

## 5.6 Greenhouse Gas Emissions

### 5.6.1 Introduction

A greenhouse gas (GHG) analysis was prepared by iLanco Environmental, LLC (iLanco) to evaluate the potential GHG impacts of the proposed Project. The analysis in the following sections focuses on the existing conditions and operations of the Project site, thresholds of significance, analysis methodology, and the potential short- and long-term GHG impacts of the proposed Project. The “Air Quality and Greenhouse Gas Analysis” study (referred to as the “GHG Report” in this section) prepared in February 2017 by iLanco is included in Appendix E. The findings and recommendations of that analysis are summarized below.

### 5.6.2 Environmental Setting

Proposed activities would be limited to the Project vicinity, within the South Coast Air Basin (SCAB). The SCAB includes all of Orange County, and the urban portions of Los Angeles, San Bernardino, and Riverside counties. The SCAB covers an area of approximately 15,500 square kilometers (6,000 square miles) and is bounded on the west by the Pacific Ocean; on the north and east by the San Gabriel, San Bernardino, and San Jacinto mountains; and on the south by the San Diego county line; however, greenhouse gas emissions and their potential impacts associated with climate change are a global issue that go beyond the boundaries of the Project vicinity and SCAB.

Gases that trap heat in the atmosphere are called greenhouse gases. The term GHGs includes gases that contribute to the natural greenhouse effect, such as carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O), as well as gases that are only human-made and that are emitted through the use of modern industrial products, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>). These last four families of gases, while not naturally present in the atmosphere, can trap infrared radiation when present. The effect each of these gases has on global warming is a combination of the volume of their emissions and their 100-year global warming potential. GWP, a unit-less quantity, indicates, on a pound-for-pound basis, how much a given GHG could contribute to global warming relative to how much warming would be caused by the same mass of CO<sub>2</sub>.

The most important GHG in human-induced global warming is CO<sub>2</sub>. While many gases have higher GWPs than the naturally occurring GHGs, CO<sub>2</sub> is emitted in higher quantities and accounts for 84 percent of the GWP of all GHGs emitted by the United States. Fossil fuel combustion, especially from the generation of electricity and powering of motor vehicles, has led to substantial increases in CO<sub>2</sub> emissions and thus substantial increases in global atmospheric CO<sub>2</sub> concentrations over the last century.

GHGs differ from air quality pollutants in that GHG emissions do not cause direct adverse human health effects. Rather, the direct environmental effect of GHG emissions is the increase in global temperatures, which in turn may have numerous indirect effects on the environment and humans. For example, some observed changes could include shrinking glaciers; thawing permafrost; later freezing and earlier break-up of ice on rivers, lakes, and oceans; a lengthened growing season; shifts in plant and animal ranges;

and earlier flowering of trees. Other, longer term environmental impacts of global warming could include sea level rise; changing weather patterns with increases in the severity of storms and droughts; changes to local and regional ecosystems, including the potential loss of species; and a reduction in winter snow pack. Current predictions suggest that in the next 25 years, California could experience longer and more extreme heat waves, greater intensity and frequency of heat waves, and longer dry periods. More specifically, the California Climate Action Team (CAT) biennial assessment on climate change impacts and adaptation options for California predicted that California could witness the following events:

- Temperature rise between 2.7-10.5°F by the 2070–2100 time period;
- Sea level rise of 11–18 inches by 2050 and 23-55 inches by 2100;
- Drier (by 5 percent or more) than historical average precipitation, with a greater amount of drying in southern California (with precipitation decreases in some scenarios exceeding 15 percent);
- A decrease in cotton, maize, sunflower, and wheat yields from 3 percent to 8 percent by 2050, and decreased yields for all crops except alfalfa by 2100; and
- An increase in fire risk and estimated burned area increases from 57 percent to 169 percent by 2085.

Risks to public health are also summarized in the CAT assessment. As stated above, climate change is predicted to lead to increases in the frequency, intensity, and duration of extreme heat events and heat waves in California. This is likely to increase the risk of mortality and morbidity due to heat-related illness on the elderly; individuals with chronic conditions such as heart and lung disease, diabetes, and mental illnesses; infants; the socially or economically disadvantaged; and those who work outdoors. The expected increase in temperatures and resulting increases in ultraviolet radiation due to climate change may also likely exacerbate existing air quality problems.

### **5.6.3 Existing Conditions**

Existing zoning in the ELSP allows for predominantly residential development; however, much of the Project site remains undeveloped except for the existing Summerly residential neighborhood and The Links at Summerly Golf Course in proposed Planning Area 1; Serenity residential neighborhood in proposed Planning Area 4; Lake Elsinore Motocross facility in proposed Planning Area 2; Skylark Airport and minimal industrial development in proposed Planning Area 3; and sparse residential development in proposed Planning Area 8. Existing development was analyzed as part of the baseline conditions that include the following:

- 325 low-rise apartment dwelling units;
- 911 single-family housing dwelling units;
- 169 acres of golf club;
- 535 acres of open space;
- 243 acres of active recreation space (inclusive of the Lake Elsinore Motocross facility);
- 5.5 acres of city park; and
- Skylark Airport

## 5.6.4 Regulatory Setting

Sources of air emissions in the SCAB are regulated by EPA, CARB, and SCAQMD. In addition, regional and local jurisdictions play a role in air quality management. The role of each regulatory agency is discussed below.

### Federal Regulations

#### Energy Independence and Security Act (2007)

The Energy Independence and Security Act of 2007 was signed into law on December 19, 2007 and includes provisions covering:

- Renewable Fuel Standard (Section 202);
- Appliance and Lighting Efficiency Standards (Section 301–325); and
- Building Energy Efficiency (Sections 411–441).

Additional provisions of the Energy Independence and Security Act 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”.

The Renewable Fuel Standard is of some relevance to the proposed Project as the regulations require annual increases in biofuels sold – both biodiesel and bioethanol – from the years 2010-2022. By year 2022, the Renewable Fuel Standard will require at least 74 billion gallons of biofuel to be sold in the US, as compared to the 2010 level of approximately 14.5 billion gallons. This act, although not directly relevant to proposed Project activities, serves to highlight the developing GHG regulatory framework.

#### Greenhouse Gas Endangerment Finding (2009)

The 2007 U.S. Supreme Court decision (*Massachusetts et al. v. Environmental Protection Agency et al.*, 2007), gave the EPA the authority to regulate GHGs as air pollutants under the federal CAA.

#### EPA and NHTSA Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards (2010, 2012)

In May 2010 the EPA in conjunction with the Department of Transportation’s National Highway Traffic Safety Administration (NHTSA) finalized the Light Duty Vehicle Rule (LDVR) that establishes a national program consisting of GHG emissions standards and CAFE standards for light duty vehicles. LDVR standards first apply to new cars and trucks starting with model year 2012. Although the rule is designed to address GHG emissions, primarily, the fuel economy standards portion of the rule would serve to also reduce criteria pollutant emissions. On August 28, 2012, EPA and NHTSA extended the National Program of harmonized GHG and fuel economy standards to model year 2017 through 2025 passenger vehicles. The 2010 and 2012 rules affect passenger vehicles and other light duty vehicles.

#### Emission Standards for Medium and Heavy-Duty Vehicles (2015)

EPA and the NHTSA proposed rules for the second phase of fuel economy standards for medium and heavy-duty (HDVs) vehicles. The phase two standards call for an 8 to 24 percent increase in fuel efficiency, depending on the vehicle's size and purpose, between the years 2018 and 2027.

### **State Regulations and Agreements**

#### Assembly Bill 1493 – Vehicular Emissions of Greenhouse Gases (July 2002)

AB 1493 required the CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. Regulations adopted by the CARB apply to 2009 and later model year vehicles. The CARB estimated that the regulation will reduce climate change emissions from light duty passenger vehicle fleet by 18 percent in 2020 and 27 percent in 2030.

#### Governor's Executive Order S-3-05 (June 2005)

S-3-05 established GHG emission reduction targets as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. S-3-05 created the CAT, which develops assessment reports on climate change and adaptation options for California.

#### Governor's Executive Order B-30-15 (April 2015)

EO B-30-15 established a mid-term GHG reduction target for California of 40 percent below 1990 levels by 2030. EO B-30-15 requires state agencies to implement measures to achieve these targets and requires the development of a Scoping Plan that reflects these targets.

#### Assembly Bill 32 - California Global Warming Solutions Act of 2006 and Scoping Plan (September 2006), and Scoping Plan Update (2014)

The California Global Warming Solutions Act of 2006, widely known as AB 32, required CARB to develop and enforce regulations for the reporting and verification of statewide GHG emissions. CARB was directed to set a GHG emission limit, based on 1990 levels, to be achieved by 2020. The bill set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner. AB 32 also required CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions.

On December 11, 2008, CARB adopted the AB 32 Scoping Plan, which set forth the framework for facilitating the state's GHG goal as described in Executive Order S-3-05. On October 20, 2011, CARB adopted the final cap-and-trade regulation. As part of finalizing the regulation, CARB considered the related environmental analysis (i.e., functional equivalent document) and written responses to environmental comments. CARB also approved an adaptive management plan that will monitor progress of reductions and recommend corrective actions if progress is not as planned or there are unintended consequences in other environmental areas (e.g., concentration of local criteria pollutants). In 2014, CARB adopted an update to the 2008 Scoping Plan that builds upon the initial Scoping Plan with new strategies and recommendations. The 2008 Scoping Plan and 2014 Scoping Plan Update requires that reductions in GHG emissions come from virtually all sectors of the economy and be accomplished from a combination of policies, planning, direct regulations, market approaches, incentives and voluntary

efforts. These efforts target GHG emission reductions from cars and trucks, electricity production, fuels, and other sources.

California Solar Initiative and Senate Bill 1 (August 2006)

SB 1 directed the Public Utilities Commission and California Energy Commission to expand the California Solar Initiative Program to more customers and required the state's municipal utilities to create their own solar rebate programs. This bill required, beginning January 1, 2011, that a seller of new homes offer the option of a solar energy system to all customers negotiating to purchase a new home constructed on land meeting certain criteria and to disclose certain information.

Governor's Executive Order S-01-07 (January 2007) and Low Carbon Fuel Standards (LCFS) (approved April 2009, effective April 2010)

S-01-07 established the following: 1) a statewide goal to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020; and 2) a LCFS for transportation fuels. In 2009, CARB approved for adoption the LCFS regulation, which became fully effective in April 2010. The LCFS are intended to reduce GHG emissions by reducing the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "lifecycle" of a transportation fuel.

California Senate Bill 650 (2014)

SB 650 requires the state to develop a strategy to reduce emissions of short-lived climate pollutants (SLCPs). As a result of SB 605, the CARB released its proposed SLCP strategy in April 2016 that describes actions the State proposes to reduce emissions of SLCPs (CARB, 2016).

California Senate Bill 1383 (2016)

SB 1383 requires that by January 1, 2018, the CARB approve and implement a strategy to reduce statewide emissions of SLCP to achieve a reduction in emissions of methane by 40 percent, HFCs 40 percent and black carbon by 50 percent below 2013 levels by the year 2030.

Senate Bill 97 - CEQA Guidelines (August 2007)

SB 97 required that the California Natural Resources Agency coordinate the preparation of amendments to the CEQA Guidelines regarding feasible mitigation of GHG emissions or the effects of GHG emissions. Pursuant to SB 97, the agency adopted CEQA Guidelines amendments on December 30, 2009. The amendments were approved by the Office of Administrative Law on February 16, 2010, and became effective on March 18, 2010.

With respect to the significance assessment, CEQA Guidelines Section 15064.4, subdivision (b), indicates:

A lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- (1) The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;

- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project;
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. 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 GHG 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.

The CEQA Guidelines also apply retroactively to any incomplete EIR, Negative Declaration, Mitigated Negative Declaration, or other related documents. The amendments provide that lead agencies should consider all feasible means of mitigating GHG emissions that substantially reduce energy consumption or GHG emissions. If offsite or carbon offset mitigation measures are proposed, they must be part of reasonable plan of mitigation that the agency itself is committed to implementing. No threshold of significance or any specific mitigation measures are indicated in the Guidelines.

Among other things, the California Natural Resources Agency noted in its public notice for these changes that impacts of GHG emissions should be considered in the context of a cumulative impact, rather than a project impact. The public notice states:

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

Assembly Bill 1470 - Solar Hot Water and Efficiency Act (November 2007)

AB 1470 directed the California Energy Commission to establish a 10-year, statewide incentive program to encourage the installation of 500,000 solar water heating systems to offset natural gas usage for water and space heating. The incentives were to be funded by establishing a surcharge on certain natural gas customers.

Senate Bill 375 – Transportation planning: travel demand models: sustainable communities strategy: environmental review (September 2008)

SB 375 provided for a new planning process to coordinate land use planning and regional transportation plans and funding priorities to help California meet the GHG reduction goals established in AB 32. SB 375 required regional transportation plans, developed by Metropolitan Planning Organizations relevant to the proposed project area (including the SCAG), to incorporate a sustainable communities strategy in their regional transportation plans that will achieve GHG emission reduction targets set by CARB. SB 375 also included provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 will be implemented over the next several years.

SB 375 is similar to the Regional Blueprint Planning Program, established by the California Department of Transportation, which provides discretionary grants to fund regional transportation and land use plans voluntarily developed by Metropolitan Planning Organizations working in cooperation with Council of Governments. The scoping plan adopted by CARB in December of 2008 relies on the requirements of SB 375 to implement the carbon emissions reductions anticipated from land use decisions.

On April 4, 2012, SCAG adopted the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS): Towards a Sustainable Future. The RTP/SCS is the culmination of a multi-year effort involving stakeholders from across the SCAG Region (SCAG, 2012). The 2012–2035 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero emission transportation technologies in the 2023–2035 timeframe and clear steps to move toward this objective.

#### Governor’s Executive Order S-13-08 - California Climate Adaptation Strategy (November 2008)

S-13-08 directed state agencies to develop a strategy for identification and preparation for expected climate change impacts in California. The resulting 2009 California Climate Adaptation Strategy report presents best available science relevant to climate impacts in California and proposes a set of recommendations for California decision makers to assess vulnerability and promote resiliency to reduce California’s vulnerability to climate change. S-13-08 also ordered the creation of a comprehensive Sea Level Rise Assessment Report, which was completed by the National Academy of Science in 2012. Guidance regarding adaptation strategies is general in nature and emphasizes incorporation of strategies into existing planning policies and processes.

#### Senate Bill X7-7 - Water Conservation Act (November 2009)

The legislation set an overall goal of reducing per capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per capita water use by at least 10 percent by December 31, 2015. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.

#### Senate Bill X1-2 – Renewable Energy Resources (April 2011)

SB X1-2 directed California Public Utilities Commission's Renewable Energy Resources Program to increase the amount of electricity generated from eligible renewable energy resources per year to an amount that equals at least 20 percent of the total electricity sold to retail customers in California per year by December 31, 2013, 25 percent by December 31, 2016 and 33 percent by December 31, 2020. The new goals apply to all electricity retailers in the state. This new Renewable Portfolio Standard preempts the California Air Resources Boards' 33 percent Renewable Electricity Standard.

#### Title 24: Building Energy Efficiency Standards (Title 24, Part 6) and Green Building Code Standards (Title 24, Part 11)

Building Energy Efficiency Standards (Title 24, Part 6) for new residential and commercial buildings were originally adopted by the California Energy Resources Conservation and Development Commission in June 1977 and most recently revised in 2016. Title 24, Part 6 seeks to ensure that building construction,

system design, and installation achieve energy efficiency. Title 24, Part 6 establishes a minimum level of building energy efficiency.

The Green Building Code Standards (Title 24, Part 11) were adopted by the California Building Standards Commission in 2008, and most recently revised in 2016. Title 24, Part 11 seeks to enhance the design and construction of buildings by encouraging sustainable construction practices in planning/design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Title 24, Part 11 establishes mandatory minimum green building standards to the planning, design, operation, construction, use and occupancy of newly constructed, residential and nonresidential buildings.

### **Regional and Local Plans, Programs and Policies**

#### Southern California Association of Governments (SCAG) Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) (2016)

SCAG is the regional planning agency for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties, and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. The RTP serves as a long-range transportation plan that is developed and updated by SCAG every four years. The SCS expands upon transportation strategies in the RTP to analyze growth patterns and establish future land use strategies that aid the region in meeting its GHG reduction targets.

#### Lake Elsinore Climate Action Plan (2011) (Lake Elsinore, 2011)

The Climate Action Plan (CAP) is the City's plan to reduce local GHG emissions in accordance with State law. The CAP set efficiency-based targets for the years governed by the General Plan to reduce community-wide emissions to 6.6 MT CO<sub>2</sub>e per service population per year by 2020 (a 22.3% reduction from the 2008 rate of 8.5 MT CO<sub>2</sub>e/SP) and to 4.4 MT CO<sub>2</sub>e per service population per year by 2030 (a 48.2% reduction from the 2008 rate of 8.5 MT CO<sub>2</sub>e/SP). The City deems these targets to be consistent with AB 32.

To meet the emissions reduction targets, the CAP identifies the following key measures: transportation and land use, energy, solid waste, education and outreach, and state-level regulations. State level regulations include the Pavley Regulations, LCFS, heavy/medium duty and passenger vehicle efficiency regulations, and the Renewable Portfolio Standard.

The CAP is also intended to serve as the programmatic tiering document for the purposes of CEQA, within the City, for GHG emissions, by which applicable projects will be reviewed. If a proposed development project can demonstrate it is consistent with the applicable emissions reduction measures included in the CAP, the projects and standards that would be implemented as a result of the CAP, and the General Plan Update growth projections, the project's environmental review pertaining to GHG impacts may be streamlined as allowed by CEQA Guidelines Sections 15152 and 15183 (Lake Elsinore, 2011). For reasons discussed in Section 5.6.6.1, Assessment Methodology, the CAP was not used as a tiering document in this Study.

## 5.6.5 Thresholds of Significance

Per SCAQMD proposed guidance and State CEQA guidelines, Appendix G, the following thresholds are used in this analysis to assess the significance of proposed Project-related GHG impacts. The proposed Project would create a significant GHG impact under any of the following circumstances:

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

Applicable Threshold:

- The Project generates GHG emissions that, either directly or indirectly, exceed GHG per capita efficiency targets shown in Table 5.6-1;
- The Project results in a cumulatively considerable net increase if GHG emissions exceed the per capita efficiency targets shown in Table 5.6-1.

**Table 5.6-1. Greenhouse Gas Emissions Significance Threshold**

GHG Efficiency Targets <sup>1</sup>	
Year 2022	4.3 Mton/yr CO <sub>2</sub> e per SP
Year 2040	1.6 Mton/yr CO <sub>2</sub> e per SP
<p><b>Notes:</b>  <sup>1</sup> GHG efficiency targets were calculated based on statewide GHG reduction goals and statewide service population.            CO<sub>2</sub>e – CO<sub>2</sub> equivalent.            Mton/yr – metric tons per year.            SP – service population = residential population + employment population.            Source: Air Quality and Greenhouse Gas Analysis, iLanco, 2017.</p>	

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

## 5.6.6 Evaluation of Impacts

### 5.6.6.1 Assessment Methodology

CalEEMod was used to estimate existing baseline GHG emissions and future GHG emissions from operational activities. Skylark Airport emissions were calculated outside of CalEEMod, using activity provided by Skylark and emission factors from the Climate Action Registry. Construction emissions were analyzed qualitatively. In addition to the GHG emissions associated with direct sources, CalEEMod was also used to quantify indirect GHG emissions (i.e., emissions generated off-site as a result of the proposed Project). Indirect emissions quantified in CalEEMod include the following:

- Electricity and natural gas;

- Water conveyance and wastewater treatment; and
- Waste disposal.

Although the SCAQMD has established a bright line GHG threshold for industrial projects and has proposed a bright line threshold for residential/commercial projects, bright line thresholds have not been established for Specific Plan documents. CEQA allows projects to tier from an adopted CAP in evaluating GHG impacts. Although the City adopted the CAP in 2011, the CAP horizon year is 2030, whereas the Project buildout is 2040. For this reason, although an evaluation of the Project's consistency with the CAP is included, the CAP was not used as a tiering document.

Some air quality districts have either adopted (i.e., BAAQMD) or proposed (i.e., SCAQMD) GHG efficiency targets. The GHG efficiency metric divides annualized GHG emissions by the service population, which is the sum of residents and employees, per the following equation:

$$\text{Rate of Emission: } \text{GHG Emissions (mt) CO}_2\text{e} / \text{Service Population}$$

The efficiency evaluation consists of comparing the project's efficiency metric to efficiency targets. Efficiency targets represent the maximum quantity of emissions each resident and employee in the State of California could emit in various years based on emission levels necessary to achieve the statewide GHG emissions reduction goals. A project which results in a lower rate of emissions would be more efficient than a project with a higher rate of emissions, based on the same service population. The metric considers GHG reduction measures integrated into a project's design and operation (or through mitigation). The Project incorporates all applicable elements of the City CAP as project elements. Since adoption of the CAP, the City has achieved many of the CAP measures and has incorporated many into its ordinances and conditions of approval (Draft EIR Appendix E, Table 9). However, several CAP measures stipulate future compliance dates that have yet to be achieved. In particular, CAP measures E-1.3 and E-4.2 offer opportunity for mitigation. This EIR quantifies the following CAP measures as part of the proposed Project's design:

- CAP Measure E-1.3, Energy Efficient Building Standards. This measure requires all development projects, after 2020, to achieve 15% energy efficiency above Title 24.
- CAP Measure E-4.2, Indoor Water Conservation Requirements. This measure requires all development projects, after 2020, to reduce indoor water consumption by 30%.

Efficiency targets can change over time as new population projections are developed. Therefore, although several air quality districts have developed efficiency targets in the past, this analysis did not use previously developed efficiency targets but instead used updated efficiency targets based on the most recent service population projections available at the time of the GHG Study.

Table 5.6-2 shows the calculated GHG efficiency targets for several years. The 2022 milestone and 2040 build-out year efficiency targets were used in the analysis, and were interpolated from the 2020, 2030, and 2050 efficiency targets, which are associated with state GHG reduction goals. Since construction

emissions were not quantified for this programmatic effort, the statewide land use emissions and employment population were also adjusted to exclude construction.<sup>1</sup>

**Table 5.6-2. GHG Efficiency Targets**

	2020	2022	2030	2040	2050
California Adjusted Land Use Sector Emissions Target (MT CO <sub>2</sub> e)	266,549,666	245,225,693	159,929,800	106,619,866	53,309,933
California Projected Population	40,619,346	41,312,597	44,085,600	47,233,240	49,779,362
California Projected Adjusted Employment	14,987,000	15,302,000	16,580,000	18,141,000	19,803,000
California Projected Service Population (Population + Employment)	55,606,346	56,614,597	60,665,600	65,374,240	69,582,362
Target Efficiency Metric (MT CO <sub>2</sub> e/SP)	4.8	4.3	2.6	1.6	0.8
<p><b>Notes:</b>            2020 target efficiency reflects the California AB 32 goal of achieving 1990 emissions by 2020.            2030 target efficiency reflects the California B-30-15 goal of achieving 40% below 1990 emissions by 2030.            2050 target efficiency reflects the California EO-S-03-05 goal of achieving 80% below 1990 emissions by 2050.            2022 and 2040 target efficiencies for the proposed Project were interpolated from the 2020, 2030, and 2050 target efficiencies.            Adjusted land use emissions exclude construction and are adjusted for regulatory requirements (AEP, 2016).            Adjusted employment excludes farm, construction, and manufacturing sectors.</p> <p><b>Sources:</b>            Air Quality and Greenhouse Gas Analysis, iLanco, 2017            GHG Emissions from:            ARB 1990 GHG Emissions Inventory. <i>Inventory Query Tool</i>. Available: <a href="https://www.arb.ca.gov/cc/inventory/inventory.htm">https://www.arb.ca.gov/cc/inventory/inventory.htm</a>            AEP 2016. Association of Environmental Professionals. Draft White Paper. Beyond 2020 and Newhall. Table T-1, Adjusted Statewide 1990 Land Use Sector Emissions Inventory 1 (MMT CO<sub>2</sub>e/yr) and Table T-2, Example 2020, 2030 and 2050 GHG Efficiency Metrics for the Land Use Sector. April 2016.            Population from:            California Department of Finance. 2014. Report P1: State and County Population Projections. December. Available: <a href="http://www.dof.ca.gov/Forecasting/Demographics/projections/">http://www.dof.ca.gov/Forecasting/Demographics/projections/</a>            Employment from:            California Economic Forecast. 2016. California County-Level Economic Forecast 2016-2040. Prepared for Caltrans Economic Analysis Branch. October. Available: <a href="http://www.dot.ca.gov/hq/tpp/offices/eab/index_files/2016/FullReport2016.pdf">http://www.dot.ca.gov/hq/tpp/offices/eab/index_files/2016/FullReport2016.pdf</a></p>					

Project GHG efficiency was quantified for the 2022 milestone and 2040 buildout years by dividing the Project GHG emissions by the service population associated with the Project. Project GHG emissions were calculated using CalEEMod, as described in this section, above. The service population associated with the proposed Project was determined by combining the Project's residential population and the employment population. The Project's residential population was calculated in CalEEMod. The Project's employment population was calculated using employment land use numbers from the County of Riverside's General Plan (Riverside, 2015).

<sup>1</sup> GHG emissions associated with construction activities are typically much lower than GHG emissions associated with operational activities. Typically, GHG construction emissions would be less than 5 percent of total GHG emissions.

**5.6.6.2 Impact Analysis**

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

**GHG Emissions**

GHG emissions, associated with the proposed Project land uses, would occur from future direct sources such as the use of mobile vehicles by residents, employees and visitors; and area sources such as hearths, consumer products, architectural coatings, and landscape equipment. GHG emissions would also occur from future indirect sources, such as the use of electricity and natural gas, water conveyance and wastewater treatment, and waste disposal.

Operational emissions and residential population were quantified based on land use type and land use activity, provided by the City. Employment population for nonresidential land uses was obtained from the County of Riverside General Plan (Riverside, 2015). The following City CAP measures were quantified as part of the proposed Project’s design:

- CAP Measure E-1.3, Energy Efficient Building Standards. This measure requires all development projects, after 2020, to achieve 15% energy efficiency above Title 24;
- CAP Measure E-4.2, Indoor Water Conservation Requirements. This measure requires all development projects, after 2020, to reduce indoor water consumption by 30%.

Table 5.6-3 summarizes unmitigated GHG emissions associated with operation of the proposed Project and shows that GHG emissions would result mainly from the future use of mobile vehicles. Table 5.6-3 also compares the proposed Project efficiency to the target efficiency, and shows that Project GHG emissions would be greater than the target emissions per service population both in 2022 and 2040.

**Table 5.6-3. Annual GHG Emissions Without Mitigation - Proposed Project**

Source Category	CO2 (mton/yr)	CH4 (mton/yr)	N2O (mton/yr)	CO2e (mton/yr)
<b>Baseline 2016</b>				
Area Emissions	404	0	0	417
Energy Emissions	21,394	1	0	21,489
Mobile Emissions	70,620	5	-	70,740
Waste Disposal Emissions	3,957	234	-	9,803
Water Purveying Emissions	3,241	9	0	3,532
Skylark Airport Emissions	1,836			1,836
CEQA Baseline	101,453	249	1	107,818
<b>Operating Year 2022</b>				
Area Emissions	954	1	0	984
Energy Emissions	53,247	2	1	53,481
Mobile Emissions	141,510	7	-	141,689
Waste Emissions	8,615	509	-	21,345

Source Category	CO2 (mton/yr)	CH4 (mton/yr)	N2O (mton/yr)	CO2e (mton/yr)
Water Purveying Emissions	5,642	15	0	6,136
Skylark Airport Emissions	1,836			1,836
Total	211,805	534	1	225,471
Project Minus CEQA Baseline	110,352	285	1	117,653
Project Population				8,337
Project Employment Population				307
Project Service Population				8,644
<i>Project Efficiency Metric (Mton CO2e/SP)</i>				13.6
<i>Target Efficiency Metric (Mton CO2e/SP)</i>				4.3
<b>Operating Year 2040</b>				
Area Emissions	1,191	1	0	1,229
Energy Emissions	70,792	2	1	71,102
Mobile Emissions	154,046	6	-	154,196
Waste Emissions	10,613	627	-	26,292
Water Purveying Emissions	7,015	20	1	7,666
Skylark Airport Emissions	1,836			1,836
Total	245,494	657	1	262,323
Project Minus CEQA Baseline	144,041	408	1	154,505
Project Population				10,410
Project Employment Population				1,350
Project Service Population				11,760
<i>Project Efficiency Metric (Mton CO2e/SP)</i>				13.1
<i>Target Efficiency Metric (Mton CO2e/SP)</i>				1.6
<b>Notes:</b>				
Emissions might not add precisely due to rounding.				
Emissions reflect City CAP measures E-1.3 and E-4.2.				
The following operating emissions were calculated using CalEEMod:				
Area emissions reflect emissions associated with the use of hearths, consumer products, architectural coatings, and landscape equipment.				
Energy emissions reflect emissions associated with energy use of electricity and natural gas.				
Mobile emissions reflect emissions associated with mobile vehicle exhaust and entrained road dust.				
Waste emissions reflect emissions associated with solid waste disposal.				
Water purveying emissions reflect emissions associated with purveying and treatment of water and wastewater.				
Skylark Airport emissions were calculated outside of CalEEMod, using activity provided by Skylark and emission factors from The Climate Registry 2015 Default Emission Factors.				
GHG target efficiency was calculated based on state GHG reduction goals and service population.				
Project efficiency metric was calculated based on project GHG emissions and project service population).				
Source: Air Quality and Greenhouse Gas Analysis (iLanco, 2015).				

Construction emissions were not quantified, as discussed in Section 5.6.6.1, to avoid speculating on the unknown nature of future construction activities; however, future construction within the Project site would be expected to generate a relatively small amount of the Project's total future GHG emissions

(approximately 5% or less) compared to the operational phase emissions, quantified above in Table 5.6-3. This approximate 5% increase would be in addition to those presented in Table 5.6-3<sup>2</sup>.

As shown above in Table 5.6-3, the Project would exceed the target efficiency metric by 9.3 Mton CO<sub>2</sub>e/SP in the year 2022 and by 11.5 Mton CO<sub>2</sub>e/SP in the year 2040. It should be noted; this analysis represents a worst-case scenario as it does not discount the increased GHG emissions that would result from ambient traffic growth and future development that could occur without the proposed Project under the existing approved specific plan. Based on this conservative analysis, the proposed Project would result in significant unavoidable increased GHG emissions from future operations and construction. Compliance with the ELSPA No. 11 Section 9 Sustainability Plan as well as implementation of mitigation measures **MM AQ-1** and **MM AQ-3** through **MM AQ-5**, listed in Section 5.2.9, and **MM GHG-1** would be required for future implementing development projects to reduce such GHG impacts generated during construction and operations; **however, it cannot be guaranteed at this time that such measures would reduce impacts to less than significant.**

**Impact GHG-1** *The Project would allow for new development at the Project site, ultimately resulting in a future operational phase that may exceed the GHG target efficiency metric by approximately 9.3 Mton CO<sub>2</sub>e/SP in the year 2022 and by 11.5 Mton CO<sub>2</sub>e/SP in the year 2040. Future construction would also increase GHG emissions by an additional approximately 5% of the total estimated operational phase emissions, which may contribute to an exceedance of the target efficiency metric.*

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

#### **Plan Consistency**

In 2006, California adopted AB 32, which requires the state to reduce statewide GHG emissions to 1990 levels by 2020, a reduction target that was introduced in EO S-3-05. In 2016, California adopted SB 32, which requires the state to reduce statewide GHG emissions to 40% below 1990 levels by 2030, a reduction target that was introduced in EO B-30-15. Section 5.6.4, presents a discussion of EO S-3-05, EO B-30-15, AB 32, and SB 32.

AB 32 and SB 32 codified state targets and directed State regulatory agencies to develop rules and regulations to meet the targets; AB 32 and SB 32 do not stipulate project-specific requirements. Specific

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<sup>2</sup> GHG emissions associated with construction activities are typically much lower than GHG emissions associated with operational activities. Typically, GHG construction emissions would be less than 5 percent of total GHG emissions. The approximate 5 percent or less estimate cited here and in Appendix E (Air Quality and Greenhouse Gas Analysis) is based on three other analyses prepared by iLanco Environmental, LLC for residential and commercial developments within the past 5 years; and is provided for informational purposes only and is not used for determination of significance. Construction GHG emissions as a percentage of these projects' total emissions equaled 3 percent, 1 percent and 1 percent. The project exhibiting the highest percentage of GHG emissions at 3 percent was mainly attributed to the intensity of site preparation required, which included demolition, onsite-crushing, import of fill, soil remediation of existing unstable fill, and mass hillside grading

requirements are codified in rules and regulations developed by regulatory agencies such as CARB and SCAQMD, and local City actions such as the City of Lake Elsinore CAP.

The City’s CAP, adopted in 2011, certified that the City’s target is consistent with AB 32’s 2020 goals. The City CAP ensures that the City will be providing local GHG reductions that will complement state efforts to reduce GHG emissions to the AB 32 target. The proposed Project would not conflict with the applicable CAP reduction measures, as shown in Table 5.6-4. In addition to CAP requirements, Table 5.6-4 also discusses other related and applicable plans and policies to the proposed Project.

The City’s CAP was developed prior to SB 32. Therefore, although the City’s CAP was developed with a horizon year of 2030, the CAP does not provide assurance that the City will provide local GHG reductions that will complement state SB 32 efforts through 2030. In addition, the CAP does not address targets past 2030. Notwithstanding, it should be noted that the reliance on CAP measures would not end in 2030 and continuation of these measures would continue to provide GHG reductions to new developments that occur after 2030. **Therefore, the proposed Project would not conflict with an applicable plan, policy or regulation as shown in Table 5.6-4 and no mitigation would be required.**

**Table 5.6-4. Evaluation of Plans, Policies or Regulations Adopted for GHG Reduction**

Plan, Policy, Regulation	Applicability to Proposed Project	Consistency Analysis
<b>AB 32 2008 Scoping Plan, and 2014 Scoping Plan Update</b>		
<p>The AB32 2008 Scoping Plan set a Statewide roadmap for achieving the following AB 32 State targets: (1) Year 2000 levels by 2010; and (2) Year 1990 levels by 2020.</p> <p>The 2014 AB32 Scoping Plan Update build upon the 2008 Scoping Plan with new strategies to achieve the following AB32 State target: Year 1990 levels by 2020.</p> <p>ARB released a draft 2030 Target Scoping Plan in April 2016, and is expecting a final version go to its board in 2017.</p>	<p>The Scoping Plan and Plan Update include general recommendations to reduce GHG emissions. Not directly applicable to the proposed Project.</p>	<p>The AB 32 2008 Scoping Plan outlines the State’s strategy to achieve the 2020 GHG emission reduction target via a set of recommended measures. The implementation of these measures relies on actions on the part of state agencies and local governments, not individual projects. Actions include, but are not limited to, development and implementation of rules, market projects, zero-emission projects, renewable fuel standards, LCFS, vehicle efficiency measures, energy efficiency projects, green building strategies, market-based mechanisms, incentive measures, as well as land use planning and permitting. The Scoping Plan’s reduction actions do not identify specific project-level measures. No elements of the proposed Project would conflict with the Scoping Plans.</p> <p>The AB 32 2014 Scoping Plan Update builds upon the 2008 Scoping Plan with additional strategies and recommendations. In the 2014 AB 32 Scoping Plan Update, ARB identified that the State had adopted sufficient laws and regulations to achieve the AB 32 2020 target. Therefore, projects that comply with regulations are also consistent with AB 32.</p> <p>The proposed Project analysis has quantified GHG impacts for 2022 and 2040. The proposed Project would comply with existing regulations, applicable to project activities, and would, by law, comply with future regulatory requirements, applicable to project activities, developed as part of the Scoping Plan. The proposed</p>

Plan, Policy, Regulation	Applicability to Proposed Project	Consistency Analysis
		Project would therefore, not preclude the State’s implementation of the AB 32 Scoping Plan or Plan Update.
<b>CCR Title 24, Part 6 – Building Energy Efficiency Standards</b>		
	Applicable	<p>The Building Energy Efficiency Standards for new residential and commercial buildings seek to ensure that building construction, system design, and installation achieve energy efficiency.</p> <p>The proposed Project would not conflict with the Building Energy Efficiency Standards, pursuant to the City’s Municipal Code and as part of the conditions set forth in the building permit. The Building Energy Efficiency Standards are also subsumed in the City’s CAP, Measure E-1-3.</p>
<b>CCR Title 24, Part 11 – Green Building Code Standards</b>		
	Applicable	<p>The Green Building Code Standards were developed in response to AB 32. The Standards establish mandatory green building construction standards.</p> <p>The proposed Project would not conflict with the Green Building Code Standards, pursuant to the City’s Municipal Code and as part of the conditions set forth in the building permit. The Green Building Code Standards are subsumed in the City’s CAP, Measure E-1.3.</p>
<i>City of Lake Elsinore 2011 CAP</i>		
<b>Transportation and Land Use Measures</b>		
Measure T-1.2: Pedestrian Infrastructure	Applicable	<p>This measure requires the installation of sidewalks along new and reconstructed streets and sidewalks or paths to internally link all uses and provide connections to neighborhood activity centers, major destinations, and transit facilities contiguous with the project site. This measure is implemented by the Department of Public Works and Building Department through policy development, development review, and conditions of approval. The proposed Project elements would be required to comply with conditions of approval imposed by the City. As such, the proposed Project would not conflict with this measure.</p>
Measure T-1.4: Bicycle Infrastructure	Applicable	<p>This measure requires new development to implement and connect to the network of Class I, II and III bikeways, trails and safety features identified in the General Plan, Bike Lane Master Plan, Trails Master Plan and Western Riverside County Non-Motorized Transportation plan. This measure is implemented by the Department of Public Works, Community Services Department, and Building Department through policy development, development review, and conditions of approval. The proposed Project elements would be required to comply with conditions of approval imposed by the City. As such, the proposed</p>

Plan, Policy, Regulation	Applicability to Proposed Project	Consistency Analysis
		Project would not conflict with this measure.
Measure T-1.5: Bicycle Parking Standards	Applicable	This measure requires the City to enforce short-term and long-term bicycle parking standards for new non-residential developments. This measure is implemented by the Department of Public Works and Building Department through development review and conditions of approval. The proposed Project elements would be required to comply with conditions of approval imposed by the City. As such, the proposed Project would not conflict with this measure.
Measure T-2.1: Designated Parking for Fuel-Efficient Vehicles	Applicable	This measure requires new non-residential developments to designate 10% of total parking spaces for low-emitting, fuel-efficient vehicles. This measure is implemented by the Department of Planning, Public Works and Building through development review and conditions of approval. The proposed Project elements would be required to comply with conditions of approval imposed by the City. As such, the proposed Project would not conflict with this measure.
Measure T-4.1: Commute Trip Reduction Program	Applicable	This measure requires the City to institute a commute trip reduction program for employers with fewer than 100 employees. This measure is implemented by the Department of Planning through amendment to the Municipal Code. ELSPA 11 would be comprised of various project-specific actions, some of which may be subject to this measure. The proposed Project elements would be required to comply with the City's Municipal Code. As such, the proposed Project would not conflict with this measure.
<b>Energy Measures</b>		
Measure E-1.1: Tree Planting Requirements	Applicable	This measure requires new developments to plant at minimum one 15-gallon nondeciduous, umbrella-form tree per 30 linear feet of boundary length near buildings. This measure is implemented by the Departments of Planning, Public Works, and Parks and Recreation through City ordinance, development review process, and conditions of approval. The proposed Project elements would be required to comply with the City ordinances and conditions of approval. As such, the proposed Project would not conflict with this measure.
Measure E-1.2: Cool Roof Requirements	Applicable	This measure requires new non-residential development to use roofing materials having solar reflectance, thermal emittance or Solar Reflectance Index consistent with CalGreen Tier 1 values. This measure is implemented by the Departments of Planning and Building through City ordinance, development review process, and conditions of approval. The proposed Project elements would be required to comply with the City ordinances and conditions of approval. As such, the proposed Project would not conflict with this measure.
Measure E-1.3: Energy	Applicable	This measure requires that new construction exceed the

Plan, Policy, Regulation	Applicability to Proposed Project	Consistency Analysis
Efficient Building Standards		California Energy Code requirements, based on the 2008 Energy Efficiency Standards by 15% by 2020, through either the performance based or prescriptive approach described in the California Green Building Code. This measure is implemented by the Departments of Planning, Public Works, and Building through City ordinance, development review process, and conditions of approval. The proposed Project elements would be required to comply with the City ordinances and conditions of approval. As such, the proposed Project would not conflict with this measure. The proposed Project was analyzed with this measure.
Measure E-3.2: Energy Efficient Street and Traffic Signal Lights	Applicable	<p>This measure requires the City to work with Southern California Edison to replace existing high pressure sodium street lights and traffic lights with high efficiency alternatives, such as Low Emitting Diode (LED) lights; replace existing City owned traffic lights with LED lights; require any new street and traffic lights to be LED. This measure is currently being implemented by the Department of Public Works through renovation. The Planning Department obtains compliance through Municipal Code amendment, the development and review process, and conditions of approval.</p> <p>This measure would apply to any traffic lights replaced or installed as part of ELSPA 11. The proposed Project elements would be required to comply with the municipal code and conditions of approval. As such, the proposed Project would not conflict with this measure.</p>
Measure E-4.1: Landscaping Ordinance	Applicable	This measure requires the City to enforce the City’s AB 1881 Landscaping Ordinance, which requires that landscaping be water efficient, thereby consuming less energy and reducing emissions. This measure is implemented by the Departments of Building and Planning through City ordinance, development and review process, and conditions of approval. The proposed Project elements would be required to comply with these landscape requirements. As such, the proposed Project would not conflict with this measure.
Measure E-4.2: Indoor Water Conservation Requirements	Applicable	This measure requires that development projects reduce indoor water consumption by 30% by 2020. This measure is implemented by the Departments of Building and Planning through amendments to the Municipal Code and conditions of approval. The proposed Project elements would be required to comply with the City’s Municipal Code and conditions of approval. As such, the proposed Project would not conflict with this measure. The proposed Project was analyzed with this measure, and no conflicts were identified.
Measure E-5.1: Renewable Energy Incentives	Applicable	This measure facilitates the voluntary installation of small-scale renewable energy systems, such as solar photovoltaic and solar hot water systems, by connecting residents and businesses with technical and financial assistance through the City website.

Plan, Policy, Regulation	Applicability to Proposed Project	Consistency Analysis
		This measure is implemented by the Departments of Building and Planning through outreach and incentive programs. No elements of the proposed Project would conflict with this measure.
<b>Solid Waste Measures</b>		
Measure S-1.4: Construction and Demolition Waste Diversion	Applicable	This measure requires development projects to divert, recycle or salvage at least 65% of nonhazardous construction and demolition debris generated at the site by 2020 and requires all construction and demolition projects to be accompanied by a waste management plan for the project. This measure is implemented by the Departments of Planning and Building through City contracts, Municipal Code amendments, development and review process, and conditions of approval. The proposed Project project-specific elements would be required to comply with the City’s Municipal Code and conditions of approval. As such, the proposed Project would not conflict with this measure.
Source: Air Quality and Greenhouse Gas Analysis (iLanco, 2015).		

### 5.6.7 General Plan Consistency Impacts

The City of Lake Elsinore Community Development Element includes various policies related to greenhouse gasses. The applicable policies within this section and project analysis are discussed in Table 5.6-5.

**Table 5.6-5. Sustainable Development Consistency Analysis**

Goal/Policy #	Goal/Policy Text	Consistency Analysis
RP Goal 14	Reduce greenhouse gas emissions from all activities within the City boundaries to support the State’s efforts under AB-32 and to mitigate the impact of climate change on the City, State, and world.	<b>CONSISTENT.</b> The ELSP development standards include energy conservation guidelines that would improve energy efficiency in the Project’s development, which would also result in fewer greenhouse gases emissions.

Based on the analysis provided in Table 5.6-5., ***the Project is consistent with the General Plan and no additional mitigation is required.***

### 5.6.8 Cumulative Impacts

GHG impacts in relation to global climate change are, by nature, cumulative impacts; therefore, there is no separate cumulative impacts analysis for GHGs.

The challenge in assessing the significance of an individual project's contribution to global GHG emissions and associated global climate change impacts is to determine whether a project's GHG emissions, which are at a micro-scale relative to global emissions, make a cumulatively considerable incremental contribution to a macro-scale impact. For the purposes of this cumulative discussion, it is assumed that an exceedance of the project-level threshold could result in a cumulatively considerable contribution to the overall GHG burden.

As described above, construction and operation impacts of the proposed Project would exceed the GHG target efficiency metric by approximately 9.3 Mton CO<sub>2</sub>e/SP in the year 2022 and by 11.5 Mton CO<sub>2</sub>e/SP in the year 2040. Future construction would also increase GHG emissions by an additional approximately 5% of the total estimated operational phase emissions. Therefore, impacts from proposed Project construction and operation would result in a cumulatively considerable contribution to an existing significant cumulative impact related to GHG and global climate change under CEQA. ***Impacts would be potentially significant and unavoidable as described in Section 5.6.6.***

### 5.6.9 Impacts and Mitigation Measures

***Impact GHG-1*** *The Project would allow for new development at the Project site, ultimately resulting in a future operational phase that may exceed the GHG target efficiency metric by approximately 9.3 Mton CO<sub>2</sub>e/SP in the year 2022 and by 11.5 Mton CO<sub>2</sub>e/SP in the year 2040. Future construction would also increase GHG emissions by an additional approximately 5% of the total estimated operational phase emissions, which may contribute to an exceedance of the target efficiency metric.*

**MM GHG-1** Prior to issuance of a building permit for new implementing development projects within the East Lake Specific Plan, the applicant shall be required to demonstrate compliance with the City of Lake Elsinore's 2011 Climate Action Plan measures as follows:

1. CAP Measure E-1.3, Energy Efficient Building Standards requires all development projects, after 2020, to achieve 15% energy efficiency above Title 24. Exceedance shall achieve 15% energy efficiency above Title 24 for projects after 2018 and 25% energy efficiency above Title 24 for projects after 2020.
2. CAP Measure E-4.2, Indoor Water Conservation Requirements requires all development projects, after 2020, to reduce indoor water consumption by 30%. Exceedance shall reduce indoor water consumption by 30% for projects after 2018 and 35% for projects after 2020.

Mitigation measure MM GHG-1 accelerates compliance with CAP Measures E-1.3 and E-4.2 and exceeds the reduction goals stipulated in these CAP measures. Benefits associated with MM GHG-1 are not quantified in the analysis because evaluation of specific mitigation measures would be speculative at the programmatic level. Mitigation measures and impacts following mitigation should be evaluated once project-specific construction information is available.

In addition, implementation of required mitigation measures **MM AQ-1**, and **MM AQ-3** through **MM AQ-5** listed in Section 5.2.9 would reduce GHG emissions during future construction and operations at the Project site as a co-benefit to these measure's intended air quality emission reductions.

#### **5.6.10 Level of Significance after Mitigation**

Compliance with the ELSPA No. 11 Section 9 Sustainability Plan as well as implementation of mitigation measures **MM AQ-1** and **MM AQ-3** through **MM AQ-5**, listed in Section 5.2.9, and **MM GHG-1** would be required for future implementing development projects to reduce GHG impacts generated during construction and operations; ***however, it cannot be guaranteed at this time that such measures would reduce impacts to less than significant. Therefore, impacts would be potentially significant and unavoidable.***

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