previously identified as stratospheric ozone (O₃) depletors; therefore, their gradual phase out is currently in effect. The following is a listing of these compounds:

- Hydrochlorofluorocarbons (HCFCs). HCFCs are solvents, similar in use and chemical composition to CFCs. The main uses of HCFCs are for refrigerant products and air conditioning systems. As part of the Montreal Protocol, all developed countries that adhere to the Montreal Protocol are subject to a consumption cap and gradual phase out of HCFCs. The United States is scheduled to achieve a 100 percent reduction to the cap by 2030. The 100-year GWPs of HCFCs range from 90 for HCFC-123 to 1,800 for HCFC-142b.⁹
- 1,1,1 trichloroethane. 1,1,1 trichloroethane or methyl chloroform is a solvent and degreasing agent commonly used by manufacturers. The GWP of methyl chloroform is 146 times that of CO₂.¹⁰
- Chlorofluorocarbons (CFCs). CFCs are used as refrigerants, cleaning solvents, and aerosols spray propellants. CFCs were also part of the U.S. Environmental Protection Agency's (EPA) Final Rule (57 Federal Register [FR] 3374) for the phase out of O₃ depleting substances. Currently, CFCs have been replaced by HFCs in cooling systems and a variety of alternatives for cleaning solvents. Nevertheless, CFCs remain suspended in the atmosphere contributing to the greenhouse effect. CFCs are potent GHGs with 100-year GWPs ranging from 3,800 for CFC 11 to 14,400 for CFC 13.¹¹

⁵ United States Environmental Protection Agency, *Overview of Greenhouse Gas Emissions*, <https://www.epa.gov/ghgemissions/overview-greenhouse-gases>, accessed April 2, 2018.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid.

⁹ Intergovernmental Panel on Climate Change, *Climate Change 2007: Working Group I: The Physical Science Basis, 2.10.2, Direct Global Warming Potentials*, 2007, https://www.ipcc.ch/publications_and_data/ar4/wg1/en/ch2s2-10-2.html, accessed April 2, 2018.

¹⁰ Ibid.

¹¹ Ibid.



5.2.2 REGULATORY SETTING

FEDERAL

To date, no national standards have been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the Federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

Energy Independence and Security Act of 2007. The Energy Independence and Security Act of 2007 (December 2007), among other key measures, requires the following, which would aid in the reduction of national GHG emissions:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Set a target of 35 miles per gallon for the combined fleet of cars and light trucks by model year 2020 and direct the National Highway Traffic Safety Administration (NHTSA) to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products and procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

U.S. Environmental Protection Agency Endangerment Finding. The EPA authority to regulate GHG emissions stems from the U.S. Supreme Court decision in *Massachusetts v. EPA* (2007). The Supreme Court ruled that GHGs meet the definition of air pollutants under the existing Clean Air Act and must be regulated if these gases could be reasonably anticipated to endanger public health or welfare. Responding to the Court's ruling, the EPA finalized an endangerment finding in December 2009. Based on scientific evidence it found that six GHGs (carbon dioxide [CO₂], methane [CH₄], nitrous oxide [N₂O], hydrofluorocarbons [HFCs], perfluorocarbons [PFCs], and sulfur hexafluoride [SF₆]) constitute a threat to public health and welfare. Thus, it is the Supreme Court's interpretation of the existing Act and the EPA's assessment of the scientific evidence that form the basis for the EPA's regulatory actions.

Federal Vehicle Standards. In response to the U.S. Supreme Court ruling discussed above, the George W. Bush Administration issued Executive Order 13432 in 2007 directing the EPA, the Department of Transportation, and the Department of Energy to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the NHTSA issued a final rule regulating fuel efficiency and GHG emissions from cars and light-duty trucks for model year 2011, and in 2010, the EPA and NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Barack Obama issued a memorandum directing the Department of Transportation, Department of Energy, EPA, and NHTSA to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the EPA



and NHTSA proposed stringent, coordinated Federal GHG and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards projected to achieve 163 grams per mile of CO₂ in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon if this level 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. On January 12, 2017, the EPA finalized its decision to maintain the current GHG emissions standards for model years 2022–2025 cars and light trucks.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011, the EPA 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 EPA, this regulatory program will reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.

In August 2016, the EPA and NHTSA announced the adoption of the phase two program related to the fuel economy and GHG standards for medium- and heavy-duty trucks. The phase two program will apply to vehicles with model year 2018 through 2027 for certain trailers, and model years 2021 through 2027 for semi-trucks, large pickup trucks, vans, and all types and sizes of buses and work trucks. The final standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons and reduce oil consumption by up to 2 billion barrels over the lifetime of the vehicles sold under the program.

Clean Power Plan and New Source Performance Standards for Electric Generating Units. On October 23, 2015, the EPA published a final rule (effective December 22, 2015) establishing the carbon pollution emission guidelines for existing stationary sources: electric utility generating units (80 FR 64510–64660), also known as the Clean Power Plan. These guidelines prescribe how states must develop plans to reduce GHG emissions from existing fossil-fuel-fired electric generating units. The guidelines establish CO₂ emission performance rates representing the best system of emission reduction for two subcategories of existing fossil-fuel-fired electric generating units: (1) fossil-fuel-fired electric utility steam-generating units and (2) stationary combustion turbines. Concurrently, the EPA published a final rule (effective October 23, 2015) establishing standards of performance for GHG emissions from new, modified, and reconstructed stationary sources: electric utility generating units (80 FR 64661–65120). The rule prescribes CO₂ emission standards for newly constructed, modified, and reconstructed affected fossil-fuel-fired electric utility generating units. The U.S. Supreme Court stayed implementation of the Clean Power Plan pending resolution of several lawsuits. Additionally, in March 2017, President Trump directed the EPA Administrator to review the Clean Power Plan in order to determine whether it is consistent with current executive policies concerning GHG emissions, climate change, and energy.

Presidential Executive Order 13783. Presidential Executive Order 13783, Promoting Energy Independence and Economic Growth (March 28, 2017), orders all Federal agencies to apply cost-benefit analyses to regulations of GHG emissions and evaluations of the social cost of carbon, nitrous oxide, and methane.

STATE

Various Statewide and local initiatives to reduce the State’s contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Every nation emits GHGs and as a



result makes an incremental cumulative contribution to global climate change; therefore, global cooperation will be required to reduce the rate of GHG emissions enough to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

Executive Order S-1-07. Executive Order S-1-07 proclaims that the transportation sector is the main source of GHG emissions in California, generating more than 40 percent of Statewide emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in California by at least ten percent by 2020. This order also directs CARB to determine whether this Low Carbon Fuel Standard could be adopted as a discrete early-action measure as part of the effort to meet the mandates in AB 32.

Executive Order S-3-05. Executive Order S-3-05 set forth a series of target dates by which Statewide emissions of GHGs would be progressively reduced, as follows:

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

The Executive Order directed the secretary of the California Environmental Protection Agency (Cal/EPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The secretary will also submit biannual reports to the governor and California Legislature describing the progress made toward the emissions targets, the impacts of global climate change on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the executive order, the secretary of Cal/EPA created the California Climate Action Team, made up of members from various State agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of California businesses, local governments, and communities and through State incentive and regulatory programs.

Executive Order S-13-08. Executive Order S-13-08 seeks to enhance the State's management of climate impacts including sea level rise, increased temperatures, shifting precipitation, and extreme weather events by facilitating the development of State's first climate adaptation strategy. This will result in consistent guidance from experts on how to address climate change impacts in the State of California.

Executive Order S-14-08. Executive Order S-14-08 expands the State's Renewable Energy Standard to 33 percent renewable power by 2020. Additionally, Executive Order S-21-09 (signed on September 15, 2009) directs CARB to adopt regulations requiring 33 percent of electricity sold in the State come from renewable energy by 2020. CARB adopted the "Renewable Electricity Standard" on September 23, 2010, which requires 33 percent renewable energy by 2020 for most publicly owned electricity retailers.

Executive Order S-20-04. Executive Order S-20-04, the California Green Building Initiative, (signed into law on December 14, 2004), establishes a goal of reducing energy use in State-owned buildings by 20 percent from a 2003 baseline by 2015. It also encourages the private commercial sector to set the same goal. The initiative places the California Energy Commission (CEC) in charge of developing a building efficiency benchmarking system, commissioning and retro-commissioning (commissioning for existing commercial buildings) guidelines and developing and refining building energy efficiency standards under Title 24 to meet this goal.



Title 24, Part 6. California’s Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations 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. The CEC adopted the 2016 Title 24 standards, which became effective on January 1, 2017, and are applicable to the Project.¹² The 2016 standards continue to improve upon the 2013 Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings.¹³ Compliance with Title 24 is enforced through the building permit process.

Title 24, Part 11. The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. Most mandatory measure changes in the 2016 CALGreen Code from the previous 2013 CALGreen Code were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to energy that were added or revised affect electric vehicles chargers and charging and hot water recirculation systems. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional electric vehicle charging space requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification.¹⁴ For nonresidential mandatory measures, the number of required EV charging spaces has been revised in its entirety.¹⁵ Compliance with Title 24 is enforced through the building permit process.

Executive Order S-21-09. Executive Order S-21-09, 33 percent Renewable Energy for California, directs CARB to adopt regulations to increase California’s Renewable Portfolio Standard (RPS) to 33 percent by 2020. This builds upon SB 1078 (2002) which established the California RPS program, requiring 20 percent renewable energy by 2017, and SB 107 (2006) which advanced the 20 percent deadline to 2010, a goal which was expanded to 33 percent by 2020 in the 2005 Energy Action Plan II.

Assembly Bill 32 (California Global Warming Solutions Act of 2006). California passed the California Global Warming Solutions Act of 2006 (AB 32; *California Health and Safety Code* Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on Statewide GHG emissions. AB 32 requires that Statewide GHG emissions be reduced to 1990 levels by 2020. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

Assembly Bill 1493. AB 1493 (also known as the Pavley Bill) requires that CARB develop and adopt, by January 1, 2005, regulations that achieve “the maximum feasible reduction of GHG emitted by passenger vehicles and light-duty trucks and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State.”

¹² California Energy Commission, *2016 Building Energy Efficiency Standards*, www.energy.ca.gov/title24/2016standards/, accessed April 10, 2018.

¹³ Ibid.

¹⁴ California Building Standards Commission, *2016 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, Chapter 4—Residential Mandatory Measures*, effective January 1, 2017.

¹⁵ Ibid.



To meet the requirements of AB 1493, CARB approved amendments to the California Code of Regulations (CCR) in 2004 by adding GHG emissions standards to California's existing standards for motor vehicle emissions. Amendments to CCR Title 13, Sections 1900 and 1961 and adoption of 13 CCR Section 1961.1 require automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty weight classes for passenger vehicles (i.e., any medium-duty vehicle with a gross vehicle weight rating less than 10,000 pounds that is designed primarily to transport people), beginning with the 2009 model year. Emissions limits are reduced further in each model year through 2016. When fully phased in, the near-term standards will result in a reduction of about 22 percent in GHG emissions compared to the emissions from the 2002 fleet, while the mid-term standards will result in a reduction of about 30 percent.

Assembly Bill 3018. AB 3018 established the Green Collar Jobs Council) under the California Workforce Investment Board. The Green Collar Jobs Council will develop a comprehensive approach to address California's emerging workforce needs associated with the emerging green economy.

Senate Bill 97. On June 19, 2008, the Office of Planning and research (OPR) released a technical advisory on addressing climate change. This guidance document outlines suggested components to CEQA disclosure, including quantification of GHG emissions from a project's construction and operation; determination of significance of the project's impact to climate change; and if the project is found to be significant, the identification of suitable alternatives and mitigation measures.

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.¹⁶ 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 GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Furthermore, 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

¹⁶ See 14 California Code of Regulations Section 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHGs).



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.¹⁷

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.”¹⁸

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 to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document required by CEQA, which has not been finalized.

Senate Bill 375. SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in that MPOs regional transportation plan. CARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO’s SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects may not be eligible for funding programmed after January 1, 2012.

Senate Bills 1078 and 107. SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010.

Senate Bill 1368. SB 1368 (Chapter 598, Statutes of 2006) is the companion bill of AB 32 and was signed into law in September 2006. SB 1368 required the California Public Utilities Commission to establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007. SB 1368 also required the CEC to establish a similar standard for local publicly owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas fired plant. Furthermore, the legislation states that all electricity provided to California, including imported electricity, must be generated by plants that meet the standards set by California Public Utilities Commission and CEC.

Senate Bill 32 (SB 32). Signed into law on September 2016, SB 32 codifies the 2030 GHG reduction target in Executive Order B-30-15 (40 percent below 1990 levels by 2030). The bill authorizes CARB to adopt an interim GHG emissions level target to be achieved by 2030. CARB also must adopt rules and regulations in an open public process to achieve the maximum, technologically feasible, and cost-effective GHG reductions.

¹⁷ 14 California Code of Regulations Section 15064.4(b).

¹⁸ 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.



Carb Scoping Plan. On December 11, 2008, CARB adopted its Scoping Plan, which functions as a roadmap to achieve the California GHG reductions required by AB 32 through subsequently enacted regulations. CARB's Scoping Plan contains the main strategies California would implement to reduce the projected 2020 "Business as Usual" (BAU) emissions to 1990 levels, as required by AB 32. These strategies are intended to reduce CO₂eq¹⁹ emissions by 174 million metric tons (MT). This reduction of 42 million MTCO₂eq, or almost ten percent from 2002 to 2004 average emissions, would be required despite the population and economic growth forecasted through 2020.

CARB's Scoping Plan calculates 2020 BAU emissions as those expected to occur in the absence of any GHG reduction measures. The 2020 BAU emissions estimate was derived by projecting emissions from a past baseline year using growth factors specific to each of the different economic sectors (e.g., transportation, electrical power, commercial and residential, industrial, etc.). CARB used three-year average emissions, by sector, for 2002 to 2004 to forecast emissions to 2020. When CARB's Scoping Plan process was initiated, 2004 was the most recent year for which actual data was available. The measures described in CARB's Scoping Plan are intended to reduce the projected 2020 BAU to 1990 levels, as required by AB 32. On February 10, 2014, CARB released the draft proposed first update. On May 22, 2014, CARB approved the First Update to the AB 32 Scoping Plan. The update also defines CARB's climate change priorities for the next five years and sets the groundwork to each long-term goal set forth in Executive Orders S-3-05 and B-15-2012. Lastly, the update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the initial Scoping Plan and evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities in water, waste, natural resources, clean energy, transportation, and land use.

On January 20, 2017, CARB released the proposed Second Update to the Scoping Plan, which identifies the State's post-2020 reduction strategy. The Second Update was approved on December 14, 2017, and reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32.²⁰ Key programs that the Second Update builds upon include the Cap-and-Trade Regulation, the Low Carbon Fuel Standard, and much cleaner cars, trucks and freight movement, utilizing cleaner, renewable energy, and strategies to reduce methane emissions from agricultural and other wastes. The 2017 Scoping Plan establishes a new emissions limit of 260 million MTCO₂eq for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.

California's climate strategy will require contributions from all sectors of the economy, including the land base, and will include enhanced focus on zero- and near-zero-emission vehicle technologies; continued investment in renewables, including solar roofs, wind, and other 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. In addition to Statewide strategies, the 2017 Scoping Plan also identifies local governments as essential partners in achieving the State's long-term GHG reduction goals and identifies local actions to reduce GHG emissions. CARB recommends that local governments achieve a community-wide goal to achieve emissions of no more than 6 MTCO₂eq or less per capita by 2030 and 2 MTCO₂eq or less per capita by 2050. For CEQA projects, CARB states that lead agencies may

¹⁹ Carbon Dioxide Equivalent (CO₂eq) - A metric measure used to compare the emissions from various greenhouse gases based upon their GWP.

²⁰ California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, November 2017, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed April 2, 2018.



develop evidenced-based bright-line numeric thresholds - consistent with the Scoping Plan and the State's long-term GHG goals - and projects with emissions over that amount may be required to incorporate on-site design features and mitigation measures that avoid or minimize project emissions to the degree feasible; or, a performance-based metric using a climate action plan or other plan to reduce GHG emissions is appropriate.

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 used a BAU approach to determine whether the project would impede the state's compliance with statutory emissions reduction mandate established by the AB 32 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."²¹

The California Supreme Court suggested regulatory consistency as a 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 due to the extent that a project's design features comply with or exceed the regulations outlined in the 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" (bright line threshold approach) if supported by substantial evidence.

REGIONAL

South Coast Air Quality Management District

The Southern California 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;

²¹ Center for Biological Diversity v. California Department of Fish and Wildlife (Case No. 217763), page 20.



- 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.²² 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 MTCO₂eq per year. Under this proposal, commercial/residential projects that emit fewer than 3,000 MTCO₂eq per year would be assumed to have a less than significant impact on climate change. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MTCO₂eq per year for stationary source/industrial projects where the SCAQMD is the lead agency. However, the SCAQMD has yet to adopt a GHG significance threshold for land use development projects (e.g., residential/commercial projects); therefore, the commercial/residential thresholds were not formally adopted.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) adopted the *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016–2040 RTP/SCS)* on April 7, 2016. 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;²³
- 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

²² South Coast Air Quality Management District, *Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, October 2008.

²³ 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.



region. In particular, the 2016–2040 RTP/SCS 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 the SCAG region is home to about 18.3 million people in 2012 and currently includes approximately 5.9 million homes and 7.4 million jobs.²⁴ 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. High Quality Transit Areas²⁵ (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 2016–2040 RTP/SCS is expected to reduce per capita transportation emissions by 8 percent by 2020 and 18 percent by 2035. This level of reduction would meet the region’s GHG targets set by CARB of 8 percent per capita by 2020 and exceed the region’s GHG target set by CARB of 13 percent per capita by 2035.²⁶ 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 2040.²⁷ 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.

LOCAL

Burbank2035 General Plan

Burbank2035 includes numerous goals, policies, and programs that would impact future air emissions generated by land uses within the City. These include Mobility Programs M-6 (Transit System), M-7 (Bicycle Master Plan and Pedestrian Master Plan), and M-10 (Transportation Demand Management). Burbank2035 also includes an Air Quality and Climate Change Element, which is an optional element (i.e., not required by State law), pursuant to California Government Code Section 65303. This Element is specifically designed to reduce the City’s air pollutant and GHG emissions and comply with Statewide GHG

²⁴ 2016-2040 RTP/SCS population growth forecast methodology includes data for years 2012, 2020, 2035 and 2040.

²⁵ 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.

²⁶ Southern California Association of Governments, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, Executive Summary, p. 8, April 2016.

²⁷ Southern California Association of Governments, *Final Program Environmental Impact Report for 2016–2040, RTP/SCS*, Figure 3.8.4-1, April 2016.



emission reduction goals. The Air Quality and Climate Change Element of Burbank2035, contains the following Policies to that reduce potential air quality impacts:

Policy 1.1: Coordinate air quality planning efforts with local, regional, state, and federal agencies, and evaluate the air quality effects of proposed plans and development projects.

Policy 1.2: Seek to attain or exceed the more stringent of federal or state ambient air quality standards for each criteria air pollutant.

Policy 1.5: Require projects that generate potentially significant levels of air pollutants, such as landfill operations or large construction projects, to incorporate best available air quality and greenhouse gas mitigation in project design.

Policy 1.6: Require measures to control air pollutant emissions at construction sites and during soil disturbing or dust-generating activities (i.e., tilling, landscaping) for projects requiring such activities.

Policy 1.7: Require reduced idling, trip reduction, and efficiency routing of transportation for City departments, where appropriate.

Policy 1.9: Encourage the use of zero-emission vehicles, low-emission vehicles, bicycles, and other non-motorized vehicles, and car-sharing programs by requiring sufficient and convenient infrastructure and parking facilities in residential developments and employment centers to accommodate these vehicles.

Policy 1.10: Give preference to qualified contractors using reduced-emission equipment for City construction projects and contracts for services, as well as businesses that practice sustainable operations.

Policy 2.2: Separate sensitive uses such as residences, schools, parks, and day care facilities from sources of air pollution and toxic chemicals. Provide proper site planning and design features to buffer and protect when physical separation of these uses is not feasible.

Policy 2.3: Require businesses that cause air pollution to provide pollution control measures.

Policy 2.5: Require the use of recommendations from the California Air Resources Board's Air Quality and Land Use Handbook to guide decisions regarding location of sensitive land uses.

Policy 3.1: Develop and adopt a binding, enforceable reduction target and mitigation measures and actions to reduce community-wide greenhouse gas emissions within Burbank by at least 15 percent from current levels by 2020.

Burbank2035 Greenhouse Gas Reduction Plan

To meet the intent of AB 32 and Executive Order S-03-05, the City of Burbank has adopted the *Burbank2035 Greenhouse Gas Reduction Plan* (GGRP) to implement Burbank2035 policies on greenhouse gas emissions.²⁸ The GGRP provides an inventory of current GHG emissions in Burbank, emission

²⁸ City of Burbank, *Burbank2035, Greenhouse Gas Reduction Plan*, adopted February 19, 2013.



reduction measures, and Actions that implement the goals, policies, and implementation actions of the Air Quality and Climate Change Element of Burbank2035. The City's GGRP was adopted along with Burbank2035 address GHG emissions at a programmatic level. This approach is consistent with State CEQA Guidelines Section 15183.4, to determine the significance of residential and commercial projects. The process for establishing this programmatic approach included:

- Completing a baseline emissions inventory and projected future emissions;
- Identifying a communitywide reduction target;
- Preparing a plan to identify strategies and measures to meet the reduction target;
- Identifying targets and reduction strategies in the General Plan and evaluating the environmental impacts of the emissions reduction plan in the General Plan EIR;
- Monitoring effectiveness of reduction measures and adapting the plan to changing conditions; and
- Adopting the emissions reduction plan in a public process following environmental review.

The GGRP discusses that environmental review documents on individual development projects may tier from and/or incorporate by reference that existing programmatic review in their cumulative impacts analysis. Environmental review documents prepared for projects consistent with Burbank2035 and the GGRP may rely on the programmatic analysis of GHGs contained in the EIR certified for Burbank2035 and the GGRP by identifying specific GGRP measures applicable to the proposed Project, and how the proposed Project incorporates the measures. If the measures are not otherwise binding and enforceable, they must be incorporated as mitigation measures applicable to the proposed Project.

City of Burbank Energy Efficiency Standards

In November 2010, the City of Burbank adopted the 2010 Edition of the California Green Building Standards Code (CALGreen Code, California Code of Regulations, Title 24, Part 11) as the Green Building Code of the City. The Green Building Code is set forth in Burbank's Municipal Code (BMC) Title 9, Chapter 1, Article 10. The Green Building Code mandates new requirements for planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, environmental quality, and installer and special inspector qualifications.

5.2.3 IMPACT THRESHOLDS AND SIGNIFICANCE CRITERIA

CEQA SIGNIFICANCE CRITERIA

Appendix G of the CEQA Guidelines as amended contain analysis guidelines related to the assessment of GHG emissions. A project would result in a significant impact if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (refer to Impact Statement GHG-1); and/or



- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (refer to Impact Statement GHG-2).

Based on these significance thresholds and criteria, the Project's effects have been categorized as either "no impact," a "less than significant impact," or a "potentially significant impact." Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant unavoidable impact.

EFFICIENCY TARGET COMPARISON

A method of analyzing the efficacy of GHG emission reductions, and thereby providing further support for the Project's consistency with the applicable GHG reduction plans and policies, is to compare the Project's emissions to a GHG "efficiency target". A methodology based on an efficiency target analyzes a project's GHG emissions on a per "service population" basis to determine if the project achieves the identified level of GHG efficiency. This methodology recognizes that new growth can occur in a manner consistent with climate goals provided the incremental growth is appropriately efficient from a GHG emissions standpoint.²⁹ The service population for a project is based on the number of residents and employees generated by the project. The service population approach has been recognized by multiple air districts, including the Bay Area Air Quality Management District and San Luis Obispo County Air Pollution Control District, both of which have adopted efficiency-based GHG thresholds for 2020,³⁰ and the SCAQMD, which prepared a draft efficiency target for 2020.³¹

CARB established a statewide target of six metric tons CO₂e per capita by 2030 and two metric tons CO₂e per capita by 2050 in *California's 2017 Climate Change Scoping Plan (2017 Scoping Plan Update)*.³² These targets represent emissions and reductions necessary to achieve the 2030 statewide target under SB 32 and the 2050 target under S-3-05. The CARB per capita targets account for all emissions state-wide which include different sectors such as transportation, industrial, electricity generation, agriculture, commercial and residential uses.

The CARB recommends that local governments develop community-wide GHG emissions reduction goals necessary to reach 2030 and 2050 climate goals. Reduction goals are recommended to be expressed in mass emissions, per capita emissions, and service population emissions such as the six metric ton CO₂e per capita by 2030 and two metric tons CO₂e per capita by 2050 as discussed above. Once adopted, the community-wide GHG reduction plan could serve as a performance metric for project level analyses. However, the City's GGRP uses a per capita efficiency metric could be used as an additional indicator of a project's consistency with SB 32 and S-3-05 targets. Applied here, the efficiency target for the Project (an office building) is initially based on the AB 32 GHG reduction target and GHG emissions inventory prepared

²⁹ See *Center for Biological Diversity v. California Department of Fish and Wildlife and Newhall Land and Farming*, 62 Cal. 4th 204, 220 (2015) ("For projects, like the present residential and commercial development, which are designed to accommodate long-term growth in California's population and economic activity, this fact gives rise to an argument that a certain amount of greenhouse gas emissions is as inevitable as population growth. Under this view, a significance criterion framed in terms of efficiency is superior to a simple numerical threshold because CEQA is not intended as a population control measure.").

³⁰ See Bay Area Air Quality Management District's *CEQA Air Quality Guidelines*, Section 2.2, 2017; San Luis Obispo County Air Pollution Control District, *Greenhouse Gas Thresholds and Supporting Evidence*, Section 2.2.3 Efficiency-Based Threshold for Land Use Projects, March 28, 2012.

³¹ South Coast Air Quality Management District, *Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group #15*, September 28, 2010.

³² California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, November 2017.



for CARB's Scoping Plan. As discussed above, the CARB per capita target established in the Scoping Plan is based on state-wide emissions which includes sectors that may not be applicable to the Project (i.e., agriculture, industrial).

To develop an efficiency metric for 2026 (Project Buildout Year) patterned on and consistent with the 2030 and 2050 metrics in the 2017 Scoping Plan Update, land use-related sectors in the 2017 Scoping Plan Update's GHG inventory were identified and separated for an inventory specific to land use projects and then divided by the estimated state population and employment figures consistent with the service population target used by various local air districts.^{33,34,35} Non-land use GHG emissions associated with industrial uses, agriculture and forestry, ships and commercial boats, aviation, and rail transport were excluded from the land use-related (i.e., residential and commercial) emissions inventory. In other words, sources that would not be included in the Project GHG emission estimates were not included in the development of the GHG efficiency threshold.

When determining reductions necessary to achieve 2030 GHG targets, the 2017 Scoping Plan Update takes into account existing measures or those required by statute which are identified as "known commitments". However, the 2017 Scoping Plan Update also concludes that even when accounting for "known commitments", statewide GHG emissions would not achieve the 2030 targets unless further action is taken to reduce GHGs. Consequently, the Scoping Plan also takes into account the Post-2020 Cap-and-Trade Program, pursuant to AB 398, to achieve additional reductions to ensure that the 2030 target is achieved. The Post-2020 Cap-and-Trade Program has not allocated necessary reductions to specific sectors that it covers. Sectors that are subject to the Post-2020 Cap-and-Trade Program such as industrial and power generation sectors are not associated with land use projects.

In calculating the efficiency target for land use-related sectors, it was assumed that GHG emissions reductions would be consistent with "known commitments" related to the land use sector such as energy efficiency and VMT reduction measures. However, as discussed previously, known commitments would not be sufficient to achieve the 2030 targets. Therefore, consistent with the 2017 Scoping Plan Update, it was assumed that additional reductions necessary to achieve the 2030 targets would be accomplished by the Post-2020 Cap-and-Trade Program which mainly target industrial and power generation sectors.

The efficiency target for a project's buildout year can be calculated using the methodology described above and extrapolating the emissions reductions needed to maintain consistency with AB 32 and SB 32. Specifically, for this Project, the 2026 (buildout year) efficiency target was estimated based on statewide emissions data provided in the 2017 Scoping Plan Update. Emissions for sectors related to land use projects (residential, commercial, transportation) were parsed out from the 2017 Scoping Plan Update emissions inventory and the resultant value was divided by the projected population and employment in 2026.

Accordingly, the statewide land use-related efficiency target for 2026 is calculated as 3.08 MTCO₂eq per service population per year. This target was estimated based on the CARB 2017 Scoping Plan Update GHG emissions data and targets for land use related sectors and dividing the resultant value by the projected

³³ Project design features are based on relevant year 2020 targets established by AB 32 and *California's 2017 Climate Change Scoping Plan*.

³⁴ California Air Resources Board, *California's 2017 Climate Change Scoping Plan*, Appendix D, PATHWAYS Output Tool, November 2017.

³⁵ California Employment Development Department, *Employment Projections*, www.labormarketinfo.edd.ca.gov/data/employment-projections.html, accessed April 9, 2018.



population and employment for the Project buildout year. This GHG efficiency metric allows for evaluation of the Project's consistency with state climate policy through the lens of relative GHG efficiency. Refer to [Appendix C](#) for details of this calculation.

5.2.4 IMPACTS AND MITIGATION MEASURES

GHG-1 GREENHOUSE GAS EMISSIONS GENERATED BY THE PROJECT COULD HAVE A SIGNIFICANT IMPACT ON GLOBAL CLIMATE CHANGE.

Impact Analysis:

PROJECT-RELATED SOURCES OF GREENHOUSE GAS EMISSIONS

The proposed Project would involve the demolition of the existing gravel/asphalt ramp and surface parking lot, and construction of a 160,447-gross square foot office building and associated subterranean parking (163 spaces). Project-related GHG emissions would include emissions from direct and indirect sources. The proposed Project would result in direct and indirect emissions of CO₂, N₂O, and CH₄, and would not result in other GHGs that would facilitate a meaningful analysis. Therefore, this analysis focuses on these three forms of GHG emissions. Direct Project-related GHG emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Operational GHG estimations are based on energy emissions from natural gas usage and automobile emissions. CalEEMod relies upon trip data within the Project's Traffic Study (refer to [Appendix E, Traffic Study](#)) and Project specific land use data to calculate emissions. [Table 5.2-1, Projected Annual Greenhouse Gas Emissions](#), presents the estimated CO₂, N₂O, and CH₄ emissions of the proposed Project. CalEEMod outputs are contained within [Appendix C](#).

Direct Project-Related Sources of Greenhouse Gases

Construction Emissions. Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years³⁶), then added to the operational emissions. As shown in [Table 5.2-1](#), the proposed Project would result in 37.03 metric tons carbon dioxide equivalent per year (MTCO₂eq/yr) (amortized over 30 years), which represents a total of 1,110.91 MTCO₂eq from construction activities (37.03 MTCO₂eq/yr x 30 years).

Area Source. Area source emissions were calculated using CalEEMod and Project-specific land use data. Project-related area sources include landscape maintenance equipment, such as lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project site. As noted in [Table 5.2-1](#), the proposed Project would result in 0.01 MTCO₂eq/yr of area source GHG emissions.

³⁶ The project life span is based on the standard 30-year assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008*).



Mobile Source. The CalEEMod model relies upon trip data within the Traffic Study and Project specific land use data to calculate mobile source emissions. Based on the Project-generated daily vehicle trips, the Project would result in approximately 1,109.49 MTCO₂eq/yr of mobile source-generated GHG emissions; refer to Table 5.2-1.

**Table 5.2-1
Projected Annual Greenhouse Gas Emissions**

Source	CO ₂	CH ₄		N ₂ O		Total Metric Tons of CO ₂ eq ²
	Metric Tons/year ¹	Metric Tons/year ¹	Metric Tons of CO ₂ eq	Metric Tons/year ¹	Metric Tons of CO ₂ eq	
Direct Emissions						
• Construction (amortized over 30 years) ³	36.88	0.01	0.15	0.00	0.00	37.03
• Area Source ⁴	0.01	0.00	0.00	0.00	0.00	0.01
• Mobile Source	1,108.23	0.05	1.26	0.00	0.00	1,109.49
<i>Total Direct Emissions</i> ²	1,145.12	0.06	1.41	0.00	0.00	1,146.53
Indirect Emissions						
• Energy	1,314.18	0.03	0.85	0.01	2.49	1,317.52
• Solid Waste	30.29	1.79	44.75	0.00	0.00	75.04
• Water Demand	290.21	0.94	23.42	0.02	7.00	320.63
<i>Total Indirect Emissions</i> ²	1,634.68	2.76	69.02	0.03	9.49	1,713.19
Total Project-Related Emissions ²	2,859.72 MTCO₂eq/year					
Total Service Population Emissions ^{5,6}	1.58 MTCO₂eq/year					
Efficiency Target for Project Buildout (2026) ⁷	3.08 MTCO₂eq per SP per year					
Project Exceed Efficiency Target?	No					
Notes:						
1. Emissions calculated using the CalEEMod computer model; refer to <u>Appendix C</u> .						
2. Totals may be slightly off due to rounding.						
3. As a condition of approval, the proposed Project would be required to adhere to standard SCAQMD regulations, such as implementing SCAQMD Rule 403 that would further reduce construction emissions. The reduction/credits for construction emission mitigations are based on mitigation included in the CalEEMod model and as typically required by the SCAQMD. Reduction credits are associated with activities involving: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces twice daily; cover stock piles with tarps; water all haul roads twice daily; and limit speeds on unpaved roads to 15 miles per hour.						
4. Mitigated area source emissions include application of SCAQMD Rule 445 (Wood-Burning Devices). Only natural gas hearths would be allowed on the Project site per SCAQMD rules and regulations.						
5. Service population emissions are based on a service population of 1,806 assuming one trip is made to and from the Project site by the anticipated total daily trips associated with number of residents and employees (903). The service population also conservatively assumes only a single occupant for each trip.						
6. The Project's total service population emissions were calculated by dividing the total proposed Project-related emissions (2,859.72 MTCO ₂ eq/yr) by the service population (1,806); therefore, 2,859.72/1,806= 1.58.						
7. The efficiency target calculations are provided in <u>Appendix C</u> .						
Refer to <u>Appendix C</u> for detailed model input/output data.						



Indirect Project-Related Sources of Greenhouse Gases

Energy Consumption. Energy consumption emissions were calculated using the CalEEMod model and Project-specific land use data. Electricity would be provided to the Project site via Burbank Water and Power (BWP). The Project would indirectly result in 1,317.52 MTCO₂eq/yr due to energy consumption; refer to [Table 5.2-1](#).

Solid Waste. Solid waste associated with operations of the proposed Project would result in 75.04 MTCO₂eq/yr; refer to [Table 5.2-1](#).

Water Demand. Emissions from indirect energy impacts due to water supply would result in 320.63 MTCO₂eq/yr; refer to [Table 5.2-1](#).

Efficiency Target Comparison

As shown in [Table 5.2-1](#), when comparing the Project GHG emissions with the calculated efficiency target for 2026, the Project would emit 1.58 MTCO₂eq/yr per service population. This is lower than the calculated efficiency target for 2026 (3.08 MTCO₂eq/yr per service population), further demonstrating the Project's consistency with applicable GHG reduction plans and policies and highlighting the efficiency of the Project's GHG reduction measures. Thus, impacts related to GHG emissions generated by the proposed Project would be less than significant.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

GHG-2 IMPLEMENTATION OF THE PROPOSED PROJECT COULD CONFLICT WITH AN APPLICABLE GREENHOUSE GAS REDUCTION PLAN, POLICY, OR REGULATION.

Impact Analysis: As described above, compliance with a GHG emissions reduction plan renders a less-than-significant impact. The following section describes the extent the Project complies with or exceeds the performance-based standards included in the regulations outlined in the Scoping Plan, the 2016-2040 RTP/SCS, and the GGRP. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

CLIMATE CHANGE SCOPING PLAN

The goal to reduce GHG emissions to 1990 levels by 2020 (Executive Order S-3-05) was codified by the State Legislature as the 2006 Global Warming Solutions Act (AB 32). In 2008, CARB approved a Scoping Plan as required by AB 32.³⁷ The Scoping Plan has a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The following discussion demonstrates how the pertinent reduction actions relate to and reduce Project-related GHG emissions.

³⁷ Climate Change Proposed Scoping Plan was approved by the California Air Resources Board on December 11, 2008.



As shown in [Table 5.2-1](#), the Project would result in approximately 2,859.72 MTCO₂eq/yr. The breakdown of emissions by source category shows approximately less than 1 percent from area sources; 46 percent from energy consumption; 39 percent from mobile sources; 3 percent from solid waste generation; 11 percent from water supply, treatment, and distribution; and 1 percent from construction activities. Provided in [Table 5.2-2](#), *Consistency with the Climate Change Scoping Plan* is an evaluation of applicable reduction actions/strategies by emissions source category to determine how the Project would be consistent with or exceed reduction actions/strategies outlined in the First Update to the Scoping Plan.³⁸

The 2017 Scoping Plan Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the First Update to the Scoping Plan (2013). Although a number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets. As such, impacts related to consistency with the Scoping Plan would be less than significant.

Table 5.2-2
Consistency with the Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Area (Less than 1 percent of project inventory)		
SCAQMD Rule 445 (Wood Burning Devices): Requires use of natural gas to power all cooking stoves and fireplaces.	SCAQMD	Consistent. The Project would prohibit hearths (woodstove and fireplaces) to be installed in the proposed office building.
Energy (46 percent of project inventory)		
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.	BWP	Consistent. BWP's commitment to achieve 33 percent renewables by 2020 would meet the requirement under the RPS program. BWP indicated that 33 percent of its electricity has come from renewable resources since 2016. As BWP would provide electricity service to the Project site, the Project would use electricity that is produced consistent with this performance-based standard. Electricity GHG emissions provided in Table 5.2-1 above assume that BWP will receive at least 33 percent of their electricity from renewable sources by the year 2020.
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. ²	State Energy Resources Conservation and Development Commission and BWP	Consistent. BWP would be required (re: 2015 BWP Integrated Resource Plan) to generate electricity that would increase renewable energy resources to 50 percent by 2030. As BWP 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 2026 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 5.2-1 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. 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 the 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. The Project would support this action/strategy because it includes compliance with specific requirements of the Burbank Green Building Code (consistency with this regulation is discussed below).

³⁸ 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 5.2-2 [continued]
Consistency with the Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<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>	<p>State, CEC, and BWP</p>	<p>Consistent. BWP meets the requirements of SB 1368. As BWP would provide electricity service to the Project site, the Project would use electricity that meets the requirements under SB 1368.</p>
<p>CCR, Title 20: The 2012 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.</p>	<p>State and CEC</p>	<p>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, Section 6.4, Energy Conservation, of this 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>	<p>State and CEC</p>	<p>Consistent. Consistent with regulatory requirements, the Project shall comply with applicable provisions of the Burbank Green Building Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 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 built to 2013 Title 24 standards. The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under BAU in CARB's Scoping Plan. The standards promote the use of better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Project has incorporated energy efficiency standards that are substantially more effective than the measures identified in the Scoping Plan to reduce GHG emissions.</p>
<p>Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the United States 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.</p>	<p>Federal/Manufacturers</p>	<p>Consistent. EISA would serve to reduce the use of incandescent light bulbs for the Project and, thus, reduce energy usage associated with lighting. Electricity GHG emissions provided in Table 5.2-1 account for a 25-percent reduction in lighting electricity consumption with implementation of this regulation.</p>
<p>Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state specified general purpose lights that contain levels of hazardous substances, as it 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 2018.⁴</p>	<p>State/Manufacturers</p>	<p>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.</p>
<p>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.</p>	<p>State, CARB</p>	<p>Consistent. As required by AB 32 and the 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 electricity usage per year presented in Table 5.2-1 would be covered by the Cap-and-Trade Program (as BWP would be a covered entity) and would be consistent with AB 32 and the Scoping Plan.</p>



Table 5.2-2 [continued]
Consistency with the Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Mobile (39 percent of project inventory)		
<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 emissions generated by the Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions provided in Table 5.2-1 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).^{5,6}</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 5.2-1 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 5.2-1, conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation.</p>
<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>	State, CARB Regional, SCAG	<p>Consistent. SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would include an office building within a HQTAs. Therefore, the Project would be consistent with SCAG’s 2016–2040 RTP/SCS as it is located within a HQTAs. Furthermore, the 2016–2040 RTP/SCS would result in an estimated 18-percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040. As the Project would comply with the 2016–2040 RTP/SCS, the Project would be consistent with SB 375. Consistency with the 2016–2040 RTP/SCS is discussed below in Table 5.2-3, Consistency with the 2016-2040 RTP/SCS.</p>
Solid Waste (Three percent of project inventory)		
<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</p>	State	<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 5.2-1 includes a 50-percent reduction in solid waste generation source emissions.</p>



Table 5.2-2 [continued]
Consistency with the Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.⁷</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.⁸</p>		<p>The Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341.</p>
Water (11 percent of project inventory)		
<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 has not yet defined design features related to energy efficiency. However, compliance with GGRP Measure E-1.1 is required as a Project Condition of Approval to ensure compliance with Title 24 and therefore a 20-percent overall water use reduction. Project-related GHG emissions from water related sources, provided in <u>Table 5.2-1</u> accounts for compliance with water efficiency requirements.</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 convene, 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 this performance based standard.</p>
Construction (One percent of project inventory)		
<p>CARB In-Use Off-Road Regulation: CARB's in-use off-road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.</p>	CARB	<p>Consistent. The Project would use construction contractors that would comply with this regulation.</p>
<p>CARB In-Use On-Road Regulation: CARB's in-use on-road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.</p>	CARB	<p>Consistent. The Project would use construction contractors that would comply with this regulation.</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.^a Required measures include:</p> <ul style="list-style-type: none"> • Increase RPS to 50 percent of retail sales by 2030. • Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. 	CPUC, CEC, CARB	<p>Consistent. BWP is required to generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As BWP would provide electricity service to the Project site, by 2030 the Project would use electricity consistent with the requirements of SB 350. It is assumed that BWP will receive at least 33 percent of electricity from renewable sources by year 2020 and 50 percent by the year 2030 (with a straight-line interpolation for the Project buildout year of 2026).</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</p>



Table 5.2-2 [continued]
Consistency with the Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in IRPs to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs.</p>		<p>below) and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.</p> <p>The Project would comply with this this action/strategy being located within the BWP service area and comply with CalGreen and Title 24 energy efficiency standards.</p>
<p>Implement Mobile Source Strategy (Cleaner Technology and Fuels)</p> <ul style="list-style-type: none"> • At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025. • At least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030. • Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Cars regulations. • Medium- and heavy-duty GHG Phase 2. • Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard. • Last Mile Delivery: New regulation that would result in the use of low NOX or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030. • Further reduce VMT through continued implementation of SB 375 and regional Sustainable Communities Strategies; forthcoming statewide implementation of SB 743; and potential additional VMT reduction strategies not specified in the Mobile Source Strategy but included in the document “Potential VMT Reduction Strategies for Discussion.” 	<p>CARB, CalSTA, SGC, Caltrans, CEC, OPR, Local agencies</p>	<p>Consistent. The CARB approved the Advanced Clean Cars Program in 2012 which establishes an emissions control program for model year 2017 through 2025. Standards under the Advanced Clean Cars Program likely will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Project, depending on the outcome of ongoing negotiations between CARB and EPA regarding federal standards. The Program also requires auto manufacturers to produce an increasing number of zero emission vehicles in the 2018 through 2025 model years. Extension of the Advanced Clean Cars Program has not yet been adopted, but it is expected that measures will be introduced to increase GHG stringency on light duty autos and continue adding zero emission and plug in vehicles through 2030.</p> <p>CARB is also developing the Innovative Clean Transit measure to encourage purchase of advanced technology buses such as alternative fueled or battery powered buses. This would allow fleets to phase in cleaner technology in the near future. CARB is also in the process of developing proposals for new approaches and strategies to achieve zero emission trucks under the Advanced Clean Local Trucks (Last Mile Delivery) Program.</p> <p>GHG emissions generated by Project-related vehicular travel 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 5.2-1 conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. Although the Innovative Clean Transit and Advanced Clean Local Truck Programs have not yet been established, the Project would also benefit from these measures once adopted.</p> <p>SB 375 requires SCAG to direct the development of the SCS for the region, which is discussed further below. The Project represents an infill development within an existing urbanized area that would include an office building within a HQT. Therefore, the Project would be consistent with SCAG's 2016–2040 RTP/SCS, as it is located within a HQT. Furthermore, the 2016–2040 RTP/SCS would result in an estimated 18 percent decrease in per capita GHG emissions from passenger vehicles by 2035 and 21-percent decrease in per capita GHG emissions from passenger vehicles by 2040. As the Project would comply with the 2016–2040 RTP/SCS, the Project would be consistent with SB 375. Consistency with the 2016–2040 RTP/SCS is discussed below in Table 5.2-3.</p>



Table 5.2-2 [continued]
Consistency with the Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Increase Stringency of SB 375 Sustainable Communities Strategy (2035 Targets)</p>	<p>CARB</p>	<p>Consistent. Under SB 375, the CARB sets regional targets for GHG emission reductions from passenger vehicle use. In 2010, the CARB established targets for 2020 and 2035 for each region. As required under SB 375, the CARB is required to update regional GHG emissions targets every 8 years, which is due to be updated in 2018. As part of the 2018 updates, the CARB has proposed a passenger vehicle related GHG reduction of 19 percent for 2035 for the SCAG region, which is more stringent than the current reduction target of 13 percent for 2035. The proposed targets will be considered for adoption in 2018.</p> <p>The Project would be consistent with SB375 for developing an office building within a HQTAs. Therefore, the Project would be consistent with SB 375 and the 2016–2040 RTP/SCS.</p>
<p>By 2019, adjust performance measures used to select and design transportation facilities.</p> <p>Harmonize project performance with emissions reductions, and increase competitiveness of transit and active transportation modes (e.g., via guideline documents, funding programs, project selection, etc.).</p>	<p>CalSTA and SGC, OPR, CARB, GoBiz, IBank, DOF, County Transportation Commission (CTC), Caltrans</p>	<p>Not Applicable. The Project would not involve construction of transportation facilities.</p>
<p>By 2019, develop pricing policies to support low-GHG transportation (e.g., low-emission vehicle zones for heavy duty, road user, parking pricing, transit discounts).</p>	<p>CalSTA, Caltrans, CTC, OPR/SGC, CARB</p>	<p>Consistent. The Project would provide at least 10 EV charging stations.</p>
<p>Implement California Sustainable Freight Action Plan:</p> <ul style="list-style-type: none"> • Improve freight system efficiency. <p>Deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.</p>	<p>CARB</p>	<p>Consistent. The Project land uses would not include freight transportation or warehousing. Therefore, the Project would not interfere or impede the implementation of the Sustainable Freight Action Plan.</p>
<p>Adopt a Low Carbon Fuel Standard with a CI reduction of 18 percent.</p>	<p>CARB</p>	<p>Consistent. This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with LCFS. Mobile source GHG emissions provided in Table 5.2-1 were calculated using CalEEMod which includes implementation of the LCFS into mobile source emission factors.</p> <p>The current LCFS, adopted in 2007, requires a reduction of at least 10 percent in the carbon intensity (CI) of California’s transportation fuels by 2020. The CARB has proposed an amendment to the LCFS regulation to target a 20 percent reduction in CI from a 2010 baseline by 2030. The amendments were released in March 2018 with the public comment period ending in April 2018. The proposed amendments would be potentially adopted in September 2018 with a Board hearing and vote.</p>



Table 5.2-2 [continued]
Consistency with the Climate Change Scoping Plan

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
<p>Implement the Short-Lived Climate Pollutant Strategy by 2030:</p> <ul style="list-style-type: none"> 40 percent reduction in methane and hydrofluorocarbon emissions below 2013 levels. <p>50 percent reduction in black carbon emissions below 2013 levels.</p>	<p>CARB, CalRecycle, CDFG, SWRCB, Local air districts</p>	<p>Consistent. Senate Bill 605 (SB 605) was adopted in 2014 which directs CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy. Senate Bill 1383 was later adopted in 2016 to require CARB to set statewide 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.</p> <p>The Project would comply with the CARB SLCP Reduction Strategy which limits the use of hydrofluorocarbons for refrigeration uses.</p>
<p>By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.</p>	<p>CARB, CalRecycle, CDFG, SWRCB, Local air districts</p>	<p>Consistent. Under SB 1383, the California Department of Resources Recycling and Recovery (CalRecycle) is responsible for achieving a 50 percent reduction in the level of statewide disposal of organic waste from the 2014 level by 2020 and 75-percent reduction by 2025. As of March 2018, CalRecycle is currently holding workshops to review draft regulatory language. Adoption of the regulations to achieve SB 1383 targets is expected in early 2019.</p> <p>The Project would be consistent with AB 341 which requires not less than 50 percent of solid waste generated be source reduced through recycling, composting or diversion. Compliance with AB 341 would also help achieve the goals of SB 1383.</p>
<p>Implement the post-2020 Cap-and-Trade Program with declining annual caps.</p>	<p>CARB</p>	<p>Consistent. The current Cap-and-Trade program would end on December 31, 2020. Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program from January 1st, 2021, through December 31st, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.</p>
<p>By 2018, develop Integrated Natural and Working Lands Implementation Plan to secure California's land base as a net carbon sink:</p> <ul style="list-style-type: none"> Protect land from conversion through conservation easements and other incentives. Increase the long-term resilience of carbon storage in the land base and enhance sequestration capacity Utilize wood and agricultural products to increase the amount of carbon stored in the natural and built environments <p>Establish scenario projections to serve as the foundation for the Implementation Plan</p>	<p>CNRA and departments within, CDFG, CalEPA, CARB</p>	<p>Consistent. This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.</p>
<p>Establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018</p>	<p>CARB</p>	<p>Consistent. This regulatory program applies to Natural and Working Lands, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Integrated Natural and Working Lands Implementation Plan.</p>
<p>Implement Forest Carbon Plan</p>	<p>CNRA, CAL FIRE, CalEPA and departments within</p>	<p>Consistent. This regulatory program applies to state and federal forest land, not directly related to development of the Project. However, the Project would not interfere or impede implementation of the Forest Carbon Plan.</p>



**Table 5.2-2 [continued]
Consistency with the Climate Change Scoping Plan**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Identify and expand funding and financing mechanisms to support GHG reductions across all sectors.	State Agencies & Local Agencies	Consistent. Funding and financing mechanisms are the responsibility of the state and local agencies. The Project would not conflict with funding and financing mechanisms to support GHG reductions.
Source: California Air Resources Board, California's 2017 Climate Change Scoping Plan, November 2017.		

2016-2040 RTP/SCS

The 2016–2040 RTP/SCS is expected to help California reach its GHG reduction goals, with reductions in per capita transportation emissions of 9 percent by 2020 and 16 percent by 2035.³⁹ Furthermore, although there are no per capita GHG emission reduction targets for passenger vehicles set by CARB for 2040, the 2016–2040 RTP/SCS GHG emission reduction trajectory shows that more aggressive GHG emission reductions are projected for 2040.⁴⁰ The 2016–2040 RTP/SCS would result in an estimated 8-percent decrease in per capita passenger vehicle GHG emissions by 2020, 18-percent decrease in per capita passenger vehicle GHG emissions by 2035, and 21-percent decrease in per capita passenger vehicle 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 passenger vehicle 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.

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;
- Jobs and housing closer to transit;
- New housing and job growth focused in High Quality Transit Areas (HQTA); and
- Biking and walking infrastructure to improve active transportation options, transit access.

The Project represents an infill development within an urbanized area slated for development and already supported by existing transportation systems. Further, the Project would be located within 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-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours. One commuter rail line and four bus lines currently serve the Project site. These transit lines consist of the Metrolink commuter rail, Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, and BurbankBus lines. Metro Line 94/794 provides service to the Project site with peak period headways of 15 minutes or less (refer to [Section 5.4, Transportation](#)).

³⁹ California Air Resources Board, *Regional Greenhouse Gas Emission Reduction Targets Pursuant to SB 375*, Resolution 10-31.

⁴⁰ Southern California Association of Governments, *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy*, p. 153, April 2016.



At the regional level, the 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 the 2016–2040 RTP/SCS, this section also analyzes the Project’s land use assumptions for consistency with those utilized by SCAG in its Sustainable Communities Strategy. 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 Regional Transportation Plan/Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. Table 5.2-3, Consistency with the 2016-2040 RTP/SCS, demonstrates the Project’s consistency with the Actions and Strategies set forth in the 2016–2040 RTP/SCS.⁴¹

In sum, the Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state’s long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state regulatory requirements. Therefore, the Project would be consistent with the GHG reduction-related actions and strategies contained in the 2016–2040 RTP/SCS.

**Table 5.2-3
Consistency with the 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Project 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. 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. 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 employment opportunities.
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 jurisdictions, and California Department of Housing and Community Development (HCD). The Project would not impair SCAG from collaborating with local jurisdictions and agencies to acquire regional fair share housing allocation.
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.

⁴¹ As discussed in the 2016–2040 RTP/SCS, the actions and strategies included in the 2016–2040 RTP/SCS remain unchanged from those adopted in the 2012–2035 RTP/SCS.



Table 5.2-3 [continued]
Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
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 areas not served by high-quality transit.	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 subregional council of governments (COGs). The Project area is well-served by high-quality transit and is designated as a HQT. The Project would not impair the City from adopting neighborhood-oriented development and 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. The Project would not impair the City’s or SCAG’s ability to encourage the use of alternatively-fueled vehicles through various policies and programs. Specifically, the Project would be required to comply with the California Green Building Standards Code Nonresidential Mandatory Measure 5.106.5.3, <i>Electric Vehicle (EV) Charging</i> . This measure requires the Project to incorporate 10 EV charging 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. While this action/strategy is not directly applicable, the Project, as noted above, would not impair any jurisdiction’s ability to encourage the use of alternatively-fueled vehicles and would incorporate 10 EV charging 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 promote healthy lifestyles through long-term bicycle parking spaces for employees and visitors. This would be required through the California Green Building Standards Code Nonresidential Mandatory Measure 5.106.4, <i>Bicycle Parking</i> . This measure requires the Project to provide secure bicycle parking for 5 percent of the tenant vehicular parking spaces. Furthermore, pedestrian walkways exist within the study area along North Avon Street, Empire Avenue, and Ontario Street. Within the campus, there are several internal sidewalks that provide access to the existing and proposed buildings. Thus, the Project would encourage and promote walkability in the Project site vicinity.
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. See discussion above.
Seek partnerships with state, regional, and local agencies to acquire funding sources for innovative planning projects.	Local Jurisdictions, SCAG, State	Not Applicable. While this action/strategy is not directly 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 2016–2040 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 Plan, as demonstrated above.
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	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 Plan, as demonstrated above.



Table 5.2-3 [continued]
Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
options and to contribute to the resiliency and vitality of neighborhoods and districts.		
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, recreation and culture, and a full-range of shopping, entertainment and services all within a relatively short distance.	Local Jurisdictions, SCAG	Consistent. The Project would develop an office building which would provide employment opportunities to the community.
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. While this action/strategy is not directly applicable, the Project would not impair the City's, or the CTC's ability to pursue joint development opportunities. However, the Project would accommodate regional growth projected by SCAG in the Burbank 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. While this action/strategy is not directly 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.
Consider developing healthy community or active design guidelines that promote physical activity and improved health.	Local Jurisdictions	Consistent. The Project, as discussed above, would encourage healthy lifestyles through the provision long-term bicycle parking spaces for employees and visitors. Furthermore, pedestrian walkways exist within the study area along North Avon Street, Empire Avenue, and Ontario Street. Within the campus, there are several internal sidewalks that provide access to the existing and proposed buildings. Thus, the Project would encourage and promote walkability in the Project site vicinity.
Support projects, programs, policies, and regulations to protect resources areas, such as natural habitats and farmland, from future development.	Local Jurisdictions, SCAG	Consistent. The Project would not impair the City's or SCAG's ability to support projects, programs, policies, and regulations to protect resources areas, such as natural habitats and farmland, from future development. Furthermore, the Project, which is an infill development located in an urbanized area in the City, is not located in an area that would impact such resource areas.
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, as discussed above, the Project would be consistent with the goals of SB 375.
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.
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.



Table 5.2-3 [continued]
Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
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 county transportation commissions (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. SCAG and CTCs are the responsible parties for developing regional mitigation policies or approaches for the 2016 RTP. SCAG adopted the 2016–2040 RTP/SCS on April 7, 2016.
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.
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	Consistent. While this action/strategy is not directly applicable, and 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 connecting to the existing transportation network and improving sidewalk access, with appropriate design considerations to ensure travel safety and reliability. Conditions of Approval will be included in the project to require the developer to assist in the cost of the maintenance of the Metro Link Station.
Expand the use of transit modes in our subregions such as Bus Rapid Transit (BRT), rail, limited-stop service, and point-to-point express services utilizing the HOV and HOT lane networks.	SCAG, CTCs, Local Jurisdictions	Not Applicable. While this action/strategy is not directly 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.
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 abilities 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.
Encourage regional and local transit providers to develop rail interface services at Metrolink, Amtrak, and high-speed rail stations.	SCAG, CTCs, Local Jurisdictions	Consistent. 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. Through Conditions of Approval, the Developer will be required to assist in the cost of maintaining the Metro Link Station.
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 City of Burbank’s requirements 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 space, where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.	SCAG, CTCs, Local Jurisdictions	Consistent. The Project is an infill development consisting of an office building in close proximity to neighborhoods, restaurants, and commercial uses.



Table 5.2-3 [continued]
Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
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, infill development and would provide a distribution of various uses throughout the Project site that would encourage residents to walk to commercial and restaurant uses. The Project site is also located in a HQTA as designated by the 2016–2040 RTP/SCS. The Project would also provide bicycle parking spaces and EV charging spaces for employees and visitors. Therefore, the Project would serve to reduce vehicle trips and thus VMT, thereby contributing to a reduction in air pollutant emissions.
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 would be located within walking distance of existing and proposed commercial and restaurant uses, thus reducing the number and length of vehicle trips. The Project site is also located in a HQTA as designated by the 2016–2040 RTP/SCS.
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	Consistent. The Project would not impair the ability of SCAG, the CTCs, or the City to provide such a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers. Moreover, as discussed above, the Project would be located within walking distance of existing and proposed commercial and restaurant uses, as well as local and regional transit.
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 would be located within walking distance of local and regional transit. The developer will be required through Conditions of Approval to provide 10 electrical vehicle charging station as a part of their project.
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. While this action/strategy is not directly applicable to the Project, the Project would not impair the local jurisdiction's ability to issue transit fare discounts and local vendor product and service discounts. Through Conditions of Approval, the developer will be required to provide TAP cards to comply with the City's TDM policy.
Work with transit properties and local jurisdictions to identify and remove barriers to maintaining on-time performance.	SCAG, CTCs, Local Jurisdictions	Not Applicable. While this action/strategy is not directly applicable to the Project, 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.
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.



**Table 5.2-3 [continued]
Consistency with the 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Continue to work with neighboring Metropolitan Planning Organizations 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	Consistent. 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. The developer will be required through Conditions of Approval to comply with the policies of the TDM and to contribute to the Golden State Circulator.
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 in seeking 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, 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 is located in 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.
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. The Project would not impair the SCAG’s, ability to enhance the transportation system.
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. While this action/strategy is not directly applicable to the Project, 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 (NEV) 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 design of the Project would enhance the walkability of the Project vicinity, as well as include long-term bicycle parking spaces and EV charging spaces.
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG, Local Jurisdictions	Consistent. As previously discussed, the Project would reduce GHG emissions by including long-term bicycle parking spaces and EV charging spaces.
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. Through Conditions of Approval, the developer will be required to maintain their membership in the TDM and TMO and to provide bicycle racks in accordance with the City requirements.



Table 5.2-3 [continued]
Consistency with the 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Project Consistency Analysis
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions, CTCs	Consistent. The Project would not impair the City's or CTCs ability to encourage the development of telecommuting programs by employers.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	State, 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.
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, State	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. Moreover, all sidewalks and internal driveways would be designed to conform to City requirements. In addition, the Project site is located in a HQTA as designated by the 2016 RTP/SCS.
Collaborate with local jurisdictions and subregional COGs to develop regional policies regarding transportation system management (TSM).	SCAG, COGs, Local Jurisdictions	Not Applicable. While this action/strategy is not directly applicable to the Project, 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 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. The Project would not impair efficient integration of transportation systems.
Provide training opportunities for local jurisdictions on TSM strategies, such as Intelligent Transportation Systems (ITS).	SCAG, Local Jurisdictions	Not Applicable. While this action/strategy is not directly applicable to the Project, 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. While this action/strategy is not directly applicable to the Project, the Project would not impair the ability of SCAG, the COGs, or the City to collaborate on updates to the ITS inventory.
Collaborate with CTCs to regularly update the county and regional ITS architecture.	SCAG, CTCs, Local Jurisdictions	Not Applicable. While this action/strategy is not directly applicable to the Project, the Project would not impair the ability of SCAG, the CTCs, or the City to collaborate on updates to the ITS architecture.
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.
Clean Vehicle Technology Actions and Strategies		
Develop a Regional Plug-in Electric Vehicle (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. This action/strategy is not directly applicable to the Project.
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.	SCAG, Local Jurisdictions	Not Applicable. While the acceleration of fleet conversion by the Project's future employees is market driven and beyond the direct control or influence of the Project, the Project would not impair the City's or SCAG's ability to support subregional strategies in furtherance of that conversion.
Source: Southern California Association of Governments, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, April 2016.		



Burbank2035 Greenhouse Gas Reduction Plan

The GGRP provides an inventory of current GHG emissions in Burbank. In addition, emission reduction measures and actions presented in the GGRP implement the goals, policies, and implementation actions of the Air Quality and Climate Change General Plan Element to reduce GHG emissions and improve overall air quality and environmental health.

The GGRP identifies both mandatory and voluntary GHG reduction measures that would apply to different types of future projects. For each of the mandatory measures, the GGRP either reinforces the implementation of current codes and ordinances or directs changes to the City's codes and ordinances that would result in GHG reductions. The GGRP requires all new projects to comply with these codes and ordinances, as applicable. Project consistency with the mandatory GRRP measures is discussed in [Table 5.2-4, Consistency with the City's Greenhouse Gas Reduction Plan](#).

Table 5.2-4
Consistency with Burbank2035 Greenhouse Gas Reduction Plan

GGRP Mandatory Measure	Project Consistency Analysis
Measure E-1.1: Energy Efficiency in New Construction	Consistent. This measure requires compliance with Title 24 Tier 1 of the California Code of Regulations (e.g., exceed current efficiency standards by 15 percent) beginning January 1, 2015. The Project has not yet defined design features related to energy efficiency. However, compliance with Measure E-1.1 is required as a Project condition of approval. Therefore, the Project design incorporates a 15 percent reduction in energy consumption.
Measure E-1.2: Energy Efficiency Retrofits	Not Applicable. This measure reduces energy-related emissions (i.e., electricity and natural gas) resulting from retrofitting existing residential units and commercial properties. As the Project proposes a new office building, retrofits would not apply.
Measure E-1.7: Building Shade Trees	Not Applicable. This measure requires the planting of shade trees next to single-family residential units to reduce energy-related emissions. The Project proposes the development of an office building; therefore, shade trees would not apply.
Measure E-2.1: Renewable Energy Requirements	Consistent. This measure requires the installation of solar hot water heaters in residential units and installation of grid-connected photovoltaic (PV) systems in residential and commercial uses. The Project would be consistent with Measure E-2.1 by providing 10 percent of its expected energy needs from on-site renewable sources as a Project condition of approval.
Measure T-2.1: Transportation Management Organization (TMO) Expansion	Consistent. This measure requires all new businesses with 25 or more employees located within the TMO boundary become TMO members and fulfill reporting requirements. This measure is applicable to the Project as the proposed Project is located within the TMO boundary. The proposed Project is located within proximity to a variety of public transportation options (i.e., Metrolink commuter rail, Metro Bus lines, and BurbankBus lines). Further, the proposed Project provides bicycle racks for tenants, electric vehicle charging stations, and complementary shuttle services to public transportation stops.
Measure SW-1.1: Food Scrap and Compostable Paper Diversion Ordinance	Consistent. Measure SW-1.1 assumes that residential and commercial uses will divert 75 percent and 90 percent, respectively, of food scraps and compostable paper from landfills by 2020. Although the ordinances identified in SW-1.1, SW-1.2, and SW-1.3 have not yet been adopted by the City, waste produced by the Project would be required to comply with the provisions of State Assembly Bill 939 (AB 939) and AB 341, requiring diversion of 50 percent of a jurisdiction's solid waste stream and 75 percent diversion of commercial waste, respectively.
Measure SW-1.2: Yard Waste Diversion Ordinance	
Measure SW-1.3: Lumber Diversion Ordinance	
Source: City of Burbank, <i>Burbank2035 Greenhouse Gas Reduction Plan</i> , February 19, 2013.	



As depicted in [Table 5.2-4](#), the proposed Project would be consistent with the City of Burbank's GGRP, which is the applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. It should be noted that at this time the Project has not identified design features related to energy efficiency or renewable energy. However, the Project is required comply with GGRP Measures E-1.1 and E-2.1, which require projects to exceed Title 24 energy efficiency standards by 15 percent and provide 10 percent of the expected energy needs from on-site renewable sources. Compliance with GGRP Measures are required as Project conditions of approval. As the Project would be consistent with the City's GGRP, impacts would be less than significant in this regard.

Conclusion

In summary, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the Scoping Plan, the 2016-2040 RTP/SCS, and the GGRP. Therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

POST-2020 ANALYSIS

Impact Analysis: Recent studies show that the State's existing and proposed regulatory framework will put the State on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.⁴² Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the Statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, which would require the State board to ensure that Statewide GHG are reduced to 40 percent below the 1990 level by 2030. As discussed above, 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.

⁴² Energy and Environmental Economics (E3), *Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios*, April 2015; Greenblatt, Jeffrey, Energy Policy, *Modeling California Impacts on Greenhouse Gas Emissions (Vol. 78, pp. 158-172)*, 2015. The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation and electricity sectors.



As discussed above, SCAG's RTP/SCS establishes a regulatory framework for achieving GHG reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors. Specifically, the 2016–2040 RTP/SCS would result in an estimated 8 percent decrease in per capita GHG emissions by 2020, an 18-percent decrease in per capita GHG emissions by 2035, and a 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.

The Project is the type of land use development that is encouraged by the RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the State's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with State climate targets for 2020 and beyond. In addition, as demonstrated above in [Table 5.2-3](#), the Project would be consistent with the Actions and Strategies set forth in the 2016–2040 RTP/SCS. Therefore, the Project would be consistent with the 2016–2040 RTP/SCS.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

5.2.5 CUMULATIVE IMPACTS

[Table 4-1, Cumulative Projects List](#), identifies the related projects and other possible development in the area determined as having the potential to interact with the proposed Project to the extent that a significant cumulative effect may occur. The following discussions are included per topic area to determine whether a significant cumulative effect would occur.

GREENHOUSE GAS EMISSIONS AND CONSISTENCY

- GREENHOUSE GAS EMISSIONS GENERATED BY THE PROPOSED PROJECT AND OTHER RELATED CUMULATIVE PROJECTS COULD HAVE A SIGNIFICANT IMPACT ON GLOBAL CLIMATE CHANGE.
- IMPLEMENTATION OF THE PROPOSED PROJECT AND OTHER RELATED CUMULATIVE PROJECTS COULD CONFLICT WITH AN APPLICABLE GREENHOUSE GAS REDUCTION PLAN, POLICY, OR REGULATION.

Impact Analysis: It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory.⁴³ GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective.⁴⁴ The additive effect of Project-

⁴³ California Air Pollution Control Officers Association, *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*, 2008.

⁴⁴ Ibid.



related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. In addition, the proposed Project as well as other cumulative related projects would also be subject to all applicable regulatory requirements that would further reduce GHG emissions. As shown in [Table 5.2-1](#), the Project would not exceed the Efficiency Target for Project Buildout (2026). Additionally, the Project would comply with the plans, policies, regulations and GHG reduction actions/strategies outlined in the Scoping Plan, the 2016-2040 RTP/SCS, and the GGRP. As such, the Project would not impede progress toward the reduction targets of AB 32 in 2020 and the Project's cumulative contribution of GHG emissions in 2020 and post-2020 would be less than significant.

Mitigation Measures: No mitigation measures are required.

Level of Significance: Less Than Significant Impact.

5.2.6 SIGNIFICANT UNAVOIDABLE IMPACTS

No significant unavoidable impacts related to GHG emissions have been identified in this section.



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