

## 6.7 GREENHOUSE GAS EMISSIONS

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### 6.7.1 OVERVIEW AND SUMMARY

*This Greenhouse Gas (GHG) Impact Analysis has been prepared to evaluate the potential environmental impacts associated with the proposed St. John's Seminary Residential Community project (proposed project). The purpose of this analysis is to identify the construction-related and operational GHG emissions that would be generated by the proposed project and compare these with the thresholds of significance recommended by the Ventura County Air Pollution Control District (VCAPCD). However, as there is no consensus on quantitative thresholds of significance for GHG emissions from development projects, this analysis also evaluates the consistency of the proposed project with the applicable policies that have been adopted to reduce statewide GHG emissions.*

*There are several unique challenges to analyzing greenhouse gas emissions and climate change under the California Environmental Quality Act (CEQA), largely because of the "global" nature of climate change. Typical CEQA analyses address local actions that have local – or, at most, regional – impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the "project-specific" impacts that a particular project is likely to generate. With regard to global climate change, however, it is generally accepted that while the magnitude of global warming effects is substantial, the contribution of an individual general development project is so small that direct project-specific significant impacts (albeit not cumulative significant impacts) are highly unlikely.*

*Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which the impacts are all measured within, and are linked to, a discrete region or area. Instead, a global climate change analysis must be considered on a global level, rather than the typical local or regional setting, and requires consideration of not only emissions from the project under consideration, but also the extent of the displacement, translocation, and redistribution of emissions. In the usual context, where air quality is linked to a particular location or area, it is appropriate to consider the creation of new emissions in that specific area to be an environmental impact whether or not the emissions are truly "new" emissions to the overall globe. When the impact is a global one, however, it makes more sense to consider whether the emissions really are new emissions, or are merely being moved from one place to another. For example, the approval of a new developmental plan or project does not necessarily create new automobile drivers - the primary source of a land use project's emissions. Rather,*

due to the “relocation” factor, new land use projects sometimes merely redistribute existing mobile emissions;<sup>1</sup> accordingly, the use of models that measure overall emissions increases without accounting for existing emissions will substantially overstate the impact of the development project on global warming. This makes an accurate analysis of GHG emissions substantially different from other air quality impacts, where the “addition” of redistributed emissions to a new locale can make a substantial difference to overall air quality.

## 6.7.2 LITERATURE AND DATA REVIEW

### Data Sources

This section is based on the information provided in the Greenhouse Gas Impact Analysis for the St. John’s Seminary Residential Community, by Douglas Kim + Associates, LLC, dated October 2016 (GHG Report). The GHG Report, including all calculation data is incorporated herein by this reference, and provided as **Appendix 6.7** to this EIR.

## 6.7.3 METHODOLOGY

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor’s Office of Planning and Research (OPR) on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The project emission reductions are results of project’s commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.<sup>2</sup> The General Reporting Protocol is based on the “Greenhouse Gas Protocol: A

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1 For example, a subdivision of 500 homes generates 5,000 new trips per day and those trips would be added to the local streets and intersections. In the case of climate change, the trips that are associated with those same 500 homes presumably would emit roughly the same volume of GHGs in the City of Los Angeles as they would if they were traveling the same number of miles in Cleveland, Ohio. As a result, while raw vehicle trip counts occurring within a project area will accurately predict changes in congestion at intersections, the same certainty cannot be provided for climate change. The trips would certainly increase the number of vehicles passing through local intersections, but they will not increase the amount of GHG emissions into the world’s atmosphere if those trips simply have been relocated from another location on the planet.

2 California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, [www.sfenvironment.org/sites/default/files/fliers/files/ccar\\_grp\\_3-1\\_january2009\\_sfe-web.pdf](http://www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf), accessed August 1, 2016.

Corporate Accounting and Reporting Standard” developed by the World Business Council for Sustainable Development and the World Resources Institute through “a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions.”<sup>3</sup> Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol’s reporting requirements.

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

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).<sup>4</sup>

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

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.<sup>5</sup> For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the Assembly Bill 32 (AB 32) reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies “should make a good-faith effort, based on available information, to calculate, model, or estimate... GHG emissions from a project, including the emissions associated with vehicular traffic,

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<sup>3</sup> Ibid.

<sup>4</sup> Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.

<sup>5</sup> California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, [www.arb.ca.gov/regact/2007/ghg2007/isor.pdf](http://www.arb.ca.gov/regact/2007/ghg2007/isor.pdf), accessed August 1, 2016.

energy consumption, water usage and construction activities.”<sup>6</sup> Therefore, direct and indirect emissions have been calculated for the project.

GHG emissions were quantified from construction and operation of the project using SCAQMD’s California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.<sup>7</sup>

#### 6.7.4 APPLICABLE REGULATIONS

##### International

##### *Kyoto Protocol*

In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States (the “U.S.”) joined other countries around the world in signing the United Nations’ Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50 voluntary programs for member nations to adopt.

The Kyoto Protocol (the “Protocol”) is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol’s commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

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<sup>6</sup> OPR Technical Advisory, p. 5.

<sup>7</sup> See [www.caleemod.com](http://www.caleemod.com).

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of “common but differentiated responsibilities.”

On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11<sup>th</sup> session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that \$100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed into law on April 22, 2016.

#### *The Western Regional Climate Action Initiative (WCI)*

The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region’s electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The ARB’s planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

## **Federal**

The United States Environmental Protection Agency (U.S. EPA) has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S. Supreme Court found that GHG emissions could be considered within the Clean Air Act’s definition of a pollutant.<sup>8</sup> In December 2009, U.S. EPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation.

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<sup>8</sup> Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 [2007])

In September 2009, the National Highway Traffic Safety Administration (NHTSA) and U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. By 2016, this could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon.

In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding \$8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, invests in renewable energy sources, calling for adaptation programs, and leading international efforts to address climate change. There have been numerous executive actions, proposed and finalized agency regulations, investment strategies, budgets requests, and international bilateral agreements. This includes a final rule for the Clean Power Plan in August 2015, which will cut carbon emissions from existing power plants 32 percent below 2005 levels by 2030.

### *Vehicle Standards*

Other regulations have been adopted to address vehicle standards including the U.S. EPA and the NHTSA joint rulemaking for vehicle standards.

- On March 30, 2009, the NHTSA issued a final rule for model year 2011.<sup>9</sup>
- On May 7, 2010, the U.S. EPA and the NHTSA issued a final rule regulating fuel efficiency and GHG emissions pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.<sup>10</sup>
- On August 9, 2011, U.S. EPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG emissions and fuel economy standards for model year 2017-2025 light-duty vehicles.<sup>11</sup>
- NHSTA intends to set standards for model years 2022-2025 in a future rulemaking.<sup>12</sup>
- In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the U.S. EPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks that applies to vehicles from model year 2014–2018.<sup>13</sup>

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<sup>9</sup> NHSTA. 2009. Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule. 75 Fed. Reg. 25324.

<sup>10</sup> U.S. EPA. 2010. Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule. 75 Fed. Reg. 25324.

<sup>11</sup> Available <http://www.gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf>. Accessed July 2016.

<sup>12</sup> NHSTA. 2012. 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards. 77 Fed. Reg. 62624.

***Energy Independence and Security Act (the “EISA”)***

Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

- Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard (RFS) requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.

While superseded by NHTSA and U.S. EPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

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

**State*****Assembly Bill 1493***

California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 by then-Assemblymember Fran Pavley was enacted in September 2003 and requires regulations to achieve “the maximum feasible reduction of greenhouse gases” emitted by vehicles used for personal transportation.

***Executive Order S-3-05***

On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: 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 California Environmental Protection Agency (Cal EPA) formed a Climate Action Team (“CAT”) that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the

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<sup>13</sup> U.S. EPA Office of Transportation and Air Quality. 2011. EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles. Available: <http://www.epa.gov/otaq/climate/documents/420f11031.pdf>.

targets established in the Executive Order.<sup>14</sup> Furthermore, the report provided to Governor Schwarzenegger in 2006 indicated that smart land use and increased transit availability should be a priority in the State of California.<sup>15</sup> According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

#### ***Executive Order B-30-15***

On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meet its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs the California Air Resources Board (ARB) to update the Climate Change Scoping Plan.

A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it 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 study could allow the State to meet the 2030 and 2050 targets.<sup>16</sup>

#### ***Assembly Bill 32***

In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that ARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide

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<sup>14</sup> California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

<sup>15</sup> California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.

<sup>16</sup> Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172).

GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

AB 32 charges ARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, ARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.<sup>17</sup> On October 25, 2007, ARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexafluoride emissions from the non-electricity sector. ARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO<sub>2</sub> per year and make up 94 percent of the point source CO<sub>2</sub> emissions in California.

ARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by ARB in coordination with the CAT, was first published in October 2008 (the “2008 Scoping Plan”). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state’s dependence on oil, diversify the state’s energy sources, save energy, create new jobs, and enhance public health. It accommodated the State’s projected population growth. Moreover, it expressly encouraged called for coordinated planning of growth, including the location of dense residential projects near transportation infrastructure, including public transit.

An important component of the plan is a cap-and-trade program covering 85 percent of the state’s emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California’s clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, ARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

In order to assess the scope of reductions needed to return to 1990 emissions levels, ARB first estimated the 2020 “business-as-usual” (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020

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<sup>17</sup> California Air Resources Board, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.

BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, ARB approved a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).<sup>18</sup> ARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.<sup>19</sup> Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent).

On May 22, 2014, ARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 MMTCO<sub>2e</sub> 1990 emissions level would be slightly higher than identified in the original Scoping Plan, at 431 MMTCO<sub>2e</sub>. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 MMTCO<sub>2e</sub> or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. ARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by ARB would serve to reduce the project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors.<sup>20,21</sup>

As shown in **Table 6.7-1, Emission Reductions Needed to Meet AB 32 Objectives in 2020** these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program.

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<sup>18</sup> California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.

<sup>19</sup> California Air Resources Board, Greenhouse Gas Inventory – 2020 Emissions Forecast, <http://www.arb.ca.gov/cc/inventory/data/forecast.htm>, accessed July 2016.

<sup>20</sup> CARB, First Update, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]

<sup>21</sup> CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

**Table 6.7-1  
Emission Reductions Needed to Meet AB 32 Objectives in 2020**

<b>Sector</b>	<b>Million Metric Tons of CO<sub>2</sub>e Reduction</b>	<b>Percent of Statewide CO<sub>2</sub>e Inventory</b>	<b>Summary of Recommended Actions</b>
Energy	-25	-4.9%	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
<b>Total</b>	<b>-78</b>	<b>-15.3%</b>	

Source: California Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.

Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged with reducing 4.5% of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

### **Senate Bill 32**

Senate Bill 32 (SB 32) was signed into law on August 31, 2016. This bill requires CARB to adopt rules and regulations to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

### *Cap-and-Trade Program*

ARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed “covered entities”) by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32’s emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program’s duration.

Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO<sub>2</sub>e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO<sub>2</sub>e per year “inclusion threshold” is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or “MRR”). ARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

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

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

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

While the 2020 cap would remain in effect post-2020,<sup>22</sup> the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.<sup>23</sup> However, ARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The “recommended action” in the First Update for the Cap-and-Trade Program is: “Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target.”<sup>24</sup> The “expected completion date” for this recommended action is 2017.<sup>25</sup> It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

### ***Senate Bill 1368***

Senate Bill (SB) 1368 requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

### ***SB 97 & CEQA Guidelines***

In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor’s Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the ARB Scoping Plan is not a sufficient basis to determine that a project’s GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the ARB’s recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;

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<sup>22</sup> California Health & Safety Code § 38551(a) (“The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.”)

<sup>23</sup> See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.

<sup>24</sup> CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).

<sup>25</sup> Ibid.

- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

### ***State Bill 375***

On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for ARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations (“MPOs”) to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent ARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.<sup>26</sup>

On October 24, 2008, ARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). ARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO<sub>2e</sub> per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, ARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.<sup>27</sup> There is currently no timetable for finalized thresholds.

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<sup>26</sup> American Planning Association, California Chapter, Analysis of SB 375, <http://www.calapa.org/-en/cms/?2841>, accessed July 2016.

<sup>27</sup> California Air Resources Board, <http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf>

On September 23, 2010, ARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.<sup>28</sup> For the area under the Southern California Association of Governments' (SCAG) jurisdiction—including the project area—ARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the ARB's Executive Officer approved the final targets.<sup>29</sup>

#### ***Senate Bill 350***

On October 7, 2015, Senate Bill 350: Clean Energy and Pollution Reduction Act (SB 350) was signed into law, establishing new clean energy, clean air and greenhouse gas reduction goals for 2030 and beyond. Building off of AB 32, SB 350 established California's 2030 greenhouse gas reduction target of 40 percent below 1990 levels. To achieve this goal, SB 350 set ambitious 2030 targets for energy efficiency and renewable electricity, among other actions aimed at reducing greenhouse gas emissions. SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. This will increase the use of Renewables Portfolio Standard (RPS) eligible resources, including solar, wind, biomass, geothermal, and others. In addition, SB 350 requires the state to double statewide energy efficiency savings in electricity and natural gas end uses by 2030.

#### ***Assembly Bill 197***

On September 8, 2016, Assembly Bill 197 (AB 197) was signed into law. This bill requires CARB to make available the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants for each facility that reports to the state board and air districts. In addition, this bill requires that CARB make available the emissions of greenhouse gases, criteria pollutants, and toxic air contaminants throughout the state, broken down to a local and sub-county level for stationary sources and to at least a county level for mobile sources, as specified.

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

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. The standards are

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<sup>28</sup> California Air Resources Board, Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375, <http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf>

<sup>29</sup> California Air Resources Board, 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.

updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

### *California Green Building Standards*

The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the “CCR”), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The updated 2013 CALGreen Code became effective January 1, 2014 and includes new requirements for additions to existing residential and non-residential development.

## **Regional**

### *Ventura County Air Pollution Control District*

The VCAPCD has not adopted guidance for assessing the GHG impacts of CEQA projects.

### *SCAG Regional Transportation Plan/Sustainable Communities Strategy*

SCAG’s adopted its 2012-2035 Regional Transportation Plan Sustainable Communities Strategy (the “RTP/SCS”) on April 4, 2012. The RTP/SCS called for concentrating future development and providing higher intensity development in proximity to transit hubs in order to reduce vehicle miles traveled and GHG emissions from personal vehicles. It is important to note that there is nothing in SB 375 that requires a city's "land use policies and regulations...to be consistent with the regional transportation plan or an alternative planning strategy."<sup>30</sup>

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<sup>30</sup> California Gov’t. Code §65080(b)(2)(E).

The RTP/SCS also includes an appendix listing examples of measures that could reduce impacts from planning, development, and transportation.<sup>31</sup> It notes, however, that the example measures are "not intended to serve as any kind of checklist to be used on a project-specific basis." Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized. Example GHG emissions reduction measures include the following:

**GHG1:** SCAG member cities and the county governments may adopt and implement Climate Actions Plans (CAPS, also known as Plans for the Reduction of Greenhouse Gas Emissions as described in CEQA Guidelines Section 15183.5 Tiering and Streamlining the Analysis of Greenhouse Gas Emissions).

**GHG2:** Project sponsors may require Best Available Control Technology (BACT) during construction and operation of projects, including:

- Solicit bids that include use of energy and fuel-efficient fleets;
- Solicit preference construction bids that use BACT, particularly those seeking to deploy zero-and/or near zero emission technologies;
- Employ use of alternative fueled vehicles;
- Use lighting systems that are energy efficient, such as LED technology;
- Use CEQA Guidelines Appendix F, Energy Conservation, to create an energy conservation plan;
- Streamline permitting process to infill, redevelopment, and energy-efficient projects;
- Use an adopted emissions calculator to estimate construction-related emissions;
- Use the minimum feasible amount of GHG-emitting construction materials that is feasible;
- Use of cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
- Use of lighter-colored pavement where feasible;
- Recycle construction debris to maximum extent feasible; and

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<sup>31</sup> Southern California Association of Governments, *Final PEIR, 2012-2035 RTP/SCS, Appendix G*: [http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf).

- Plant shade trees in or near construction projects where feasible.

**GHG3:** Local jurisdictions can and may establish a coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.

**GHG4:** Pedestrian and Bicycle Promotion: Local jurisdictions may work with local community groups and business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation.

**GHG5:** Waste Reduction: Local jurisdictions can and may organize workshops on waste reduction activities for the home or business, such as backyard composting, or office paper recycling, and may schedule recycling drop-off events and neighborhood chipping/mulching days.

**GHG6:** Water Conservation: Local jurisdictions may organize support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, and installing advanced irrigation systems.

**GHG7:** Energy Efficiency: Local jurisdictions may organize workshops on steps to increase energy efficiency in the home or business, such as weatherizing the home or building envelope, installing smart lighting systems, and how to conduct a self-audit for energy use and efficiency.

**GHG8:** Schools Programs: Local jurisdictions may develop and implement a program to present information to schoolchildren about climate change and ways to reduce GHG emissions, and may support school-based programs for GHG reduction, such as school based trip reduction and the importance of recycling.

On April 6, 2016, SCAG adopted its 2016-2040 RTP/SCS update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040. However, until the 2016-2040 RTP/SCS is incorporated into the region's federally-approved AQMP, the 2012-2035 RTP/SCS is the relevant transportation plan for air quality regulatory purposes.

### *City of Camarillo*

The City has not adopted a climate action plan, policies, or ordinances that regulate GHG emissions. The City enforces Statewide green building practices through the Title 24 compliance process.

## 6.7.5 EXISTING CONDITIONS

### Environmental Setting

The global nature of climate change creates unique challenges for assessing the project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of greenhouse gases (GHG) across the globe, a single project's impact will be negligible. To further complicate this, there is debate about whether a project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting CO<sub>2</sub> into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO<sub>2</sub> in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental effects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a project's incremental contribution of CO<sub>2</sub> into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the project are discussed in this section.

### Pollutants and Effects

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

GHGs that contribute to the greenhouse effect include:

- **Carbon Dioxide (CO<sub>2</sub>)** is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO<sub>2</sub> emissions from motor vehicles occur

during operation of vehicles and operation of air conditioning systems. CO<sub>2</sub> comprises over 80 percent of GHG emissions in California.<sup>32</sup>

- **Methane (CH<sub>4</sub>)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Methane makes up 8.3 percent of all GHGs, and mobile sources and general fuel combustion represent 0.69 percent of overall methane emissions.<sup>33</sup>
- **Nitrous Oxide (N<sub>2</sub>O)** is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 12 percent of N<sub>2</sub>O emissions.<sup>34</sup> N<sub>2</sub>O emissions from motor vehicles generally occur directly from operation of vehicles.
- **Hydrofluorocarbons (HFCs)** are one of several high global warming potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.
- **Perfluorocarbons (PFCs)** are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.
- **Sulfur Hexafluoride (SF<sub>6</sub>)** is another high GWP gas that is not naturally occurring and is generated in a variety of industrial processes. Emissions of SF<sub>6</sub> are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.<sup>35</sup> As illustrated in **Table 6.7-2, Global Warming Potential For Greenhouse Gases** the other GHGs are less abundant but have higher GWP than CO<sub>2</sub>. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO<sub>2</sub>, denoted as CO<sub>2</sub>e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO<sub>2</sub> were being emitted. High GWP gases such as HFCs, PFCs, and SF<sub>6</sub> are the most heat-absorbent.

**Table 6.7-2**  
**Global Warming Potential For Greenhouse Gases**

<b>Greenhouse Gas</b>	<b>Global Warming Potential Factor (100-Year)</b>
Carbon Dioxide (CO <sub>2</sub> )	1
Methane (CH <sub>4</sub> )	25

<sup>32</sup> California Environmental Protection Agency, First Update to the Climate Change Scoping Plan, May 2014.

<sup>33</sup> Ibid.

<sup>34</sup> United States Energy Information Administration, Emissions of Greenhouse Gases in the U.S., March 2011.

<sup>35</sup> California Air Resources Board, Climate Change Emission Control Regulations, 2004

Greenhouse Gas	Global Warming Potential Factor (100-Year)
Nitrous Oxide (N <sub>2</sub> O)	298
Perfluorocarbons (PFCs)	7,390-12,200
Hydrofluorocarbons (HFCs)	124-14,800
Sulfur Hexafluoride (SF <sub>6</sub> )	22,800

*Source:* Southern California Association of Governments, Draft Program EIR for 2016 RTP/SCS, November 24, 2015.

*Note:* Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21<sup>st</sup> century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels.<sup>36</sup> If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion, and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the

<sup>36</sup> California Energy Commission, The Impacts of Sea Level Rise on the San Francisco Bay, July 2012.

additional impact of climate change. The Strategy's key preliminary adaptation recommendations include:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant State projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and
- Inclusion of climate change impact information into fire program planning by State firefighting agencies.

## Existing Emissions

The project site is currently occupied by the vacant St. John's Seminary College buildings and citrus and avocado orchards, which provide no substantial sources of anthropogenic GHG emissions.

### 6.7.6 THRESHOLDS OF SIGNIFICANCE

#### CEQA Significance Thresholds

CARB, VCAPCD, and the City of Camarillo have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the project. As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.<sup>37</sup>

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a “life-cycle” analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). Further, it states that:

1. A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment:
  - a. The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
  - b. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
  - c. 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 greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project’s incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA

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<sup>37</sup> A recent opinion by the California Supreme Court on November 30, 2015 (Center for Biological Diversity v. California Department of Fish and Wildlife) has suggested that environmental analyses need to support its assumptions and provide evidentiary support to find consistency with a “Business as Usual” approach with the AB 32 Scoping Plan.

Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.<sup>38</sup> Examples of such programs include a “water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions.”<sup>39</sup> Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.<sup>40</sup>

Per CEQA Guidelines Section 15064(h)(3), a project’s incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.<sup>41</sup>

To evaluate a project’s potential greenhouse gas emissions under CEQA, a lead agency may adopt a significance criterion of whether the project will be consistent with statewide greenhouse gas emission reduction goals, as set forth in the California Global Warming Solutions Act of 2006 (or “AB 32”) and the California Air Resources Board 2008 Climate Change Scoping Plan (“Scoping Plan”) that implements

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<sup>38</sup> Ibid.

<sup>39</sup> Ibid. (emphasis added).

<sup>40</sup> See San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance for Projects Subject to ARB’s GHG Cap-and-Trade Regulation, APR–2030 (June 25, 2014), where the SJVAPCD “determined that GHG emissions increases that are covered under ARB’s Cap-and-Trade regulation cannot constitute significant increases under CEQA...” Further, SCAQMD has taken this position as a lead agency, preparing three Negative Declarations and one Draft EIR that applied its 10,000 MTCO<sub>2</sub>e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH #2012041014 ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar\\_neg\\_dec.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2)) (October 2014); SCAQMD, Final Negative Declaration for Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2)); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd\\_final.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2)) (December 2014); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 ([www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2)) (April 2014).

<sup>41</sup> 14 CCR § 15064(h)(3).

AB 32. (Center for Biological Diversity v. Cal. Dept. of Fish and Game (2015) 62 Cal.4th 204, 220; see also CEQA Guidelines § 15064.4.)

The statewide greenhouse gas reduction goals include cutting greenhouse gas emissions by approximately 30 percent from the BAU emission levels projected for 2020. The Scoping Plan sets forth the BAU projection, which assumes no conservation or regulatory efforts beyond what was in place when the forecast was made. A lead agency may use the BAU projection as the baseline to compare a project's expected greenhouse gas emissions rather than using a baseline of emissions in the existing physical environment. However, the lead agency must provide substantial evidence to show that a project's specific project-level reduction in greenhouse gas emissions as compared to the BAU projection will actually meet the statewide goals of greenhouse gas reductions.

There are three ways a lead agency could make that showing. First, a lead agency may evaluate the data behind the Scoping Plan's BAU model to determine how a specific project in a proposed location would contribute to the statewide greenhouse gas reduction goals. Second, a lead agency may assess a project's consistency with AB 32's goals in whole or in part by considering a project's compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, such as building efficiency and conservation standards. Third, a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions reductions.

Thus, in the absence of any adopted, quantitative threshold, the project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy; and
- City of Camarillo building code, Title 24 and CALGreen requirements

The following section provides an extensive analysis of the proposed project's consistency with these State, regional, and local climate action-related policies. This section focuses on disclosing potential GHG emissions.

### 6.7.7 ENVIRONMENTAL IMPACTS

**Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

#### *Impacts*

##### **Construction**

Construction of the proposed project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the project site. These impacts would vary day to day over the 38-month duration of construction activities. As illustrated in **Table 6.7-3, Estimated Construction Emissions - Mitigated** construction emissions of CO<sub>2</sub> would peak in 2019, when up to 31,009 pounds of CO<sub>2</sub>e per day are anticipated following implementation of recommended **Mitigation Measure 6.3-1** (Refer to **Section 6.3 Air Quality**). These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State.

**Table 6.7-3  
Estimated Construction Emissions - Mitigated**

Construction Year	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
2018	11,676	4	0	11,751
2019	30,856	7	0	31,009
2020	30,138	6	0	30,263
2021	30,138	6	0	30,263

*Source: DKA Planning 2016, based on CalEEMod 2013.2.2*

##### **Operation**

Greenhouse gas emissions were calculated for long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The project emission reductions are results of project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

This analysis compares the project's GHG emissions to the emissions that would be generated by the project in the absence of any GHG reduction measures (i.e., the No Action Taken ("NAT") Scenario. This approach is consistent with the concepts used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions under NAT scenarios and from the project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the project's GHG emissions at build-out.

The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a NAT scenario would apply a base ITE trip-generation rate for the project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation. The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place when CARB prepared the *Supplemental FED* (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

Emissions calculations for the project include credits or reductions for the regulatory compliance measures and project design features set forth throughout this analysis, such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown in **Table 6.7-4, Estimated Annual CO<sub>2</sub>e Greenhouse Gas Emissions (Metric Tons Per Year)** the emissions for the project and its associated CARB 2020 NAT scenario are estimated to be 3,227 and 4,679 MTCO<sub>2</sub>e per year, respectively, which shows the project will reduce emissions by 31 percent from the CARB 2020 NAT scenario. Based on these results, the project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

**Table 6.7-4**  
**Estimated Annual CO<sub>2</sub>e Greenhouse Gas Emissions (Metric Tons per Year)**

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	4	4	-	0%
Energy Sources	1,408	816	-591	-42%
Mobile Sources	2,887	2,027	-860	-30%
Waste Sources	133	133	-	0%
Water Sources	139	139	-	0%
Construction	151	151	-	0%
Total Emissions	4,720	3,269	-1,451	-31%
Net Emissions	-	3,269	N/A	N/A

*Daily construction emissions amortized over 30-year period pursuant to CARB guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.*

*\* NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

*Source: DKA Planning, 2016.*

The analysis in this report uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the proposed project's impact (i.e., 15.3 percent reduction from NAT). The report's methodology is to compare the project's emissions as proposed to the project's emissions if the project were built using a NAT approach in terms of design, methodology, and technology. This means the project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32. While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the proposed project would contribute to statewide GHG reduction goals.

It should be noted that each source category of GHG emissions from the proposed project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- Transportation. Both construction and operational activities from the project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.

- Energy Use. Both construction and operational activities from the project site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.
- Building structures. Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by CALGreen building codes.
- Water and wastewater use. The project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- Major appliances. The project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.
- Solid waste management. The project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the CO<sub>2</sub> estimates from mobile sources (particularly CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the region to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in Ventura County and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

As described throughout this analysis, the project contains numerous regulatory compliance measures and project design features that would reduce the project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. As a result of this and the analysis of net emissions, the project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

*Mitigation Measures*

None Required

*Residual Impacts*

Project-specific impacts related to the emission of greenhouse gases would be less than significant.

**Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

*Impacts*

The project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the proposed project would be consistent with a number of relevant plans and policies that govern climate change, including:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy; and
- City of Camarillo municipal code, Title 24 and CALGreen requirements

*Consistency with Executive Orders S-03-05 and B-30-15*

The project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Although the project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the project's emissions profile to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in project emissions once fully constructed and operational, the project is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by CARB would serve to reduce the project's post-2020 emissions level to the extent applicable by law and help lay the foundation "...for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan.<sup>42,43</sup>

As such, the project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Orders S-3-05 and B-30-15.

### *Consistency with the AB 32 Scoping Plan*

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. **Table 6.7-5, Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies** evaluates the proposed project's consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. The proposed project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

- **Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the project's emissions level.<sup>44</sup> Additionally, further additions to California's renewable resource portfolio would favorably influence the project's emissions level.<sup>45</sup>
- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the project's emissions level.<sup>46</sup>
- **Water Sector:** The project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies.<sup>47</sup>
- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the project's emissions level.<sup>48</sup>

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<sup>42</sup> CARB, First Update, p. 4, May 2014. See also *id.* at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."]

<sup>43</sup> CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.

<sup>44</sup> CARB, First Update, pp. 37-39, 85, May 2014.

<sup>45</sup> CARB, First Update, pp. 40-41, May 2014.

<sup>46</sup> CARB, First Update, pp. 55-56, May 2014.

<sup>47</sup> CARB, First Update, p. 65, May 2014.

<sup>48</sup> CARB, First Update, p. 69, May 2014.

**Table 6.7-5  
Project Consistency with AB 32 Scoping Plan Greenhouse Gas emission Reduction Strategies**

Strategy	Project Consistency
<b>California Cap-and-Trade Program.</b> Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	<b>Not Applicable.</b> The statewide program is not relevant to the proposed project.
<b>California Light-Duty Vehicle Greenhouse Gas Standards.</b> Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	<b>Not Applicable.</b> The development of standards is not relevant to the proposed project.
<b>Energy Efficiency.</b> Maximize energy efficiency building and appliance standards and pursue additional efficiency efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	<b>Consistent.</b> The project is designed to meet Cal Green building standards by including several measures designed to reduce energy consumption.
<b>Renewables Portfolio Standard.</b> Achieve 33 percent renewable energy mix statewide.	<b>Consistent.</b> The project will utilize energy from Southern California Edison, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
<b>Low-Carbon Fuel Standard.</b> Develop and adopt the Low Carbon Fuel Standard.	<b>Not Applicable.</b> The statewide program is not relevant to the proposed project.
<b>Regional Transportation-Related Greenhouse Gases.</b> Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	<b>Not Applicable.</b> The development of regional planning goals is not relevant to the proposed project.
<b>Vehicle Efficiency Measures.</b> Implement light-duty vehicle efficiency measures.	<b>Not Applicable.</b> State agencies are responsible for implementing efficiency measures.
<b>Goods Movement.</b> Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	<b>Not Applicable.</b> State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
<b>Million Solar Roofs Program.</b> Install 3,000 MW of solar-electric capacity under California's existing solar programs.	<b>Neutral.</b> The proposed project does not include solar roofs and is not part of the proposed Statewide initiative.
<b>Medium/Heavy-Duty Vehicles.</b> Adopt medium and heavy-duty vehicle efficiency measures.	<b>Not Applicable.</b> State agencies are responsible for implementing efficiency measures.
<b>Industrial Emissions.</b> Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	<b>Not Applicable.</b> This measure addresses industrial facilities.
<b>High Speed Rail.</b> Support implementation of a high speed rail system.	<b>Not Applicable.</b> This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
<b>Green Building Strategy.</b> Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	<b>Consistent.</b> The project is designed to meet Cal Green building standards and will include several measures designed to reduce energy consumption.
<b>High Global Warming Potential Gases.</b> Adopt measures to	<b>Not Applicable.</b> State agencies are responsible

Strategy	Project Consistency
reduce high global warming potential gases.	for implementing these measures.
<b>Recycling and Waste.</b> Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	<b>Consistent.</b> The project is expected to have minimal impact on solid waste facilities.
<b>Sustainable Forests.</b> Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	<b>Not Applicable.</b> Resource Agency departments are responsible for implementing this measure.
<b>Water.</b> Continue efficiency programs and use cleaner energy sources to move and treat water.	<b>Consistent.</b> The project would use water-efficient landscaping.
<b>Agriculture.</b> In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	<b>Not Applicable.</b> The proposed project does not include agricultural facilities.

Source: DKA Planning, 2016.

Based on this evaluation, this analysis finds the project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

#### *Consistency with SCAG's 2016-2040 RTP/SCS*

At the regional level, the 2016-2040 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the project's potential to conflict with the RTP/SCS, this section analyzes the project's land use profile for consistency with those in the 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 Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The proposed project is generally consistent with the 2016 RTP/SCS and its focus on integrated land use planning.

**Table 6.7-6**  
**Project Consistency with SCAG 2016-2040 RTP/SCS**

Actions and Strategies	Responsible Party(ies)	Consistency Analysis <sup>a</sup>
<i>Land Use Strategies</i>		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	<b>Consistent.</b> The project would include residences that would add to the supply of housing in Ventura County.
Focus new growth around transit.	Local Jurisdictions	<b>Inconsistent.</b> The proposed project would be located about 4.3 miles from the Camarillo Metrolink station

Actions and Strategies	Responsible Party(ies)	Consistency Analysis <sup>a</sup>
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	and is generally not accessible by transit. <b>Inconsistent.</b> The proposed project is not located along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	<b>Consistent.</b> The proposed project would indirectly address the provision of facilities that promote Neighborhood Electric Vehicles for short trips by providing EV and golf cart parking at the Community Recreation Center.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	<b>Not Applicable.</b> While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the proposed project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	<b>Neutral.</b> The proposed project would convert existing farmlands, however it would provide 40.10 acres of open space.
<b>Transportation Strategies</b>		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> While this strategy calls on investing in the maintenance of our existing transportation system, the proposed project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	<b>Consistent.</b> The proposed project is a residential project with modest trip generation impacts that will minimize congestion impacts on the region.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> While this strategy aims to improve the safety of the transportation system and protect users from security threats, the proposed project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	<b>Not Applicable.</b> This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The proposed project would not interfere with this larger goal of investing in the transportation system.
<i>Technological Innovation and 21st Century Transportation</i>		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	<b>Consistent.</b> While this action/strategy is not necessarily applicable on a project-specific basis, the project would include pre-wiring for electric vehicle charging

Actions and Strategies	Responsible Party(ies)	Consistency Analysis <sup>a</sup>
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	infrastructure. <b>Consistent.</b> While this action/strategy is not necessarily applicable on a project-specific basis, the project would include pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	<b>Not Applicable.</b> While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the proposed project would not interfere with these emerging programs.

Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.

**Table 6.7-6, Project Consistency with SCAG 2016-2040 RTP/SCS** demonstrates the project’s general consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The project would also be generally consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

#### *Consistency with the City of Camarillo Building Ordinance, Title 24, and CALGreen Requirements*

The proposed project will comply with the City of Camarillo building ordinance, which compels compliance with CALGreen for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. It would also require compliance with Title 24’s focus on energy-efficient buildings through improved design of the building envelope, heating and cooling, water heating, and lighting features.

Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the project’s incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be **less than significant**.

### *Mitigation Measures*

None Required

### *Residual Impacts*

Project-specific impacts would be less than significant.

## **6.7.8 CUMULATIVE ANALYSIS**

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, CARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as energy, mobile, and construction, would be covered by the Cap-and-Trade Program.

Currently, there are no applicable CARB, VCAPCD, or City of Camarillo significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the project's contribution to cumulative GHG emissions and global climate change would be less than significant if the project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; AB 32, the 2016-2040 RTP/SCS and the City of Camarillo's municipal code.

Implementation of the project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the CARB's Climate Change Scoping Plan for the implementation of AB 32.

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

As part of SCAG's 2016-2040 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The project results in significant reductions in comparison to NAT and would be consistent with the SCS/RTP.

The project also would comply with the City of Camarillo building code, which emphasizes improving energy conservation and energy efficiency. Additionally, the project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and project design features to reduce VMT and to reduce the project's potential impact with respect to GHG emissions. With implementation of these features, the project results in a 31 percent reduction in GHG emissions from NAT. The project's GHG reduction measures make the project consistent with AB 32.

As discussed above, the project is consistent with the applicable GHG reduction plans and policies. The NAT comparison demonstrates the efficacy of the measures contained in these policies. Moreover, while the project is not directly subject to the Cap and Program, that Program will indirectly reduce the project's GHG emissions by regulating "covered entities" that affect the project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

Thus, given the project's consistency with State, regional, GHG emission reduction goals and objectives and the City of Camarillo's building code the project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the project's impacts would be cumulatively less than significant.

### ***Mitigation Measures***

None Required

*Residual Impacts*

Project-specific and cumulative impacts related to the emission of greenhouse gases would be less than significant.