Section 3.7
Greenhouse Gas Emissions

3.7.1 Introduction

This section describes the geographic and regulatory setting for greenhouse gas (GHG) emissions, discusses GHG impacts that would result from the *2020 LA River Master Plan* and its elements, determines the significance of impacts, and identifies mitigation measures that would reduce or avoid significant impacts, where feasible.

GHG emissions refer to airborne pollutants that affect global climate conditions. These gaseous pollutants have the effect of trapping heat in the atmosphere, and consequently altering weather patterns and climatic conditions over long timescales. Consequently, unlike other resource areas that are primarily concerned with localized project impacts (e.g., within 1,000 feet of a project area), the global nature of climate change requires a broader analytic approach. Accordingly, whereas the GHG analysis focuses on emissions generated from activities in the project area, the climate change study area includes the global context. Section 3.2, *Air Quality*, analyzes criteria pollutants and air quality.

The analysis in this section includes impact determinations under CEQA for the *2020 LA River Master Plan* that are applicable to all 18 jurisdictions in the study area, including the County and non-County jurisdictions (17 cities). Except for significant and unavoidable impacts, all identified significant environmental effects of the proposed *2020 LA River Master Plan* can be avoided or reduced to a less-than-significant level if the mitigation measures identified in this PEIR are implemented. These mitigation measures will be implemented for subsequent projects that are carried out by the County. Because some later activities under the *2020 LA River Master Plan* would not be carried out by the County, the County cannot enforce or guarantee that the mitigation measures would be incorporated. Therefore, where this PEIR concludes a less-than-significant impact for later activities carried out by the County, the impact would be significant and unavoidable when these activities are not carried out by the County.

3.7.2 Setting

3.7.2.1 Geographic

Global Climate Change

The process known as the greenhouse effect keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight striking Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, some of which is re-emitted back toward the surface by GHGs. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thus enhancing the greenhouse effect and amplifying the warming of Earth.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution (IPCC 2018). Rising atmospheric concentrations of GHGs in excess of natural levels result in increasing global surface temperatures—a phenomenon commonly referred to as global warming. Higher global surface temperatures, in turn, result in changes to Earth's climate system, including increased ocean temperature and acidity, reduced sea ice, variable precipitation, and increased frequency and intensity of extreme weather events (IPCC 2018). Large-scale changes to Earth's system are collectively referred to as climate change.

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. IPCC estimates that human-induced warming reached approximately 1 degree Celsius (°C) above pre-industrial levels in 2017, increasing at 0.2°C per decade. Under the current nationally determined contributions of mitigation from each country until 2030, global warming is expected to rise to 3°C by 2100, with warming to continue afterward (IPCC 2018). Even small, incremental increases in global temperatures could have substantial adverse effects on the natural and human environments worldwide and in California.

Potential Climate Change Effects

Climate change is a complex process that has the potential to alter local climatic patterns and meteorology. Although modeling indicates that climate change will result in sea level rise (both globally and regionally) as well as changes in climate and rainfall, among other effects, there remains uncertainty about characterizing precise local climate characteristics and predicting accurately how various ecological and social systems will react to any changes in the existing climate at the local level. Regardless of this uncertainty, it is widely understood that substantial climate change is expected to occur in the future, although the precise extent will take further research to define. Specifically, predicted adverse effects of global climate change worldwide and in California include:

- Declining sea ice and mountain snowpack levels, resulting in increasing sea levels and sea surface evaporation rates with a corresponding increase in atmospheric water vapor, due to the atmosphere's ability to hold more water vapor at higher temperatures (CNRA 2018)
- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets (IPCC 2018)
- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones (IPCC 2018)
- Declining Sierra Nevada Mountains snowpack levels, which account for approximately half of the surface water storage in California, by 70 percent to as much as 90 percent over the next 100 years (CNRA 2018)
- Increase in the number of days conducive to ozone formation (e.g., clear days with intense sun light) by 25 percent to 85 percent (depending on the future temperature scenario) by the end of the 21st century in high ozone areas, including Southern California (CNRA 2018)

- Increasing potential for erosion of California's coastlines and seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level (CNRA 2018)
- Exacerbated severity of drought conditions in California such that durations and intensities are amplified, ultimately increasing the risk of wildfires and consequential damage incurred (CNRA 2018)
- Agriculture experiencing lower crop yields due to extreme heat waves, heat stress and increased water needs of crops and livestock (particularly during dry and warm years), and new and changing pest and disease threats (CNRA 2018)

The impacts of climate change, such as increased heat-related events, droughts, and wildfires, pose direct and indirect risks to public health, as people will experience earlier death and worsening illnesses. Indirect impacts on public health include increased vector-borne diseases, stress and mental trauma due to extreme events and disasters, economic disruptions, and residential displacement (CNRA 2018).

Greenhouse Gases

The principal anthropogenic (human-made) GHGs listed by IPCC that contribute to global warming are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds, including sulfur hexafluoride (SF_6), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs). Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic sources. California law and the State CEQA Guidelines contain a similar definition of GHGs (Health and Safety Code Section 38505(g); 14 CCR Section 15364.5).

The primary GHGs of concern associated with the proposed Project are CO_2, CH_4, and N_2O. Principal characteristics of these pollutants are discussed below.

- **Carbon dioxide** enters the atmosphere through fossil fuels (oil, natural gas, and coal) combustion, solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., manufacture of cement). CO_2 is also removed from the atmosphere (or *sequestered*) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane** is emitted during the production and transport of coal, natural gas, and oil. CH_4 emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal solid waste landfills.
- **Nitrous oxide** is emitted during agricultural and industrial activities, as well as during combustion of fossil fuels and solid waste.

Methods have been set forth to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method to compare GHG emissions is the global warming potential (GWP) methodology defined in IPCC reference documents. IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO_2e), which compares the gas in question to that of the same mass of CO_2 (CO_2 has a global warming potential of 1 by definition). The GWP values used in this report are based on the IPCC Fourth Assessment Report and United Nations Framework Convention on Climate Change reporting guidelines. The Fourth Assessment Report GWP values are consistent with those used in the California Air Resources Board's (CARB's) most recent GHG inventory (CARB 2020a) and *California's 2017 Climate Change Scoping Plan* (2017 Scoping Plan) (CARB 2017a).

Table 3.7-1 lists the global warming potential of CO_2, CH_4, and N_2O and their lifetimes in the atmosphere.

Table 3.7-1. Lifetimes and Global Warming Potential of Key Greenhouse Gases

Greenhouse Gas	Global Warming Potential (100 years)	Lifetime (years)[a]
CO_2	1	-[b]
CH_4	25	9–15
N_2O	298	121

Source: CARB 2020a.

[a] Defined as the half-life of the gas.

[b] CARB has not identified a lifetime for CO_2.

All GWPs used for CARB's GHG inventory and to assess attainment of the State's 2020 and 2030 reduction targets are considered over a 100-year timeframe (as shown in Table 3.7-1). However, CARB recognizes the importance of short-lived climate pollutants (SLCPs) and reducing these emissions to achieve the State's overall climate change goals. SLCPs have atmospheric lifetimes on the order of a few days to a few decades, and their relative climate-forcing impacts, when measured in terms of how they heat the atmosphere, can be tens, hundreds, or even thousands of times greater than that of CO_2 (CARB 2017b). Recognizing their short-term lifespan and warming impact, SLCPs are measured in terms of CO_2e using a 20-year time period. The use of GWPs with a time horizon of 20 years better captures the importance of the SLCPs and gives a better perspective on the speed at which SLCP emission controls will affect the atmosphere relative to CO_2 emission controls. The SLCP Reduction Strategy, which is discussed under Section 3.7.2.2, *Regulatory*, addresses the three primary SLCPs—CH_4, HFC gases, and anthropogenic black carbon. CH_4 has lifetime of 12 years and a 20-year GWP of 72. HFC gases, which would not be generated by the proposed Project, have lifetimes of 1.4 to 52 years and a 20-year GWP of 437 to 6,350. Anthropogenic black carbon has a lifetime of a few days to weeks and a 20-year GWP of 3,200 (CARB 2017b).

Statewide Greenhouse Gas Emissions Trends

A GHG inventory is a quantification of all GHG emissions and sinks[1] within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a building or person). Although many processes are difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources.

CARB has prepared a statewide emissions inventory covering 2000 to 2017, which demonstrates that GHG emissions have decreased by approximately 10 percent over that period (CARB 2019a). The largest reductions in GHG emissions have come from the electricity sector, which continues to decrease as a result of the State's climate policies that has led to a growth in wind generation and solar power. Emissions in 2017 from the transportation sector, which represents California's largest source of GHG emissions and contributed 40 percent of total annual emissions, increased by 1 percent from 2016. Table 3.7-2 shows statewide GHG emission estimates from 2007 to 2017 in California. Note that the 2020 target (1990 levels) is 426.6 million metric tons of CO_2e ($MMTCO_2e$) while the 2030 target (40 percent below 1990 levels) is currently set at 260 $MMTCO_2e$ (CARB 2017a).

[1] A GHG sink is a process, activity, or mechanism that removes a GHG from the atmosphere.

Table 3.7-2. California Greenhouse Gas Emissions Inventory 2007–2017

Sector	Annual CO_2e Emissions (million metric tons)										
	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Transportation	189	189	177	170	165	162	161	161	163	166	169
Industrial	93	90	91	88	92	90	91	94	94	92	90
Electric Power	105	114	120	101	90	88	96	89	89	84	69
Commercial/Residential	44	44	44	45	46	46	44	44	38	39	41
Agriculture	35	35	35	33	34	34	36	34	35	34	34
High Global Warming Potential	10	11	12	12	14	15	16	17	18	19	19
Recycling and Waste	8	8	8	8	8	9	9	9	9	9	9
Emissions Total	491	487	457	449	444	451	448	445	441	429	424

Source: CARB 2019b.
Totals may not add exactly due to rounding.

Table 3.7-3 outlines the most recent city and County GHG inventories (where available) to help contextualize the magnitude of potential project-related emissions. There is no GHG inventory specifically for the study area. Mobile sources (e.g., vehicle trips) generate the largest amounts of GHG emissions in the study area. Other smaller sources of GHG emissions in the study area include those from industrial processes and electricity consumption.

Table 3.7-3. Local Greenhouse Gas Emissions (metric tons per year)

Emissions Inventory	CO_2e (rounded)
2017 City of Los Angeles	27,500,000
2015 City of Long Beach	3,100,468
2012 City of Carson	2,136,321
2010 Unincorporated County Areas	7,900,000
2010 City of Burbank	1,992,162
2009 City of Glendale	1,614,709

Sources: City of Los Angeles 2019; City of Long Beach 2019; City of Carson 2017; Los Angeles County 2015; City of Burbank 2013b; City of Glendale 2012.

3.7.2.2 Regulatory

This section identifies laws, regulations, and ordinances that are relevant to the impact analysis of GHG emissions in this PEIR.

International

In 2015, the 21st session of the Conference of Parties took place in Paris, France. The session included representatives from 196 parties to the United Nations Framework Convention on Climate Change. The outcomes from the Paris Agreement at this session include limiting global temperature increase well below 2°C, establishing binding commitments by all parties to make Nationally Determined Contributions and to pursue domestic policies aimed at achieving Nationally

Determined Contributions, and regular reporting by all countries on their emissions and progress made in implementing and achieving their Nationally Determined Contributions. In April 2016, 174 states and the European Union signed the agreement, including the United States. However, on November 4, 2019, President Donald Trump formally notified the United Nations that the United States would withdraw from the Paris Agreement after first making the announcement on June 1, 2017. This formal notification began a 1-year process for exiting the deal, which can occur no sooner than November 2020.

The Under2 Coalition is an international coalition of jurisdictions that signed the Global Climate Leadership Memorandum of Understanding following President Trump's decision to withdraw from the Paris Agreement. The Memorandum of Understanding aims to limit global warming to 2°C, to limit GHGs to below 80 to 95 percent below 1990 levels, and/or to achieve a per-capita annual emissions goal of less than 2 metric tons by 2050. The Memorandum of Understanding has been signed or endorsed by 135 jurisdictions (including California) that represent 32 countries and six continents.

Also in response to President Trump's decision to withdraw from the Paris Agreement, several states (including California) formed the United States Climate Alliance to continue to advance the goals of the Paris Agreement at the state level. This includes tracking and reporting progress on the U.S. goal of reducing GHG emissions 26 to 28 percent from 2005 levels by 2025.

Federal

There is currently no federal overarching law specifically related to climate change or the reduction of GHG emissions. Under the Obama Administration, the U.S. Environmental Protection Agency (EPA) had been developing regulations under the Clean Air Act. There have also been settlement agreements among EPA, several states, and nongovernmental organizations to address GHG emissions from electric generating units and refineries, as well as EPA's issuance of an "Endangerment Finding" and a "Cause or Contribute Finding." EPA has also adopted a Mandatory Reporting of Greenhouse Gases Rule and Clean Power Plan. Under the Clean Power Plan, EPA issued regulations to control CO_2 emissions from new and existing coal-fired power plants. However, on February 9, 2016, the Supreme Court issued a stay of these regulations pending litigation. Former EPA Administrator Scott Pruitt also signed a measure to repeal the Clean Power Plan. The fate of the proposed regulations is uncertain given the change in federal administrations and the pending deliberations in federal courts.

The National Highway Traffic Safety Administration sets the Corporate Average Fuel Economy Standards to improve the average fuel economy and reduce GHG emissions generated by cars and light-duty trucks. The National Highway Traffic Safety Administration and EPA have proposed to amend the current fuel efficiency standards for passenger cars and light trucks and establish new standards covering model years 2021 through 2026 by maintaining the current model year 2020 standards through 2026 (Safer Affordable Fuel-Efficient [SAFE] Vehicles Rule). California, 22 other states, the District of Columbia, and two cities filed suit against the proposed action on September 20, 2019 (*California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia). The lawsuit requests a "permanent injunction prohibiting Defendants from implementing or relying on the Preemption Regulation," but does not stay its implementation during legal deliberations. Part 1 of the SAFE Vehicles Rule went into effect on November 26, 2019. Part 2 of the rule was finalized on March 31, 2020.

State

California has taken proactive steps, briefly described below, to address issues associated with GHG emissions and climate change. Much of this establishes a broad framework for the State's long-term GHG and energy reduction goals and climate change adaptation program. The former and current governors of California have also issued several Executive Orders (EOs) related to the State's evolving climate change policy. Summaries of key policies, EOs, regulations, and legislation at the state level that are relevant to the Project are provided below in chronological order.

Assembly Bill 1493

Assembly Bill (AB) 1493 (2002) (Pavley I) requires CARB to develop and implement regulations to reduce automobile and light-truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with model year 2009. Additional strengthening of the Pavley standards (referred to previously as Pavley II and now referred to as the Advanced Clean Cars measure) was adopted for vehicle model years 2017–2025 in 2012. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per gallon in 2025. See the *Federal* section above for a discussion of the current status of the SAFE Vehicles Rule, which would affect fuel efficiency standards for passenger cars and light trucks subject to Pavley II.

Executive Order S-3-05

On June 1, 2005, Governor Arnold Schwarzenegger signed California EO S-3-05. The goal of this EO was to reduce California's GHG emissions to (1) 2000 levels by 2010; (2) 1990 levels by 2020; and (3) 80 percent below 1990 levels by 2050. EO S-3-05 also calls for the California Environmental Protection Agency to prepare biennial science reports on the potential impact of continued global warming on certain sectors of the California economy. As a result of the scientific analysis presented in these biennial reports, a comprehensive Climate Adaptation Strategy was released in December 2009 following extensive interagency coordination and stakeholder input. The latest of these reports, Climate Action Team Biennial Report, was published in December 2010.

Green Building Code and Title 24 Updates

The Green Building Standards Code (CALGreen) applies to the planning, design, operation, construction, use, and occupancy of newly constructed buildings and requires the installation of energy- and water-efficient indoor infrastructure for all new projects after January 1, 2011. CALGreen also requires newly constructed buildings to develop a waste management plan and divert at least 50 percent of the construction materials generated during project construction.

Administrative regulations related to CALGreen Part 11 and the 2016 Building Energy Efficiency Standards were adopted in 2016 (effective January 1, 2017). The 2016 standards resulted in residential construction that was 25 percent more efficient than previous residential construction. Part 11 also established voluntary standards, which became mandatory in the 2010 edition of the code, including planning and designing for sustainable site development, energy efficiency, water conservation, material conservation, and reductions in internal air contaminants. The standards offer builders better windows, insulation, lighting, ventilation systems, and other features to reduce energy consumption in homes and businesses.

On May 9, 2018, the California Energy Commission (CEC) adopted the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020. The 2019 standards mandate higher

efficiency levels and rooftop solar photovoltaic systems for all new residential buildings constructed in 2020 and beyond. The 2019 standards are expected to result in residential buildings that are, on average, 53 percent more energy efficient than those built under the 2016 standards. Non-residential buildings will be 30 percent more energy efficient because the standards will update indoor and outdoor lighting to make maximum use of light-emitting diode (LED) technology. Future CALGreen standards are expected to include a requirement of zero net energy for newly constructed commercial buildings.

Assembly Bill 1826

In October 2014 Governor Jerry Brown signed AB 1826 (Chesbro; Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the State implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units (although multifamily dwellings are not required to have a food waste diversion program). Organic waste (also referred to as *organics* throughout this section) means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. As of January 1, 2019, businesses that generate 4 cubic yards or more of commercial solid waste per week must arrange for organic waste recycling services. The California Department of Resources Recycling and Recovery is scheduled in 2020 to conduct a formal review of statewide disposal rates and evaluate whether organic recycling requirements should be expanded to cover business that generate 2 cubic yards.

Assembly Bill 32

One goal of EO S-03-05 was further reinforced by AB 32 (Chapter 488, Statutes of 2006), the Global Warming Solutions Act of 2006, which requires the State to reduce GHG emissions to 1990 levels by 2020. Since AB 32 was adopted, CARB, CEC, the California Public Utilities Commission, and the Building Standards Commission have been developing regulations that will help meet the goals of AB 32. Under AB 32, CARB is required to prepare a scoping plan and update it every 4 years. CARB's Scoping Plan was approved in 2008, the First Update approved in 2014, and an additional update was approved in 2017 (see discussion of Senate Bill [SB] 32 below). The 2008 Scoping Plan identifies specific measures to reduce GHG emissions to 1990 levels by 2020, and requires CARB and other State agencies to develop and enforce regulations and other initiatives for reducing GHGs. Specifically, the 2008 Scoping Plan articulates a key role for local governments, recommending they establish GHG reduction goals for both their municipal operations and the community consistent with those of the State.

Low Carbon Fuel Standard

With EO S-01-07, Governor Schwarzenegger set forth the low carbon fuel standard (LCFS) for California in 2007. Under this EO, the carbon intensity of California's transportation fuels is to be reduced by at least 10 percent by 2020. In September 2018, the LCFS regulation was amended to increase the statewide goal to a 20 percent reduction in carbon intensity of California's transportation fuels by at least by 2030.

Senate Bill 375

SB 375, signed into law by Governor Schwarzenegger on September 30, 2008, became effective January 1, 2009. This law requires the state's 18 Metropolitan Planning Organizations to develop sustainable communities strategies (SCS) as part of their regional transportation plans (RTPs) through integrated land use and transportation planning, and to demonstrate an ability to attain the GHG emissions reduction targets that CARB established for the region by 2020 and 2035. This would be accomplished through either the financially constrained SCS as part of the RTP or an unconstrained alternative planning strategy. If regions develop integrated land use, housing, and transportation plans that meet the SB 375 targets, new projects in these regions can be relieved of certain CEQA review requirements.

Senate Bills 1078, 107, and 2

SBs 1078 (2002), 107 (2006) and 2 (2011), California's Renewables Portfolio Standard (RPS), obligates investor-owned utilities, energy service providers, and Community Choice Aggregators to procure additional retail sales per year from eligible renewable sources with the long-range target of procuring 33 percent of retail sales from renewable resources by 2020. The California Public Utilities Commission and CEC are jointly responsible for implementing the program.

Executive Order B-30-15

Governor Brown signed EO B-30-15 on April 29, 2015. EO B-30-15 established a medium-term goal for 2030 of reducing GHG emissions by 40 percent below 1990 levels and requires CARB to update its current AB 32 Scoping Plan to identify measures to meet the 2030 target. EO B-30-15 supports EO S-3-05 but is only binding on State agencies.

Senate Bill 32 and Assembly Bill 197

SB 32 (2016) requires CARB to ensure that statewide GHG emissions are reduced to at least 40 percent below the 1990 level by 2030, consistent with the target set forth in EO B-30-15. The companion bill to SB 32, AB 197, creates requirements to form a Joint Legislative Committee on Climate Change Policies, requires CARB to prioritize direct emission reductions and consider social costs when adopting regulations to reduce GHG emissions beyond the 2020 statewide limit, requires CARB to prepare reports on sources of GHGs and other pollutants, establishes 6-year terms for voting members of CARB, and adds two legislators as non-voting members of CARB. CARB adopted the 2017 Scoping Plan in November 2017 (updated in December 2017) to meet the GHG reduction requirement set forth in SB 32. The 2017 Scoping Plan proposes continuing the major programs of the 2008 Scoping Plan, including Cap-and-Trade regulation; LCFS; more efficient cars, trucks, and freight movement; RPS, and reducing CH_4 emissions from agricultural and other wastes.

Senate Bill 32 Scoping Plan

CARB approved the 2017 Scoping Plan update in December 2017, which builds on the programs set in place as part of the 2008 Scoping Plan that was drafted to meet the 2020 reduction targets per AB 32. The 2017 Scoping Plan proposes meeting the 2030 goal by accelerating the focus on zero and near-zero technologies for moving freight, continued investment in renewables, greater use of low-carbon fuels including electricity and hydrogen, stronger efforts to reduce emissions of SLCPs (CH_4, black carbon, and fluorinated gases), further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car, continuing the Cap-and-Trade program, and

ensuring that natural lands become carbon sinks to provide additional emissions reductions and flexibility in meeting the target. The 2017 Scoping Plan also recommends that local governments aim to achieve community-wide efficiency of 6 metric tons of CO_2e ($MTCO_2e$) per capita by 2030 and 2 $MTCO_2e$ per capita by 2050 to be used in local climate action planning. These efficiency targets replace the "15 percent from 2008 levels by 2020" approach recommended in the 2008 Scoping Plan, which would allow for local governments to grow in a sustainable manner.

Senate Bill 350 and Senate Bill 100

SB 350 (the Clean Energy and Pollution Reduction Act) was signed into law in October 2015. SB 350 requires CARB (in coordination with the California Public Utilities Commission and CEC) to coordinate and implement the following overarching goals:

- Increase the RPS to 50 percent of retail sales by 2030 and ensure grid reliability.
- Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.
- Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in their integrated resource plans (IRPs) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs. The IRPs will detail how each large utility will meet their customers' resource needs, minimize price increases, reduce emissions, and ramp up the deployment of clean energy resources.

In September 2018, SB 100 was signed into law, which implements the following goals:

- Increase the RPS to 50 percent of retail sales by 2026 (moved up by 4 years from SB 350).
- Increase the RPS to 60 percent of retail sales by 2030 (new 2030 target).
- Increase the RPS to 100 percent of retail sales by 2045 (carbon-free goal for 2045).

SB 100 is a legislative action that was signed into law after the 2017 Scoping Plan was adopted. The 2017 Scoping Plan modeling is based on the SB 350 target of 50 percent renewables by 2030. However, the new SB 100 target of 60 percent renewables by 2030 and 100 percent renewables by 2045 supersede the goals of SB 350 and will be included in future scoping plan updates.

Senate Bill 743

To further the state's commitment to the goals of SB 375, AB 32, and AB 1358, Governor Brown signed SB 743 on September 27, 2013. SB 743 adds Chapter 2.7*, Modernization of Transportation Analysis for Transit-Oriented Infill Projects*, to Division 13 (Section 21099) of the Public Resources Code. Key provisions of SB 743 include eliminating the measurement of vehicle delay, or level of service (LOS), as a metric that can be used for measuring traffic impacts. Under SB 743, the focus of transportation analysis shifts from LOS to the reduction of GHG emissions through the creation of multimodal transportation networks and promotion of a mix of land uses to reduce vehicle miles traveled (VMT). SB 743 required the California Governor's Office of Planning and Research (OPR) to amend the State CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly for areas served by transit (i.e., transit priority areas), those alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation

networks, and a diversity of land uses" (New Public Resources Code Section 21099[b][1]). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." OPR also has discretion to develop alternative criteria for areas that are not served by transit, if appropriate.

Pursuant to the mandate in SB 743, OPR adopted the revised State CEQA Guidelines in December 2018, recommending the use of VMT for analyzing transportation impacts under CEQA. In turn, Section 15064.3 was added to the State CEQA Guidelines and states "generally, vehicle miles traveled [VMT] is the most appropriate measure of transportation impacts." The revised State CEQA Guidelines require that lead agencies remove automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, as a criterion for determining a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact." The requirements of SB 743 went into full effect as of July 1, 2020. The County has developed Transportation Impact Guidelines consistent with SB 743, which are described below.

Mobile Source Strategy

CARB developed the Mobile Source Strategy to provide an integrated action plan that establishes an integrated planning perspective and common vision for transforming the mobile sector. The Mobile Source Strategy supports multiple planning efforts, including the State Implementation Plans, the Scoping Plan, the SLCP Strategy (discussed below), and the Sustainable Freight Action Plan. The Mobile Source Strategy outlines CARB's approach to reducing emissions from mobile sources. The strategy includes actions to modernize and upgrade transportation infrastructure, enhance system-wide efficiency and mobility options, and promote clean economic growth.

Short-Lived Climate Pollutant Strategy

SB 1383, adopted in 2013, requires CARB to develop and implement an SLCP Strategy with the following 2030 goals: 40 percent reduction in CH_4, 40 percent reduction in HFC gases, and 50 percent reduction in anthropogenic black carbon below 2013 levels. Per its directive, CARB adopted the SLCP Strategy, establishing a path to decrease SLCPs from various sectors of the economy. Strategies span from wastewater and landfill practices and CH_4 recovery to reducing natural gas leaks and consumption. The SLCP strategy also identifies measures that can reduce HFC emissions through incentive programs and limitations on the use of high-GWP refrigerants in new refrigeration and air-conditioning equipment.

Cap-and-Trade

CARB adopted the Cap-and-Trade program in October 2011. The California Cap-and-Trade program is a market-based system with an overall emissions limit for affected emission sources. Affected sources include in-state electricity generators, hydrogen production, petroleum refining, and other large-scale manufacturers and fuel suppliers and distributors. The original Cap-and-Trade program set a compliance schedule through 2020. AB 398 extends the program through 2030 and requires CARB to make refinements, including establishing a price ceiling. Revenue generated from the Cap-and-Trade program are used to fund various programs. AB 398 established post-2020 funding priorities, to include (1) Air Toxics and Criteria Pollutants, (2) Low and Zero Carbon Transportation,

(3) Sustainable Agricultural Practices, (4) Healthy Forests and Urban Greening, (5) Short-lived Climate Pollutants, (6) Climate Adaptation and Resiliency, and (7) Climate and Clean Energy Research.

Executive Order B-55-18

Based on the worldwide scientific agreement that carbon neutrality must be achieved by midcentury, EO B-55-18 establishes a new State goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. The EO charges CARB with developing a framework for implementing and tracking progress toward these goals. This EO extends EO S-3-05, but is only binding on State agencies. However, given this directive, it is likely that the carbon neutrality goal for 2045 will make its way into future updates to the scoping plan, which must be updated every 5 years.

Regional

South Coast Air Quality Management District

As discussed in Section 3.2, *Air Quality*, the South Coast Air Quality Management District (SCAQMD) has primary responsibility for development and implementation of rules and regulations to attain the national and California ambient air quality standards as well as permitting new or modified sources, developing air quality management plans, and adopting and enforcing air pollution regulations within the South Coast Air Basin. CARB's 2017 Scoping Plan does not provide an explicit role for local air districts with respect to implementing the reduction goals of SB 32 and AB 32, but CARB does state that it will work actively with air districts in coordinating emissions reporting, encouraging and coordinating GHG reductions, and providing technical assistance in quantifying reductions. The ability of air districts to control emissions (both criteria pollutants and GHGs) is provided primarily through permitting but also through their role as a CEQA lead or commenting agency, the establishment of CEQA thresholds, and the development of analytical requirements for CEQA documents.

On December 5, 2008, the SCAQMD Governing Board considered draft GHG guidance, and adopted a staff proposal for an interim GHG significance threshold of 10,000 $MTCO_2e$ per year for industrial permitting projects where SCAQMD is lead agency. The board letter, resolution, interim GHG significance threshold, draft guidance document, and attachments can be found under Board Agenda Item 31 of the December 5, 2008, Governing Board Meeting Agenda.[2] In its draft guidance document, SCAQMD included evidence and rationale for developing thresholds, specifically citing the State CEQA Guidelines §15064.7(a) *("each public agency is encouraged to develop and publish thresholds of significance that the agency uses in the determination of the significance of environmental effects"*) and Subsection (b) (*"Thresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule or regulation, and developed through a public review process and be supported by substantial evidence"*). SCAQMD developed thresholds for both stationary sources and land use development projects. SCAQMD's recommended GHG significance threshold underwent a public review process as part of stakeholder working group meetings that were open to the public. The draft guidance document provides the supporting analysis and methodology for developing the GHG significance thresholds for both

[2] Board Agenda Item 31 data available at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds.

stationary sources and land use development projects. After completion of the public process, the proposed interim thresholds for land use development projects was brought to the SCAQMD's Governing Board but were not formally adopted, while the threshold involving industrial permitting projects where SCAQMD is lead agency was adopted.

For industrial process, SCAQMD has formally adopted a 10,000 $MTCO_2e$ threshold for industrial (permitted) facilities where SCAQMD is the lead agency.

SCAQMD noted that the proposed interim GHG significance threshold for evaluation of land use development projects was only a recommendation for lead agencies and not a mandatory requirement. The GHG significance threshold may be used at the discretion of the local lead agency. The draft GHG guidance identified a tiered approach for determining the significance of GHG emissions, one of which included the use of numerical screening thresholds. With respect to numerical GHG significance thresholds, SCAQMD proposed two different approaches to be taken by lead agencies when analyzing GHG emissions:

- Option #1 includes using separate numerical thresholds for residential projects (3,500 $MTCO_2e$ per year), commercial projects (1,400 $MTCO_2e$ per year), and mixed-use projects (3,000 $MTCO_2e$ per year).
- Option #2 is use of a single numerical threshold for all non-industrial projects of 3,000 $MTCO_2e$ per year. SCAQMD's most recent recommendation per its September 2010 meeting minutes is to use option #2.

Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

On September 3, 2020, the Southern California Association of Governments' (SCAG's) Regional Council formally adopted Connect SoCal (2020–2045 RTP/SCS). On May 7, 2020, the 2020-2045 RTP/SCS was approved by SCAG's Regional Council for federal transportation conformity purposes only. The plan is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The plan charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably.

The 2020–2045 RTP/SCS is consistent with SB 375, which requires SCAG to adopt an SCS that outlines policies to reduce per-service-population GHG emissions from automobiles and light trucks. SCAG's current target is to reduce per-capita GHG emissions from passenger vehicles by approximately 8 percent by 2020 and 19 percent by 2035 over base year 2005 (CARB 2020b). The 2020–2045 RTP/SCS achieves per-capita GHG emissions reductions relative to 2005 of 8 percent in 2020 and 19 percent in 2035. While this plan is being released in 2020, the same year as the first target date, the achievement is based on modeled results, as observed data are not yet available.

The SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced per-capita VMT. The SCS strategies included in the 2020–2045 RTP/SCS to reduce GHG emissions consist of focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Los Angeles County General Plan

Adopted in 2016, the *Los Angeles County General Plan*'s Air Quality Element outlines goals and policies that would also reduce GHG emissions and address the impacts of climate change. Relevant policies are as follows:

- **Policy AQ 3.2:** Reduce energy consumption in County operations by 20 percent by 2015.
- **Policy AQ 3.3**: Reduce water consumption in County operations.
- **Policy AQ 3.5:** Encourage energy conservation in new development and municipal operations.
- **Policy AQ 3.7:** Support and expand urban forest programs within the unincorporated areas.

In addition, the general plan contains policies that encourage water conservation and protection, traffic reduction, sustainable development, and waste minimization that would further reduce GHG emissions (Los Angeles County 2016).

Los Angeles County Climate Action Plan

Los Angeles County's *Community Climate Action Plan* (2020 CCAP), adopted in 2015, supplements the *Los Angeles County General Plan* and describes the County's plan to reduce the impacts of climate change by reducing GHG emissions from community activities in the unincorporated County areas by at least 11 percent below 2010 levels by 2020 (Los Angeles County 2015). The 26 local community actions relate to green buildings and energy; land use and transportation; water conservation and wastewater; waste reduction, reuse, and recycling; and land conservation and tree planting (Los Angeles County 2015). On June 6, 2018, the County adopted an ordinance amendment to Title 22 in order to implement the 2020 CCAP actions. This ordinance allows for environmentally friendly roof and pavement materials and electric vehicle infrastructure, requires signs in on-site loading areas to encourage vehicle idle reduction, and regulates secondary land uses under high-voltage power lines in select zones.

As of August 2020, the 2020 CCAP is in the process of being updated. The draft Los Angeles County Climate Action Plan (CAP) builds upon the efforts within the 2020 CCAP, as well as the *OurCounty Los Angeles Countywide Sustainability Plan* (OurCounty Sustainability Plan; described below). The Los Angeles County CAP outlines actions that the County plans to take to reduce GHG emissions and adapt to a changing climate in unincorporated County areas. The Los Angeles County CAP ties together existing climate change initiatives and provides a blueprint for targeting carbon neutrality by 2045 in unincorporated County areas. In that sense, the Los Angeles County CAP is aligned with EO B-55-18, which calls for statewide carbon neutrality by 2045. The Los Angeles County CAP was released for public review in March 2020 and received public comments through April 2020 (Los Angeles County 2020). At this time, the anticipated adoption date of the plan is unknown.

Los Angeles County Sustainability Plan

In July 2019, the County adopted the OurCounty Sustainability Plan. OurCounty Sustainability Plan includes 12 primary goals that have a total of 37 strategies, with a total of 159 actions. The plan identifies lead County entities and partners for each goal. The plan is intended to help guide decision-making in unincorporated County areas and provide a model for decision-making in the 88 incorporated cities in the County. As a strategic plan, OurCounty Sustainability Plan does not supersede land use plans that have been adopted by the Regional Planning Commission and Board

of Supervisors, including the *Los Angeles County General Plan* and various community, neighborhood, and area plans.

Local

Frame 1

City of Long Beach

City of Long Beach General Plan

Several air quality policies in the *City of Long Beach General Plan* are relevant to GHG emissions. They include the following:

- **Policy 7.1:** Reduce energy consumption through conservation improvements and requirements.
- **Policy 7.2:** Promote local recycling of wastes and use of recycled materials.

In addition, general plan policies that encourage water conservation and protection, traffic reduction, and efficient land uses would further reduce GHG emissions (City of Long Beach 1996).

City of Long Beach Climate Action and Adaptation Plan

In May 2019, the City of Long Beach released a working draft of its *Climate Action and Adaptation Plan*. This plan includes mitigation and adaptation strategies for the city to address climate impacts and to reduce the city's impacts on climate change through reducing GHG emissions. Priority mitigation actions in the transportation, energy, and waste sectors are presented and include actions such as providing expanding and improving pedestrian infrastructure, providing access to renewable generated electricity, and ensuring compliance with waste collection programs. Adaptation strategies are primarily focused on addressing extreme heat, air quality, drought, and flooding and include actions such as encouraging urban agriculture, implementing additional water conservation programs, and incentivizing renewable energy sources. A final draft plan will be released sometime in 2020 and will ultimately be incorporated into the city's general plan (City of Long Beach 2019).

City of Los Angeles

City of Los Angeles General Plan

The Air Quality Element of the *City of Los Angeles General Plan* (City of Los Angeles 1992) includes goals related to GHG emissions. Relevant policies are as follows:

- **Policy 4.2.5:** Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.
- **Policy 5.1.2:** Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.
- **Policy 5.1.4:** Reduce energy consumption and associated emissions by encouraging waste reduction and recycling.
- **Policy 5.3.1:** Support the development and use of equipment powered by electric or low-emitting fuels.

In addition, the Air Quality Element includes goals that would support further reduction of GHG emissions. They include less reliance on single-occupancy vehicles, efficient management of transportation facilities and system infrastructure, reduction of vehicle traffic during peak periods, and addressing the relationship between land use, transportation, and air quality.

City of Los Angeles Sustainable City pLAn

In 2019, *L.A.'s Green New Deal: Sustainable City pLAn* was released and contains actions that would also addresses GHG emissions. The plan is made up of short-term (2017) and longer-term (2025 and 2035) targets in 14 categories that will advance the city's environment, economy, and equity. These topic areas include local water, local solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, prosperity and green jobs, preparedness and resiliency, air quality, environmental justice, urban ecosystem, livable neighborhoods, and leadership by example (City of Los Angeles 2019).

Frame 2

City of Carson

City of Carson General Plan

The *Carson General Plan* (City of Carson 2004) does not contain GHG-specific policies, but general plan policies related to air quality would be relevant and would reduce GHG emissions. They include the following policies:

- **Policy AQ-2.2:** Utilize incentives, regulations and implement the Transportation Demand Management requirements in cooperation with other jurisdictions to eliminate vehicle trips which would otherwise be made and to reduce vehicle miles traveled for automobile trips which still need to be made.
- **Policy AQ-2.4:** Continue to work to relieve congestion on major arterials and thereby reduce emissions.
- **Policy AQ-2.5:** Continue to improve existing sidewalks, bicycle trails, and parkways, and require sidewalk and bicycle trail improvements and parkways for new developments.
- **Policy AQ-2.6:** Encourage in-fill development near activity centers and along transportation routes.
- **Policy AQ-3.1**: Continue to promote the use of alternative clean fueled vehicles for personal and business use.

City of Carson Climate Action Plan

The City of Carson's CAP, adopted in 2017, sets a long-term goal of reducing GHG emissions by 49 and 80 percent below 2005 levels by 2035 and 2050, respectively. The CAP identifies emission reduction strategies, including those involving land use and transportation, energy efficiency, solid waste, urban greening, and energy generation and storage. Strategies involve identifying ways to reduce automobile emissions, emphasizing energy efficiency, increasing waste diversion, creating carbon sinks, and implementing clean, renewable energy (City of Carson 2017).

City of Compton

City of Compton Draft General Plan

The *Draft Compton General Plan 2030*'s Air Quality Element (City of Compton 2011) contains additional policies related to air quality and health that are relevant to GHGs. They include the following:

- **Air Quality Element Policy 4.1.** The City of Compton will support the use of energy-efficient equipment and design in City facilities and infrastructure.
- **Air Quality Element Policy 4.2.** The City of Compton will encourage incorporation of energy features, including passive solar, in the construction and rehabilitation of new and existing structures.

In addition, policies that encourage sustainable transportation and land use planning would further reduce GHG emissions.

City of Long Beach

Applicable regulations for the City of Long Beach are described above.

Unincorporated County

Applicable regulations for unincorporated County areas are described above in Frame 2.

Frame 3

City of Compton

Applicable regulations for Compton are described above in Frame 2.

City of Cudahy

City of Cudahy General Plan

The Air Quality Element in the *Cudahy 2040 General Plan* contains policies related to air quality that are relevant to reducing GHG emissions, including policies related to the energy, land use, and waste sectors (City of Cudahy 2018). They include the following:

- **Policy AQE-3.1:** Support, expand, and incentivize the use of renewable energy resources such as geothermal, wind, solar, and others.
- **Policy AQE-3.3:** Encourage participation in and expansion of the Cudahy Hero program, which offers financing for energy efficient products and renewable energy systems.
- **Policy AQE-3.4:** Encourage and promote the establishment of local green energy generation projects.
- **Policy AQE-3.5:** Consider strategies that will encourage property owners to pursue energy and water conservation/efficiency retrofits in existing buildings.
- **Policy AQE-3.6:** Develop energy consumption regulations for public and private development that meet or exceed California Energy Efficiency Standards and California Green Building Standards Codes.
- **Policy AQE-3.7:** Expand native and drought-resistant trees and plantings palettes (urban forest) to support natural air filtering and cooling capabilities and in accordance with California Air Resources Board's urban forest protocol.

- **Policy AQE-3.8:** Increase public awareness about climate change; encourage Cudahy residents and businesses to become involved in activities and lifestyle changes that help reduce GHG emissions.
- **Policy AQE-4.1:** Adopt a citywide benchmark goal to divert 75 percent of annual waste away from landfills by 2025; track annual progress.
- **Policy AQE-4.2:** Develop a minimum 50 percent diversion rate requirement for construction and demolition projects.
- **Policy AQE-4.3:** Increase composting, recycling, and efforts to reduce waste generation, focusing especially on large commercial and industrial waste producers, but also accommodating the needs of residents in multi-unit housing.

City of Downey

City of Downey General Plan

The *Downey Vision 2025 General Plan* (City of Downey 2005) does not contain GHG-specific policies, but general plan policies related to air quality would reduce GHG emissions. These include the following:

- **Program 4.5.1.4:** Encourage alternative modes of travel, such and walking and cycling, to vehicles to reduce emission associated with vehicle use.
- **Program 4.5.1.5:** Promote the use of alternative fuel vehicles, including clean diesel, compressed natural gas, hydrogen, that result in reduced emission, including in instances involving City operations.

In addition, general plan policies related to sectors, including land use, transportation, water, waste, and energy, would further reduce GHG emissions.

City of Lynwood

City of Lynwood General Plan

The *City of Lynwood General Plan* contains various measures that would affect sectors such as land use, transportation, water, solid waste, and energy and would reduce GHG emissions. Such measures include implementing energy conservation measures, encouraging the use of drought-tolerant landscaping, and promoting a circulation system to serve all travel needs (City of Lynwood 2003).

City of Paramount

City of Paramount General Plan

The *Paramount General Plan* was adopted in 2007 and does not contain GHG-specific policies. However, general plan policies related to land use, circulation, and resources would reduce GHG emissions. These include encouraging alternative modes of transportation, resource conservation, solid waste reduction, and thoughtful development (City of Paramount 2007).

City of South Gate

City of South Gate General Plan

Adopted in 2009, the *South Gate General Plan 2035*'s Green City Element includes a climate change section that is focused on reducing the city's production of GHG emissions (City of South Gate 2009).

Relevant GHG policies across the energy, land use, transportation, and waste sectors include the following:

- **GC 7 Policy 1:** The City will proactively cooperate with the State to implement AB 32, which calls for reducing GHG emissions to 1990 levels by 2020 and Executive Order S-3-05, which calls for 1990 levels by 2020 and 80 percent below 1990 levels by 2050.
- **GC 7 Policy 3:** The City will strive to reduce its per capita GHG emissions to 15 percent below 2005 levels by 2020.
- **GC 7 Policy 4:** The City will reduce GHG emissions and adapt to climate change with efforts in the following areas:
    - **Energy** – Major mitigation and adaptation strategies will include incentivizing renewable energy installation, facilitating green technology and business, and reducing community-wide energy consumption.
    - **Land Use** – Major mitigation and adaptation strategies will include strategies that include transit-oriented development, infill development, and encouraging a mix of uses.
    - **Transportation** – Major mitigation and adaptation strategies will include enhanced multi-modal transportation, cycling infrastructure and walking infrastructure.
    - **Buildings** – Major mitigation adaptation strategies will include green building incentives, assessment of green building techniques as a formal development of a green building ordinance. Adaptation strategies will also include increased water efficiency in buildings.
    - **Waste** – Major mitigation strategies will include increased composting and recycling, and efforts to reduce waste generation.
    - **Ecology** – Major mitigation strategies will include tree planting and city greening. Major adaptation strategies will include native and drought-resistant planting.
    - **Government Operations** – Major mitigation strategies will include green procurement and energy saving in operations and maintenance.

Unincorporated County

Applicable regulations for unincorporated County areas are described above in Frame 2.

Frame 4

City of Bell

City of Bell General Plan

The *City of Bell 2030 General Plan* includes a goal to prepare a sustainability CAP to address issues related to global warming and climate change. In addition, the general plan contains policies that encourage sustainable practices to conserve water, waste, energy and other resources and sustainable development that would reduce vehicle use. These policies would also reduce GHG emissions (City of Bell 2018).

City of Bell Gardens

City of Bell Gardens General Plan

The *City of Bell Gardens General Plan 2010* was adopted in 1995 and does not contain GHG-specific policies. However, general plan policies related to land use, circulation and transportation, and conservation would reduce GHG emissions. These include encouraging alternative modes of transportation, resource conservation, and thoughtful development (City of Bell Gardens 1995).

City of Commerce

City of Commerce General Plan

The *City of Commerce 2020 General Plan* does not contain GHG-specific policies, but general plan policies related to air quality and various sectors, including land use, transportation, and energy, would reduce GHG emissions. These policies encourage energy conservation, traffic reduction, and sustainable development (City of Commerce 2008).

City of Huntington Park

City of Huntington Park General Plan

The draft *City of Huntington Park 2030 General Plan'*s Resource Management Element includes policies that aim to address air pollution in the city. Some of these policies are relevant to GHG emissions, as well, and include the following:

- **Resource Management Element Policy 4:** The City of Huntington Park shall encourage the use of energy conservation devices in project design and construction to increase energy efficiency and decrease pollution emissions from energy production and use.

In addition, the draft *City of Huntington Park 2030 General Plan* contains policies that encourage water conservation and protection, energy conservation, traffic reduction, sustainable development, waste minimization, and an urban canopy that would reduce GHG emissions (City of Huntington Park 2017).

City of Maywood

City of Maywood General Plan

The *City of Maywood General Plan*'s Conservation Element identified the need to protect natural resources. Policies relevant to air quality are also relevant to reducing GHG emissions. Relevant policies from this element include the following:

- **Policy 1.1:** Require landscaping and vegetative cover for its own value and for its value as wildlife habitat.
- **Policy 3.2:** Require drought resident trees and plants for all new landscaping for commercial and industrial development.
- **Policy 3.4:** Encourage water conservation in residential, commercial, and industrial developments through the use of water saving irrigation systems.

In addition, the general plan includes policies involving the transportation, water, energy, and land use sectors that would further reduce GHGs (City of Maywood 2008).

City of Vernon

City of Vernon General Plan

The *City of Vernon General Plan* was amended in 2015 and does not contain GHG-specific policies. However, general plan policies related to land use, circulation, and resources would reduce GHG emissions. These include encouraging alternative modes of transportation, resource conservation, and thoughtful development (City of Vernon 2015).

Unincorporated County

Applicable regulations for unincorporated County areas are described above in Frame 2.

Frame 5

City of Los Angeles

Applicable regulations for the City of Los Angeles are described above in Frame 1.

Frame 6

City of Los Angeles

Applicable regulations for the City of Los Angeles are described above in Frame 1.

City of Glendale

City of Glendale General Plan

The *Envision Glendale 2040 General Plan* does not contain GHG-specific policies. However, general plan policies related to land use, circulation, and resources would reduce GHG emissions. These include encouraging alternative modes of transportation, resource conservation, and thoughtful development (City of Glendale 2020). In addition, in March 2012, the City completed the *Greener Glendale Plan*, which promotes sustainable living and conservation programs within the community and government operations to meet State-mandated GHG reduction targets. The plan includes strategies in various sectors, including waste, energy, water, transportation, and building design. Strategies are centered around conservation, reduced consumption, and efficiency (City of Glendale 2012).

Frame 7

City of Los Angeles

Applicable regulations for the City of Los Angeles are described above in Frame 1.

City of Burbank

City of Burbank General Plan

The *Burbank2035 General Plan*'s Air Quality and Climate Change Element (City of Burbank 2013a) contains policies that aim to reduce GHG emissions through complying with statewide GHG reduction goals and preparing for anticipated effects of climate change. The City is striving to reduce communitywide GHG emissions by at least 30 percent from current levels by 2035. Other relevant policies are as follows:

- **Policy 3.4:** Reduce GHG emissions from new development by promoting water conservation and recycling; promoting development that is compact, mixed-use, pedestrian-friendly, and transit-oriented; promoting energy-efficient building design and site planning; and improving the jobs/housing ratio.
- **Policy 3.6:** Reduce GHG emissions by encouraging the retrofit of older, energy inefficient buildings.

- **Policy 3.8:** Transition all economic sectors, new development, and existing infrastructure and development to low- or zero-carbon energy sources. Encourage implementation and provide incentives for low- or zero-carbon energy sources.

In addition, the general plan includes policies that would encourage sustainable transportation development and resource conservation that would reduce GHG emissions.

City of Burbank Climate Action Plan

The City of Burbank's CAP, *Burbank2035 Greenhouse Gas Reduction Plan* (GGRP), implements the GHG goals and policies from the Air Quality and Climate Change Element of the *Burbank2035 General Plan* to achieve a communitywide emissions reduction goal of 30 percent by 2035. The GGRP identifies emission reduction opportunities with the community, in addition to the incorporation of best practices from other jurisdictions and organizations and State and regional laws, guidance, and recommendations. The primary ways to reduce communitywide GHG emissions in Burbank include actions in the building and energy, transportation, water conservation, and waste reduction areas. Measures include energy efficiency in new construction, pedestrian enhancements, water conservation programs, and waste diversion programs (City of Burbank 2013b).

Unincorporated County

Applicable regulations for unincorporated County areas are described above in Frame 2.

Frame 8

City of Los Angeles

Applicable regulations for the City of Los Angeles are described above in Frame 1.

Frame 9

City of Los Angeles

Applicable regulations for the City of Los Angeles are described above in Frame 1.

3.7.3 Impact Analysis

This section describes at a programmatic level the impacts related to GHG emissions for the Typical Projects (i.e., the Common Elements and Multi-Use Trails and Access Gateways), six kit of parts (KOP) categories, and the *2020 LA River Master Plan* in its entirety. Where the two Typical Projects or the six KOP categories have similar impacts related to a specific criteria, the discussion is combined. Where differences between the Typical Projects or the KOP categories are identified, the impact analysis is presented separately. This section also describes the methods used to determine impacts of the Project and lists the thresholds used to conclude whether an impact would be significant. Measures to reduce significant impacts accompany each impact discussion, where necessary.

3.7.3.1 Methods for Estimating Emissions

Construction of the *2020 LA River Master Plan* would generate emissions of CO_2, CH_4, and N_2O associated with mobile and stationary construction equipment exhaust and employee and haul truck vehicle exhaust. Operation of the *2020 LA River Master Plan* would generate emissions of CO_2, CH_4, and N_2O associated with area sources, energy consumption, motor vehicles, waste generation, water consumption, and any stationary sources. Area sources include landscaping activities and consumer products (e.g., cleaning supplies, kitchen aerosols). Energy sources include electricity consumption and natural gas combustion for lighting and heating requirements. Mobile sources include vehicle trips from employees, vendors, and haul trips. Waste generation refers to decomposition of waste generated during operations. The water category includes electricity consumption associated with the supply, treatment, and distribution of water.

Emissions associated with the six KOP categories and related design components—as well as the *2020 LA River Master Plan* in its entirety—are analyzed qualitatively at a program level. The two Typical Projects, the Common Elements and the Multi-Use Trails and Access Gateways, are analyzed in greater detail than the other elements based on the design components and Common Elements Typical Projects for which Public Works could make reasonable and informed construction and operations assumptions. The methodology for quantifying construction- and operations-related GHG emissions from the two Typical Projects is presented below.

Quantifying Construction Mass Emissions from the Typical Projects

GHG emissions associated with construction of the Typical Projects were estimated using the most recent version of the California Emissions Estimator Model (CalEEMod), version 2016.3.2, and the methods applied to the analysis of criteria pollutant emissions, which are summarized in Section 3.2, *Air Quality*, of this PEIR. See Appendix C for the CalEEMod inputs and results for both Typical Projects.

Because impacts from construction activities would occur over a relatively short period of time (19 to 20 months depending on the Typical Project), they typically contribute a relatively small portion of the overall lifetime of a project's GHG emissions. In accordance with SCAQMD guidance, the Project's construction-related GHG emissions were amortized over a 30-year period (typically defined as the lifetime of a project) and added to operational emissions to evaluate the Typical Projects' total GHG emissions. Use of the SCAQMD-recommended 30-year period in this analysis is generally consistent with the length of the lifetime of the *2020 LA River Master Plan*, which would be implemented over a 25-year period through 2045.

Quantifying Operations Mass Emissions from the Typical Projects[3]

GHG emissions associated with operation of the Typical Projects were estimated using CalEEMod and the methods applied to the analysis of criteria pollutant emissions, which are summarized in

[3] Sources of GHG emissions during maintenance activiites could include intermittent vehicle trips from maintenance workers and any area source landscaping equipment used for maintenance of vegetation. CalEEMod by default quantifies emissions associated with landscaping but does not explicitly do so for maintenance worker vehicle trips. It is anticipated that maintenance would occur at a low frequency and low intensity and thereby result in a negligible amount of emissions. Accordingly, the maintenance worker vehicle trips were not quantified as part of this analysis.

Section 3.2, *Air Quality*, of this PEIR. See Appendix C for the CalEEMod inputs and results for both Typical Projects.

In accordance with SCAQMD guidance, emissions from all operational sources associated with the Typical Projects were calculated annually and added to amortized construction emissions to evaluate the total GHG emissions.

For purposes of analysis, the electricity emissions are based on the Los Angeles Department Water and Power's 2016 carbon intensity as identified in its 2017 Power Strategic Long-Term Resource Plan (LADWP 2017). The plan provides the Los Angeles Department Water and Power with a 20-year roadmap for supplying reliable electricity in an environmentally responsible and cost-effective manner. The carbon intensity identified in the plan was extrapolated to represent the year 2022, the first year of operation for the Typical Projects, based on the State's long-term renewable energy procurement goals (i.e., SB 100).[4]

For purposes of analysis, the vehicle emissions estimated by CalEEMod were adjusted to assume implementation of the Final SAFE Rule, which would increase passenger vehicle emissions of GHGs in future years. The adjustment factors are based on CARB (2020c) guidance.

3.7.3.2 Criteria for Determining Significance

Thresholds of Significance

For the purposes of the analysis in this PEIR, and in accordance with Appendix G of the State CEQA Guidelines, the proposed Project would have a significant environmental impact if it would:

3.7(a) Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

3.7(b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

The State CEQA Guidelines Section 15064.4 provides guidance to lead agencies in determining the significance of GHG emissions and determining the appropriate methodology to assess a project's incremental contribution to climate change. The California Supreme Court's decision in *Center for Biological Diversity v. Department of Fish and Wildlife, the Newhall Land and Farming Company* (62 Cal.4th 204) confirmed that there are multiple potential pathways for evaluating GHG emissions consistent with CEQA. Several air quality management agencies throughout the State have also drafted or adopted varying threshold approaches and guidelines for analyzing GHG emissions in CEQA documents.

Common threshold approaches include (1) compliance with a qualified GHG reduction strategy, (2) performance-based reductions, (3) numeric "bright-line" thresholds, (4) efficiency-based thresholds, and (5) compliance with regulatory programs. These potential threshold approaches were reviewed for potential applicability to the Project.

The *2020 LA River Master Plan* would be implemented over a 25-year period through 2045. There are currently no adopted quantitative thresholds relevant to the Project. The County has not drafted

[4] Development proposed under the *2020 LA River Master Plan* any time after 2022 would have a lower carbon intensity from electricity than that used in this analysis given the State's increasing RPS.

or adopted threshold approaches and guidelines for analyzing GHG emissions and climate change in CEQA documents. Although the County adopted its 2020 CCAP in 2015, the plan was prepared to comply with the 2020 GHG reduction goal established by AB 32, and therefore would not be applicable to use in evaluating GHG emissions of the proposed Project beyond the 2020 timeframe. Consequently, the GHG emissions analysis for the proposed Project herein cannot rely on a qualitative tiering analysis with the County's 2020 CCAP. Additionally, SCAQMD has adopted bright-line numeric significance threshold levels for industrial, residential, commercial, and mixed-use projects. However, like the County's 2020 CCAP, these thresholds were based on compliance with the 2020 GHG reduction goal established by AB 32, and therefore would not be applicable to use in evaluating GHG emissions of the proposed Project beyond 2020 (Sacramento Metropolitan Air Quality Management District 2014).

GHG emissions from the Project are evaluated on a sector-by-sector (e.g., energy, water) basis using the most applicable regulatory programs, policies, and thresholds recommended by CARB and the OPR, as described below ("(5) compliance with regulatory programs" approach mentioned above as a common threshold). The buildout year for the *2020 LA River Master Plan* is 2045. The State has a reduction goal of carbon neutrality set by EO B-55-18. However, the State's goal has not been codified in law, and neither the State nor the 18 jurisdictions within the study area have adopted a plan or framework to achieve the 2045 reduction goal. The State's 2030 target has been codified in law through SB 32 and the 2017 Scoping Plan adopted to meet this goal. Therefore, 2030 marks the next statutory statewide milestone target applicable to the Project. The analysis focuses on the 2030 target and the plans, policies, and regulations adopted pursuant to achieving 2030 reductions. Where applicable, guidance from CARB, OPR, and other agencies related to long-term emission reduction requirements is incorporated into the analysis.

- **Mobile sources**: federal, State, and local regulatory efforts target three elements of emissions reduction from mobile sources: vehicle fuel efficiency, the carbon content of fuels, and VMT. Most adopted programs and regulations focus on fuel efficiency (e.g., Corporate Average Fuel Economy Standards, Pavley standards) and reducing the carbon intensity of transportation fuels (e.g., LCFS). Vehicle electrification is also rapidly becoming part of the State's approach to reducing mobile-source emissions (e.g., electric vehicle charging infrastructure requirement). SB 743 is intended to close the VMT and emissions reduction gap in the mobile-source sector. OPR (2018a) and CARB (2019c) have released guidance that establish VMT reduction targets needed to meet statewide GHG planning goals through 2030.
- Consistent with OPR and CARB guidance for meeting statewide GHG planning goals, Los Angeles County has approved an update to the Transportation Impact Analysis Guidelines that includes, for SB 743 purposes, a VMT threshold as determined on a project-by-project basis based on guidance provided by CARB[5] and OPR[6]. The draft guidelines also specify screening criteria to exempt projects from conducting a VMT analysis if (1) they are located within a half mile of a major transit stop or along a major transit corridor and if (2) they meet certain other criteria (OPR 2018a). Because transit stop locations can change over time and the screening eligibility is based on proximity to transit, these screening criteria are inapplicable to the Project; however, other screening criteria as referenced in OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018, may be applicable. Mobile-source emissions would be

[5] As referenced by the VMT reduction goals discussed in the 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Goals, January 2019, Figure 3.

[6] As referenced in OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA*, December 2018.

considered less than significant as determined on a project-by-project basis based on the SB 743 guidance provided by CARB and OPR. In addition, compliance with other regulatory programs (e.g., AB 1493, LCFS and SB 375) would be required to reduce the statewide mobile GHG emissions for a less-than-significant impact.

- **Energy, water, waste, area, and land sources.** CARB's 2017 Scoping Plan, which relies heavily on State programs (e.g., Title 24 and SB 100), outlines strategies required to reduce statewide GHG emissions in order to achieve California's SB 32 reduction target. Projects that implement applicable strategies from the 2017 Scoping Plan would be consistent with the State's GHG reduction framework and requirements for these sectors. Accordingly, a sector-by-sector review of the respective project features and measures included in the Project is provided to evaluate consistency with the 2017 Scoping Plan. This assessment also considers recent OPR (2018b) guidance related to the long-term reduction of statewide emissions. Accordingly, energy, water, waste, area, and land use source emissions would be considered less than significant if the Project is consistent with all applicable 2017 Scoping Plan strategies and supporting regulations and guidance.

Note that GHGs and climate change are exclusively cumulative impacts; there are no non-cumulative GHG emissions impacts from a climate change perspective (CAPCOA 2008). Therefore, in accordance with the scientific consensus regarding the cumulative nature of GHGs, the analysis herein analyzes the cumulative contribution of project-related GHG emissions, with amortized construction emissions added to annually calculated operational emissions for evaluation of the Project's total GHG emissions.

3.7.3.3 Impacts and Mitigation Measures

Impact 3.7(a): Would the proposed Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

As discussed above, emissions associated with the six KOP categories and related design components—as well as the *2020 LA River Master Plan* in its entirety—are analyzed qualitatively at a program level. The two Typical Projects, the Common Elements and the Multi-Use Trails and Access Gateways, are analyzed in greater detail than the other elements based on the design components for which Public Works could make reasonable and informed construction and operations assumptions. The quantification of emissions is presented for informational purposes, as there are no bright-line numeric thresholds applicable to the Project. Instead, the significance determination of GHG emissions from the Project is based on a sector-by-sector analysis using the most applicable regulatory programs, policies, and thresholds recommend by CARB and OPR. As project emissions would not vary based on the planning frame and the regulatory programs analyzed are not specific to any one frame, this analysis would apply equally to projects in all nine frames.

Typical Projects

Common Elements

Construction

Construction of the Common Elements Typical Project would generate GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. As mentioned above in Section 3.7.3.2, *Criteria for Determining Significance*, of this PEIR, GHG emissions are measured exclusively as cumulative impacts; therefore, the Common Elements Typical Project's construction emissions are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations. In accordance with SCAQMD guidance, the Project's construction emissions are amortized over a 30-year period, and the resulting annual emissions are combined with the Project's annual operational GHG emissions.

Construction of the Common Elements Typical Project is estimated to generate a total of 304 $MTCO_2e$ over the 19-month construction period. When amortized over a 30-year period, the construction GHG emissions from the Common Elements Typical Project would be approximately 10 $MTCO_2e$ per year. It should be noted that total and annual construction GHG emissions represent a conservative assessment because GHG emissions would decrease in future years as the construction industry shifts toward implementation of cleaner fuels (i.e., electrified equipment) and more efficient technologies. As such, the annual construction GHG emissions associated with the Common Elements Typical Project would decrease with time and are likely to be lower than assumed herein.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

Operations of the Common Elements Typical Project would result in GHG emissions from multiple sources, including energy, mobile, area, water, wastewater, and waste, as further described below.

Table 3.7-4 presents the GHG emissions from implementation of the Common Elements Typical Project, which include the amortized construction emissions and annual operation emissions.

Table 3.7-4. Annual GHG Emissions Associated with the Common Elements Typical Project

Source	$MTCO_2e$
Operations	
Area	<1
Energy	222
Mobile	4,464
Waste	46
Water/Wastewater	31
Subtotal of Operations	4,764
Subtotal of Amortized Construction	10
Total	4,774

Source: Emissions estimates using CalEEMod version 2016.3.2 (see Appendix C of this PEIR).

As shown, implementation of the Common Elements Typical Project would result in annual GHG emissions of 4,774 $MTCO_2e$.

The quantification of emissions is presented solely for informational purposes. The significance determination of this impact is based on the following sector-by-sector analysis of the respective project features and measures to evaluate consistency with the 2017 Scoping Plan strategies and supporting regulations and guidance.

Energy

GHGs are emitted directly from buildings through the combustion of any type of fuel (e.g., natural gas for cooking). GHGs are also emitted indirectly from buildings through the use of upstream fossil fuels to provide electricity. It is anticipated that the pavilion buildings of the Common Elements Typical Project would use electricity and require natural gas appliances. The Common Elements Typical Project would also include continuous outdoor lighting.

The OPR 2018 *CEQA and Climate Change Advisory* recommends that a land use development project that "achieves applicable building energy efficiency standards, uses no natural gas or other fossil fuels, and includes ENERGY STAR appliances where available, may be able to demonstrate a less-than-significant greenhouse gas impact associated with project operation" (OPR 2018b).

Development under the Common Elements Typical Project would comply with all applicable local and State building measures at the time of their development, including Title 24, Part 6, California Energy Code baseline standard requirements for energy efficiency, commonly referred to as CALGreen (California Code of Regulations, Part 11). Implementation of State and local measures (e.g., SB 100) would also reduce GHG emissions associated with electricity in future operations years. Relative to the energy emissions estimated in Table 3.7-4, the portion of GHG emissions associated with electricity use would decrease annually in future years from statewide implementation of SB 100, which sets an RPS target of 60 percent by 2030 and 100 percent by 2045. Because SB 100 obligates utilities to supply 100 percent carbon-free electricity by 2045, all electric buildings that do not consume any natural gas would not generate any emissions.

The *2020 LA River Master Plan* Design Guidelines (Design Guidelines; as described in Chapter 2, Project Description, and included in Appendix B) for the pavilions recommend that the following best practices be incorporated to reduce energy consumption: use of renewable energy sources; optimized building orientation for solar exposure, diffused daylight, and passive ventilation; high thermal performance; energy efficient appliances; high-albedo roof and paving materials to mitigate heat gain; and green roof and pervious paving. In addition to the mandated CALGreen building measures, other building standards from where energy best practices could be recommended include the United States Green Building Council's Leadership in Energy and Environmental Design (LEED), United States Department of Energy Better Buildings Initiative, ENERGY STAR, Dark Sky, Cradle-to-Cradle, and Green Globes. The Design Guidelines for the lighting elements require use of LED or a more efficient light source and use of solar-power light fixtures along the river, wherever possible. While the Design Guidelines address the need for energy-efficient appliances, besides the requirements for outdoor lighting, they are not required and the decision to implement them would be determined by the subsequent project proponent. Furthermore, the Design Guidelines do not address the use of natural gas in the buildings. Therefore, the Common Elements Typical Project potentially could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan.

Mobile

GHG emissions associated with on-road mobile sources would be generated from workers, visitors, and delivery vehicles visiting the project site. The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across the County for cyclists, pedestrians, and equestrians, and intends to accommodate as many user types as safely possible. It is likely that a portion of the vehicle trips associated with operations of the Common Elements Typical Project would be displaced by other modes, such as pedestrian and cyclist trips. The Common Elements Typical Project includes installation of bike racks at all project sites or at set intervals along the LA River Trail. This biking infrastructure would help promote cyclist trips in place of vehicle trips.

Vehicles associated with operation of the Common Elements Typical Project would not conflict with the State's regulatory programs related to vehicle fuel efficiency and the carbon content of fuels (e.g., LCFS, Pavley Standards).

As discussed above, the County will evaluate whether a project complies with SB 743 on a project-by-project basis based on guidance provided by CARB and OPR that is consistent with meeting the long-term GHG reduction goals of the 2017 Scoping Plan. As discussed in Section 3.16, *Transportation*, two specific components of the Common Elements Typical Project, Tier III Pavilions and Art/Performance Spaces, were determined to have the potential to generate a significant VMT impact because they could conflict with or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b), which deals with compliance with SB 743. Therefore, the Common Elements could affect the State's ability to meet its mobile source GHG reduction targets and could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan.

Area

Area-source GHG emissions from the Common Elements Typical Project would be generated by gasoline-powered landscaping equipment (e.g., trimmers, mowers). Area-source emissions are based on CalEEMod's default assumptions and represent a conservative estimate of equipment usage, according to the square footage of the proposed building space. Landscaping would include primarily trees, shrubs and pervious pavement, as opposed to grassed areas, thereby minimizing the routine use of mowers and other landscaping equipment.

The 2017 Scoping Plan does not include specific measures for landscaping equipment. OPR (2018b) guidance recommends that land use development projects strive to avoid fossil fuels. Because the landscaping equipment would be fueled with gasoline, the Common Elements Typical Project potentially could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan.

Land Use

The 2017 Scoping Plan has an overall goal of avoiding losses in carbon sequestration. Although the emissions benefit was not quantified, the Common Elements Typical Project would include planting of vegetation that would sequester carbon. The Design Guidelines for ecology and planting describe the best practices that would sequester carbon emissions: provide continuous native tree and plant corridor along the river with linkages to riparian habitat and upland areas near the river; support nurseries and organizations that specifically collect and propagate indigenous native plant species for planting along the river corridor; and study project sites to identify optimal locations and possible grading actions to increase capture and retention of rainfall to help sustain the growth of native plantings. Because the Common Elements Typical Project includes plantings that could be

further supported by the Design Guidelines, the Common Elements Typical Project would be consistent with the 2017 Scoping Plan's goal of avoiding losses in carbon sequestration.

Water Use and Wastewater Generation

Indirect GHG emissions result from the production of electricity used to convey, treat, and distribute water and wastewater. The amount of electricity required to convey, treat, and distribute water depends on the volume of water as well as the sources of water. Additional wastewater emissions include CH_4 and N_2O, although these are generated by wastewater treatment at individual wastewater treatment plants. The Common Elements Typical Project does not include any new wastewater treatment plants.

The 2017 Scoping Plan outlines objectives and goals to reduce GHGs in the water sector, including using and reusing water more efficiently through greater water conservation, drought-tolerant landscaping, stormwater capture, and water recycling. Regulations have further targeted water supply and water conservation (e.g., SB X7-7) through building and landscaping efficiency (e.g., Title 24).

The Design Guidelines for the pavilions recommend the following best practices that should be incorporated to reduce water consumption: on-site water retention, detention, and filtration; capture of 100 percent of on-site rainfall for the 85 percent rain event; greywater and rainwater reuse; and low-flow water fixtures. These features, if implemented, would be consistent with the 2017 Scoping Plan's water measures and the State's regulatory programs within the water sector. However, because these Design Guidelines are not required and the decision to implement them would be determined by the subsequent project proponent, the Common Elements Typical Project potentially could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan.

Waste Generation

Solid waste may be disposed of in landfills or diverted for recycling, composting, or reuse. GHG emissions from landfills are generated through anaerobic breakdown of material. The 2017 Scoping Plan aims to reduce waste emissions by diverting waste away from landfills through waste reduction, reuse, composting, and material recovery. In addition, AB 341 and AB 1826 require certain commercial business provide organics and recycling containers adjacent to trash to collect waste. The California Integrated Waste Management Act of 1989 requires that each local jurisdiction in the State divert 50 percent of all solid waste from disposal through measures including recycling and reuse. The County Construction and Demolition Debris Ordinance requires that at least 50 percent of all soil, rock, gravel, and construction and demolition debris removed from the project site be recycled or reused. Any organic waste, including landscaping waste, vegetation waste, or construction/demolition debris, will need to be diverted from landfill disposal, as required by SB 1383 regulations. The Common Elements Typical Project would be required to comply with the State's regulatory programs within the waste sector.

The Common Elements Typical Project includes dual trash/recycling bins. The Design Guidelines for the pavilions recommend the following best practices to reduce waste generation: use locally sourced, recycled, and recyclable materials with low-embodied energy; green cleaning and integrated building management; and regular monitoring of building systems and usage optimization. These features, if implemented, would be consistent with the 2017 Scoping Plan's waste measures. However, because these Design Guidelines are not required and the decision to implement them would be determined by the subsequent project proponent, the Common Elements

Typical Project potentially could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan.

Summary

As described above, the Common Elements Typical Project would be consistent with the 2017 Scoping Plan's overall goal of avoiding losses in carbon sequestration and limiting land use emissions. The Design Guidelines for the Common Elements Typical Project related to water, energy, and waste, if implemented, would be consistent with the 2017 Scoping Plan's measures and the State's regulatory programs within these sectors. However, while the County would encourage implementation of the Design Guidelines, there is no guarantee that any of these measures will be incorporated into the design of the Common Elements Typical Project given that they are not required and the decision to implement them would be determined by the subsequent project proponent. Furthermore, it is anticipated that buildings would use natural gas and landscaping equipment would be gasoline powered, both of which are inconsistent with OPR (2018b) guidance. In addition, daily vehicle trips would exceed OPR's (2018a) daily trip screening threshold. Consequently, while emissions from the land use sector would generally be consistent with the 2017 Scoping Plan, emissions from the energy, mobile, area, water, and waste sectors would be potentially inconsistent with the 2017 Scoping Plan and applicable regulatory programs. Therefore, emissions associated with the construction and operation of the Common Elements Typical Project may have a potentially significant impact on the environment.

Impact Determination

Impacts for construction and operations would be potentially significant.

Mitigation Measures

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Implementing agencies will require implementation of the following GHG emissions reduction strategies:

- **Energy**
    - **Energy-efficient Appliances in Buildings.** New construction will use only ENERGY STAR rated appliances for appliance types that are offered ENERGY STAR ratings.
    - **Electric Space and Water Heating for Buildings.** New construction will employ electric and water heating. Where natural gas appliances need to be installed, these appliances will be an ENERGY STAR certified gas water heater) or be powered by renewable natural gas.
    - **Building Energy.** New construction will implement one or more of the Design Guidelines related to building energy consumption.
        - Use renewable energy sources (solar, wind, water, and renewable natural gas).
        - Optimize building orientation for solar exposure, diffused daylight, and passive ventilation.
        - Optimize high thermal performance.

        - Use high-albedo roof and paving materials to mitigate heat gain.
        - Use green roof and pervious paving.
        - Implement building energy best practices from the following standards: United States Green Building Council's LEED, United States Department of Energy Better Buildings Initiative, ENERGY STAR, Dark Sky, Cradle-to-Cradle, and Green Globes.

- **Area**
    - **Electric Landscaping Equipment.** Maintenance and operations activities that use landscaping equipment (e.g., lawn mowers, trimmers) for new construction will employ electric landscaping equipment.
- **Water Use**
    - **Water Conservation and Efficiency.** New construction will implement one or more of the Design Guidelines related to indoor and outdoor water conservation and efficiency.
        - Install systems for on-site water retention, detention, and filtration.
        - Capture 100 percent of on-site rainfall for the 85 percent rain event.
        - Reuse rainwater and greywater.
        - Create bioswales or treatment basins to collect stormwater runoff.
        - Install low-flow water fixtures that exceed the requirements of codes and ordinances.
            - Public bathroom faucet aerators with a flow rate of 0.4 gallon per minute
            - Rotating sprinkler nozzles for landscape irrigation 0.5 to 1.0 gallons per minute, or
            - Drip/subsurface irrigation (i.e., micro-irrigation)
- **Wastewater Generation**
    - **Waste Reductions.** New construction will implement one or more of the Design Guidelines related to minimization and recycling of waste generation.
        - Use locally sourced, recycled, and recyclable materials with low-embodied energy.
        - Use green cleaning products and integrated building management.
        - Regularly monitor building systems and optimize usage.

As discussed in Section 3.16, *Transportation*, the Common Elements Typical Project was determined to have the potential to generate a significant VMT impact. If, as part of Mitigation Measure TRA-1a, the subsequent project cannot be screened out using the County's VMT impact criteria and the VMT is determined to exceed the threshold based on applicable guideline and project type, then Mitigation Measure TRA-1b will be implemented.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure, which is described in Section 3.16, *Transportation*, would require implementation of a project-specific program utilizing transportation demand management (TDM)

strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operations would be significant and unavoidable.

With implementation of Mitigation Measure GHG-1a, compliance with a minimum of the Design Guidelines for the Common Elements Typical Project related to water, energy, and waste would be required for all new construction. Mitigation would also require electrified buildings and landscaping equipment. Mitigation Measure TRA-1b would require various TDM measures to reduce VMT, which would reduce mobile-source emissions. Nonetheless, given the range in the possible size and programmatic intensity of the project elements/design significant VMT impacts may not be fully mitigated even with TDM measures. Consequently, while emissions from the land use, energy, area, water, and waste sectors would generally be consistent with the 2017 Scoping Plan with implementation of mitigation, emissions from the mobile sector would be inconsistent with the 2017 Scoping Plan and applicable regulatory programs. No other feasible mitigation measures that would reduce mobile-source VMT emissions to a less-than-significant level are available at this time. Therefore, emissions associated with the Common Elements Typical Project would have a significant impact on the environment, and this impact would be significant and unavoidable.

Multi-Use Trails and Access Gateways

Construction

Construction of the Multi-Use Trails and Access Gateways Typical Project would generate GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. As mentioned above in Section 3.7.3.2, *Criteria for Determining Significance*, GHG emissions are measured exclusively as cumulative impacts; therefore, the Multi-Use Trails and Access Gateways Typical Project's construction emissions are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations. In accordance with SCAQMD guidance, the Multi-Use Trails and Access Gateways Typical Project's construction emissions are amortized over a 30-year period, and the resulting annual emissions are combined with the Multi-Use Trails and Access Gateways Typical Project's annual operational GHG emissions.

Construction of the Multi-Use Trails and Access Gateways Typical Project is estimated to generate a total of 1,065 $MTCO_2e$ over the estimated 20-month construction period. When amortized over a 30-year period, the construction GHG emissions from the Multi-Use Trails and Access Gateways Typical Project would be approximately 36 $MTCO_2e$ per year. It should be noted that total and annual construction GHG emissions represent a conservative assessment because GHG emissions would decrease in future years as the construction industry shifts toward implementation of cleaner fuels (i.e., electrified equipment) and more efficient technologies. As such, the annual construction GHG emissions associated with the Multi-Use Trails and Access Gateways Typical Project would decrease with time and are likely to be lower than assumed herein.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

Project operations would result in GHG emissions from multiple sources of emissions, including energy, mobile, area, water, wastewater, and waste.

Table 3.7-5 presents the GHG emissions from implementation of the Multi-Use Trails and Access Gateways Typical Project, which include the amortized construction emissions and annual operation emissions.

Table 3.7-5. Estimated Annual GHG Emissions Resulting from the Multi-Use Trails and Access Gateways Typical Project

Source	$MTCO_2e$
Operations	
Area	<1
Energy	0
Mobile	215
Waste	1
Water/Wastewater	122
Subtotal of Operations	338
Subtotal of Amortized Construction	36
Total	373

Source: Emissions estimates using CalEEMod version 2016.3.2 (see Appendix C of this PEIR).

As shown, implementation of the Multi-Use Trails and Access Gateways Typical Project would result in annual GHG emissions of 373 $MTCO_2e$. The quantification of emissions is presented solely for informational purposes. The significance determination of this impact is based on the sector-by-sector consistency analysis with the 2017 Scoping Plan strategies and supporting regulations and guidance, consistent with OPR and CARB recommendation. The sector-by-sector analysis findings for the Multi-Use Trails and Access Gateways Typical Project are similar to those for the Common Elements Typical Project. A summary of the analysis and key differences between the types of emission sources between the two Typical Projects is presented below.

Summary of Energy, Mobile, Area, Land Use, Water, Waste

The Multi-Use Trails and Access Gateways Typical Project does not include any buildings or infrastructure that would consume electricity or natural gas. Therefore, the 2017 Scoping Plan's energy measures and the State's regulatory programs within the energy sector are not applicable.

As discussed in Section 3.16, *Transportation*, unlike the Common Elements Typical Project, the Multi-use Trails and Access Gateways Typical Project would result in a less than significant VMT impact and therefore would not affect the State's ability to meet its mobile source GHG reduction targets. The Multi-Use Trails and Access Gateways Typical Project would include a vegetative buffer (e.g., shrubs, grasses, trees) along the trails and therefore be consistent with the 2017 Scoping Plan's overall goal of avoiding losses in carbon sequestration and limited land use emissions. The Design Guidelines described above under the Common Elements Typical Project related to water would apply to the Multi-Use Trails and Access Gateways Typical Project, except for the following guideline related to fixtures: low-flow water fixtures. The Design Guidelines described above under the Common Elements Typical Project related to waste would also apply, except for the following

guideline related to buildings: use green cleaning products and integrated building management, and regularly monitor building systems and optimize usage. The applicable Design Guidelines for the Common Elements Typical Project related to water and waste, if implemented, would be consistent with the 2017 Scoping Plan's measures and the State's regulatory programs within these sectors. However, while the County would encourage implementation of the Design Guidelines, there is no guarantee that all of these measures will be incorporated into the design of the Multi-Use Trails and Access Gateways Typical Project, given that they are not required and the decision to implement them would be determined by the subsequent project proponent. Furthermore, landscaping equipment would be gasoline powered, which is inconsistent with OPR (2018b) guidance.

Consequently, while emissions from the land use and mobile sector would generally be consistent with the 2017 Scoping Plan, emissions from the area, water, and waste sectors would be potentially inconsistent with the 2017 Scoping Plan and applicable regulatory programs. Therefore, construction and operation emissions associated with the Multi-Use Trails and Access Gateways Typical Project may have a potentially significant impact on the environment.

Impact Determination

Impacts for construction and operations would be potentially significant.

Mitigation Measures

Mitigation Measure GHG-1a, as discussed above for the Common Elements Typical Project, applies to this impact. However, as the Multi-Use Trails and Access Gateways Typical Project would not result in any building energy consumption, the GHG reduction strategies of Mitigation Measure GHG-1a related to energy-efficient appliances in buildings and electric space and water heating for buildings do not apply. The Design Guidelines described above under the Common Elements Typical Project related to water fixtures and building waste, as made mandatory through implementation of Mitigation Measure GHG-1a, also do not apply to the Multi-Use Trails and Access Gateways Typical Project. The mitigation measure applicable to this Typical Project, Mitigation Measure GHG-1b, is as follows.

Mitigation Measure GHG-1b: Implement Operations GHG Emissions Reduction Strategies Specific to Emission Sources of Multi-Use Trails and Access Gateways.

Implementing agencies will require implementation of the following GHG emissions reduction strategies:

- **Area**
    - **Electric Landscaping Equipment.** Maintenance and operations activities that use landscaping equipment (e.g., lawn mowers, trimmers) for new construction will employ electric landscaping equipment.
- **Water Use**
    - **Water Conservation and Efficiency.** New construction will implement one or more of the Design Guidelines related to indoor and outdoor water conservation and efficiency.
        - Install systems for on-site water retention, detention, and filtration.
        - Capture 100 percent of on-site rainfall for the 85 percent rain event.

        - Reuse rainwater and greywater.
        - Install low-flow water fixtures that exceed the requirements of codes and ordinances:
            - Rotating sprinkler nozzles for landscape irrigation 0.5 to 1.0 gallons per minute, or
            - Drip/subsurface irrigation (i.e., micro-irrigation)
- **Wastewater Generation**
    - **Waste Reductions.** New construction will implement one or more of the Design Guidelines related to minimization and recycling of waste generation.
        - Use locally sourced, recycled, and recyclable materials with low-embodied energy.
        - Recycle construction waste.

Significance after Required Mitigation

With implementation of Mitigation Measure GHG-1b, the Design Guidelines related to water and waste would be required for all new construction. Mitigation would also require electrified landscaping equipment. Consequently, emissions from the area, land use, water, mobile, and waste sectors would generally be consistent with the 2017 Scoping Plan, Therefore, construction and operation emissions associated with the Multi-Use Trails and Access Gateways Typical Project would be less than significant with mitigation for later activities when carried out by the County.

Impacts would be significant and unavoidable for projects for later activities when not carried out by the County.

2020 LA River Master Plan Kit of Parts

The Common Elements Typical Project analyzed above could be implemented in whole or as a combination of its individual elements with all the KOP categories discussed below. Therefore, for potential impacts of the Common Elements Typical Project, see above. The impact discussion below focuses on specific KOP categories only.

As discussed above, the wide-ranging functions, characteristics, and complexity of the KOPs and their respective design components—along with the lack of specific sites or detailed design information—make it particularly challenging to make informed assumptions about reasonable construction and operations scenarios for these elements of the *2020 LA River Master Plan*. The specific location (in-channel/off-channel, frame, etc.) and design details of these subsequent projects would depend on numerous factors, including the proponent of subsequent projects, the implementing agency, community needs, policy decisions, and availability of funding. Accordingly, the six KOP categories are qualitatively analyzed at a high level for this impact. The significance determination of this impact is based on the sector-by-sector consistency analysis with the 2017 Scoping Plan strategies and supporting regulations and guidance.

KOP Category 1

Certain design components of KOP Category 1 inform the Multi-Use Trails and Access Gateways Typical Project analyzed above in more detail. Therefore, for potential construction and operation

impacts of these design components, see above. The design components analyzed in this section include those listed in Section 2.5.1 under the *KOP Category 1: Trails and Access Gateways* heading.

The specific location (in-channel/off-channel, frame, etc.) and design details for construction and operation of KOP Category 1 are currently unknown. Projects under KOP Category 1 would likely be substantially larger than the Typical Projects.

Construction

Construction of KOP Category 1 would generate GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. Because details about KOP Category 1 are unknown, GHG emissions associated with construction and operations activities have not been quantified. As mentioned above in Section 3.7.3.2, *Criteria for Determining Significance*, GHG emissions are measured exclusively as cumulative impacts; therefore, the construction emissions of KOP Category 1 are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

It is anticipated that project operations would result in GHG emissions from multiple sources, including energy at the equestrian facilities and light towers, mobile-source emissions from visitor and maintenance vehicle trips, area-source emissions from landscaping equipment used in habitat corridors, water from irrigation of the habitat corridor and use in the water tower, and waste at the equestrian facility. Many of the design components of KOP Category 1 (e.g., lookouts, boardwalks, vegetated buffer) are passive (i.e., no emissions are associated with them) and therefore would not likely generate substantial amounts of GHG emissions during operations. However, specific site locations and detailed design information are not known. It is, however, assumed that development under KOP Category 1 would be greater than what could occur under either of the Typical Projects given the potential for KOP Category 1 to incorporate multiple design components. Furthermore, as discussed in Section 3.16, *Transportation*, the equestrian facility design component of KOP Category 1 was determined to have the potential to generate a significant VMT impact. Therefore, KOP Category 1 could affect the State's ability to meet its mobile source GHG reduction targets and could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan. The GHG emissions from non-mobile sectors could also potentially conflict with applicable sector-specific reduction targets and strategies. Therefore, the construction and operation emissions associated with KOP Category 1 may have a potentially significant impact on the environment.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measure, which is described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Subsequent project-level analyses will identify the appropriate strategies from Mitigation Measure GHG-1a for their projects. For example, if, at the time specific project details are known, it can be stated with certainty that KOP Category 1 would not result in emissions associated with a particular sector (e.g., area) outlined in Mitigation Measure GHG-1a, then the corresponding mitigation for that sector (e.g., electric landscaping equipment) would not need to be implemented for KOP Category 1.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program using TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measure GHG-1a and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project design details (e.g., sustainability features, expected VMT, electricity and natural gas consumption), it cannot be stated with certainty that KOP Category 1 would comply with the long-term GHG reduction targets and goals of applicable regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 2

Construction

Construction of KOP Category 2 would generate GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. Because details about KOP Category 2, including location and design, are unknown, GHG emissions associated with construction and operations activities have not been quantified. As mentioned above in Section 3.7.3.2, *Criteria for Determining Significance*, of this PEIR, GHG emissions are measured exclusively as cumulative impacts; therefore, the construction emissions of KOP Category 2 are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

All of the design components of KOP Category 2 are passive (i.e., no emissions are directly associated with operation) and therefore KOP Category 2 would result in only a minor amount of direct GHG emissions during operations. However, recreation uses of KOP Category 2 design components (such as amphitheaters and parks) could result in emissions from energy sources (e.g., outdoor lighting),

water use requiring energy (e.g., conveyance and distribution), wastewater generation, or waste generation.

It is assumed that development under KOP Category 2 would be greater than either of the Typical Projects given the potential for KOP Category 2 to incorporate multiple design components. Furthermore, as discussed in Section 3.16, *Transportation*, the terraced banks design component of KOP Category 2 was determined to have the potential to generate a significant VMT impact. Therefore, KOP Category 2 could affect the State's ability to meet its mobile source GHG reduction targets and could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan. The GHG emissions from non-mobile sectors could also potentially conflict with applicable sector-specific reduction targets and strategies. Therefore, the construction and operation emissions associated with KOP Category 2 may have a potentially significant impact on the environment.

Impact Determination:

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measure, which is described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Subsequent project-level analyses will identify the appropriate strategies from Mitigation Measure GHG-1a for their projects. For example, if, at the time specific project details are known, it can be stated with certainty that KOP Category 2 would not result in emissions associated with a particular sector (e.g., area) outlined in Mitigation Measure GHG-1a, then the corresponding mitigation for that sector (e.g., electric landscaping equipment) would not need to be implemented for the KOP Category 2.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program using TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1a and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project design details (e.g., sustainability features, expected VMT, electricity and natural gas consumption), it cannot be stated with certainty that KOP Category 2 would comply with the long-term GHG reduction targets and goals of applicable regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 3

Construction

Construction of KOP Category 3 would generate GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. Because details about KOP Category 3 are unknown, GHG emissions associated with construction and operations activities have not been quantified. As mentioned above in Section 3.7.3.2, *Criteria for Determining Significance*, of this PEIR, GHG emissions are measured exclusively as cumulative impacts; therefore, the construction emissions of KOP Category 3 are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

All of the design components of KOP Category 3 are passive (i.e., no emissions are directly associated with operation) and therefore KOP Category 3 would result in only a minor amount of direct GHG emissions during operations. It is anticipated that project operations would not include building energy or stationary sources (e.g., generators). However, recreational uses such as parks and recreational fields of KOP Category 3 design components (e.g., cantilever or platform) could include water use requiring energy (e.g., conveyance, distribution treatment), wastewater generation, or waste generation. Area-source landscaping equipment would be used for maintenance activities. It is assumed that development under KOP Category 3 would be greater than either of the Typical Projects given the potential for KOP Category 3 to incorporate multiple design components. Furthermore, as discussed in Section 3.16, *Transportation*, the platform design component of KOP Category 3 was determined to have the potential to generate a significant VMT impact. Therefore, KOP Category 3 could affect the State's ability to meet its mobile source GHG reduction targets and could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan. The non-mobile sector GHG emissions could also potentially conflict with applicable sector-specific reduction targets and strategies. Therefore, the construction and operation emissions associated with KOP Category 3 may have a potentially significant impact on the environment.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measure, which is described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Subsequent project-level analyses will identify the appropriate strategies from Mitigation Measure GHG-1a for their projects. For example, if, at the time specific project details are known, it can be stated with certainty that KOP Category 3 would not result in emissions associated with a particular

sector (e.g., area) outlined in Mitigation Measure GHG-1a, then the corresponding mitigation for that sector (e.g., electric landscaping equipment) would not need to be implemented for KOP Category 3.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1a and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project design details (e.g., sustainability features, expected VMT, electricity and natural gas consumption), it cannot be stated with certainty that KOP Category 3 would comply with the long-term GHG reduction targets and goals of applicable regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 4

Construction

Construction of KOP Category 4 would generate GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. Because details about KOP Category 4 are unknown, GHG emissions associated with construction and operations activities have not been quantified. As mentioned above in Section 3.7.3.2, *Criteria for Determining Significance*, of this PEIR, GHG emissions are measured exclusively as cumulative impacts; therefore, the construction emissions of KOP Category 4 are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

It is anticipated that project operations would not include building energy or stationary sources (e.g., generators). However, design components could include water use requiring energy and waste generation. Mobile sources could include intermittent vehicle trips from maintenance and repair workers. It is not anticipated that maintenance would occur at a high enough frequency or intensity that associated emissions would be significant. However, operation of KOP Category 4 would require an unknown amount of electricity during use of water pumps for diversion activities. It is assumed that development under KOP Category 4 would be greater than either of the Typical Projects given the potential for KOP Category 4 to incorporate multiple design components. Furthermore, as discussed in Section 3.16, *Transportation*, the side channel design component of

KOP Category 4 was determined to have the potential to generate a significant VMT impact. Therefore, KOP Category 4 could affect the State's ability to meet its mobile source GHG reduction targets and could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan. The non-mobile sector GHG emissions could also potentially conflict with applicable sector-specific reduction targets and strategies. Therefore, the construction and operation emissions associated with KOP Category 4 may have a potentially significant impact on the environment.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measure, which is described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Subsequent project-level analyses will identify the appropriate strategies from Mitigation Measure GHG-1a for their projects. For example, if, at the time specific project details are known, it can be stated with certainty that KOP Category 4 would not result in emissions associated with a particular sector (e.g., area) outlined in Mitigation Measure GHG-1a, then the corresponding mitigation for that sector (e.g., electric landscaping equipment) would not need to be implemented for KOP Category 4.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1a and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project design details (e.g., sustainability features, expected VMT, electricity and natural gas consumption), it cannot be stated with certainty that KOP Category 4 would comply with the long-term GHG reduction targets and goals of applicable regulatory programs. With mitigation, impacts would still remain significant and unavoidable.

KOP Category 5

Construction

Construction of KOP Category 5 would generate GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. Because details about KOP Category 5 are unknown, GHG emissions associated with construction and operations activities have not been quantified. As mentioned above in Section

3.7.3.2, *Criteria for Determining Significance*, of this PEIR, GHG emissions are measured exclusively as cumulative impacts; therefore, the construction emissions of KOP Category 5 are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

It is anticipated that project operations would not include building energy or stationary sources (e.g., generators). However, recreational uses, such as farmers markets and recreational fields of Category 5 design components (e.g., fields), would require outdoor lighting and result in waste generation. Mobile sources could include intermittent vehicle trips from maintenance and any area-source landscaping equipment used for maintenance activities. It is not anticipated that maintenance would occur at a high enough frequency or intensity that associated emissions would be significant. However, recreational uses could result in VMT and associated mobile emissions. It is assumed that development under KOP Category 5 would be greater than either of the Typical Projects given the potential for KOP Category 5 to incorporate multiple design components. Furthermore, as discussed in Section 3.16, *Transportation*, the fields and recreational fields design components of KOP Category 5 were determined to have the potential to generate a significant VMT impact. Therefore, KOP Category 5 could affect the State's ability to meet its mobile source GHG reduction targets and could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan.

The GHG emissions could also potentially conflict with applicable sector-specific reduction targets and strategies. Therefore, the construction and operation emissions associated with KOP Category 5 may have a potentially significant impact on the environment.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measure, which is described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Subsequent project-level analyses will identify the appropriate strategies from Mitigation Measure GHG-1a for their projects. For example, if, at the time specific project details are known, it can be stated with certainty that KOP Category 5 would not result in emissions associated with a particular sector (e.g., area) outlined in Mitigation Measure GHG-1a, then the corresponding mitigation for that sector (e.g., electric landscaping equipment) would not need to be implemented for KOP Category 5.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measure GHG-1a would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project design details (e.g., sustainability features, expected VMT, electricity and natural gas consumption), it cannot be stated with certainty that KOP Category 5 would comply with the long-term GHG reduction targets and goals of applicable regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 6

Construction

As mentioned above in Section 3.7.3.2, *Criteria for Determining Significance*, of this PEIR, GHG emissions are measured exclusively as cumulative impacts; therefore, the construction emissions of KOP Category 6 are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations. Because details about KOP Category 6 are unknown, GHG emissions associated with construction and operations activities have not been quantified.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

It is anticipated that project operations would result in GHG emissions from multiple sources, including building energy in affordable housing and cultural centers; mobile-source emissions from visitor and maintenance vehicle trips to all design components; area-source emissions from landscaping equipment used in urban agriculture/composting, fields, and parks; stationary sources associated with water treatment facilities; water irrigated for urban agriculture/composting, fields, and parks; wastewater used in the water treatment facilities; and waste from all design components. The lack of specific sites or detailed design information makes it particularly challenging to make informed assumptions about reasonable operations scenarios for KOP Category 6. It is assumed that development under KOP Category 6 would be greater than either of the Typical Projects given the potential for KOP Category 6 to incorporate multiple design components. Furthermore, as discussed in Section 3.16, *Transportation*, the design components of KOP Category 6 of recreation fields, urban agriculture/composting, and art and culture facilities were determined to have the potential to generate a significant VMT impact. Therefore, KOP Category 6 could affect the State's ability to meet its mobile source GHG reduction targets and could be inconsistent with the long-term GHG reduction goals of the 2017 Scoping Plan. The GHG emissions could also potentially conflict with applicable sector-specific reduction targets and strategies. Therefore, the construction and operation emissions associated with KOP Category 6 may have a potentially significant impact on the environment.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measure, which is described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Subsequent project-level analyses will identify the appropriate strategies from Mitigation Measure GHG-1a for their projects. For example, if, at the time specific project details are known, it can be stated with certainty that KOP Category 6 would not result in emissions associated with a particular sector (e.g., area) outlined in Mitigation Measure GHG-1a, then the corresponding mitigation for that sector (e.g., electric landscaping equipment) would not need to be implemented for KOP Category 6.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1a and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project design details (e.g., sustainability features, expected VMT, electricity and natural gas consumption), it cannot be stated with certainty that KOP Category 6 would comply with the long-term GHG reduction targets and goals of applicable regulatory programs. With mitigation, impacts would be significant and unavoidable.

Overall 2020 LA River Master Plan Implementation

As described in the *2020 LA River Master Plan*, it is anticipated that approximately 107 projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) would be implemented under the *2020 LA River Master Plan* over the 25-year period to meet the *2020 LA River Master Plan*'s nine objectives. These would include the Typical Projects that would be implemented along the river, and subsequent projects composed of the KOPs' multi-benefit design components. These elements together compose the entirety of the *2020 LA River Master Plan*.

Construction

Construction impacts of the overall *2020 LA River Master Plan* would be similar to those described for the KOP categories. As mentioned above in Section 3.7.3.2, *Criteria for Determining Significance*, of this PEIR, GHG emissions are measured exclusively as cumulative impacts; therefore, the construction emissions of the *2020 LA River Master Plan* are considered part of total GHG emissions for the project lifecycle, which also includes GHG emissions during operations.

The significance determination is based on the combined GHG emissions generated by both project construction activities and operations activities. See below for the combined construction and operations impact determination.

Operations

Operation of the overall *2020 LA River Master Plan* would involve GHG emissions from building natural gas use, stationary sources, worker and visitor vehicle trips, and other sources. Because details about the *2020 LA River Master Plan* construction and operation scenario are unknown, GHG emissions associated with the entirety of the *2020 LA River Master Plan* have not been quantified. Because development of the *2020 LA River Master Plan* represents all of the Typical Projects and KOP categories combined, the GHG emissions could also potentially conflict with applicable sector-specific reduction targets and strategies. Therefore, the construction and operation emissions associated with the *2020 LA River Master Plan* may have a potentially significant impact on the environment.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measure, which is described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Subsequent project-level analyses will identify the appropriate strategies from Mitigation Measure GHG-1a for their projects. For example, if, at the time specific project details are known, it can be stated with certainty that the KOP categories would not result in emissions associated with a particular sector (e.g., area) outlined in Mitigation Measure GHG-1a, then the corresponding mitigation for that sector (e.g., electric landscaping equipment) would not need to be implemented for the KOP categories.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1a and TRA-1bwould be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project design details (e.g., sustainability features, expected VMT, electricity and natural gas consumption), it cannot be stated with certainty that the *2020 LA River Master Plan* would comply with the long-term GHG reduction

targets and goals of applicable regulatory programs. With mitigation, impacts would be significant and unavoidable.

Impact 3.7(b): Would the proposed Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The plans relevant to the proposed Project that have been adopted for the purposes of reducing GHG emissions include the 2020 CCAP and the updated Los Angeles County CAP, OurCounty Sustainability Plan, City of Long Beach Climate Action and Adaptation Plan (CAAP), City of Carson CAP, City of Burbank CAP, SCAG's RTP/SCS, 2008 Scoping Plan and First Update, and 2017 Scoping Plan. The proposed Project's consistency with these plans is reviewed below. The cities' CAPs are only relevant to development that would occur in those jurisdictions, which overlap with one or more of the nine planning frames. The City of Long Beach CAAP is relevant to analyses in Frames 1 and 2, the City of Carson CAP in Frame 2, and the City of Burbank CAP in Frame 7. The other plans are relevant to all nine planning frames in the project area and are discussed below under the *All Frames* section. The impact analysis for Frames 1, 2, and 7 is separated to discuss the frame-specific CAPs.

AB 32 and SB 32 outline the State's GHG emissions reduction targets for 2020 and 2030, respectively. While not legislatively adopted, EO S-03-05 establishes the State's long-term goal to reduce GHG emissions 80 percent from 1990 levels by 2050. EO B-55-18 sets a more ambitious State goal of net zero GHG emissions by 2045.

In 2008 and 2014, CARB adopted the 2008 Scoping Plan and First Update, respectively, as a framework for achieving AB 32. The 2008 Scoping Plan and First Update outline a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. CARB adopted the 2017 Scoping Plan in November 2017 (updated in December 2017) as a framework to achieve the 2030 GHG reduction goal described in SB 32. There is no State plan for addressing GHG reductions beyond 2030.

Based on CARB's 2017 Scoping Plan, many of the reductions needed to meet the 2030 target will come from State regulations, including Cap-and-Trade, the requirement for increased renewable energy sources in California's energy supply, updates to Title 24, and increased emission-reduction requirements for mobile sources. The 2017 Scoping Plan indicates that reductions would need to come in the form of changes pertaining to vehicle emissions and mileage standards, changes pertaining to sources of electricity and increased energy efficiency at existing facilities, and State and local plans, policies, or regulations that will lower GHG emissions relative to business-as-usual conditions. The 2017 Scoping Plan carries forward GHG reduction measures from the First Update, as well as new potential measures to help achieve the State's 2030 target across all sectors of the California economy, including transportation, energy, and industry.

Typical Projects

Common Elements

All Frames

Consistency with 2008 Scoping Plan and First Update

AB 32 codifies the State's GHG emissions reduction targets for 2020. While operation of the Common Elements Typical Project could occur as soon as 2022, this is still beyond AB 32's 2020 target year. Consistency with the 2008 Scoping Plan is discussed primarily for informational purposes. For a comprehensive evaluation of GHG impacts, a discussion is needed with respect to the Common Elements Typical Project's consistency with guidance documents and regulations with timelines more consistent with the buildout years and beyond.

CARB adopted the 2008 Scoping Plan in 2008, incorporating its First Update (2014) as a framework for achieving the AB 32 targets. The 2008 Scoping Plan and First Update outline a series of technologically feasible and cost-effective measures for reducing statewide GHG emissions. Some reductions would require changes pertaining to vehicle emissions and mileage standards, some of which would result from changes to sources of electricity and increased energy efficiency at existing facilities. The remainder would need be based upon State and local plans, policies, or regulations that would lower carbon emissions, relative to business-as-usual conditions.

Plantings at the project site ensure that the Common Elements Typical Project would be consistent with the 2008 Scoping Plan and First Update's goal of avoiding losses in carbon sequestration and limiting land use emissions.

The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across Los Angeles County for cyclists, pedestrians, and equestrians, and intends to accommodate as many user types as safely possible. It is likely that a portion of the vehicle trips associated with operations of the Common Elements Typical Project would be displaced by other modes, such as pedestrian and cyclist trips. The Common Elements Typical Project includes installation of bike racks at all project sites or at set intervals along the LA River Trail. This biking infrastructure would help promote cyclist trips in place of vehicle trips, thereby directly addressing the 2008 Scoping Plan and First Update's overall goal of VMT reduction.

The Design Guidelines described above under the Common Elements Typical Project related to water, energy, and waste would minimize GHG emissions associated with future development through water and energy conservation, solid waste diversion, and use of renewable energy—all goals of the 2008 Scoping Plan and First Update. However, while the County would encourage implementation of the Design Guidelines, there is no guarantee that all of these measures will be incorporated into the design of the Common Elements Typical Project given that they are not required and the decision to implement them would be determined by the subsequent project proponent. Accordingly, the Common Elements Typical Project would be potentially inconsistent with strategies identified in the 2008 Scoping Plan and First Update, as well as statewide goals to improve energy efficiency, reduce building energy consumption, and increase renewable energy generation.

Consistency with 2017 Scoping Plan

Although the measures included in the 2017 Scoping Plan are necessarily broad, goals and desired outcomes of the First Update are identified as increasing energy efficiency, water conservation, waste diversion, transportation sustainability, etc. The consistency of the Common Elements Typical Project with the 2017 Scoping Plan's policies needed to achieve the 2030 GHG targets is presented in Table 3.7-6. As shown, the policies are not applicable to the Common Elements Typical Project, and thus consistency with these measures does not apply. Therefore, the Common Elements Typical Project would not conflict with or hinder the implementation of the policies in the 2017 Scoping Plan.

Table 3.7-6. Consistency of the Common Elements Typical Project with the 2017 Scoping Plan

Policy[a]	Primary Objective	Consistency Analysis
SB 350	Reduce GHG emissions in the electricity sector through the implementation of the 50 percent RPS, doubling of energy savings, and other actions as appropriate to achieve GHG emissions reductions planning targets in the IRP process.	This policy is a State program that requires no action at the local or project level and therefore does not apply to the Common Elements Typical Project.
LCFS	Transition to cleaner/less-polluting fuels that have a lower carbon footprint.	This policy is a State program that requires no action at the local or project level and therefore does not apply to the Common Elements Typical Project.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario)	Reduce GHGs and other pollutants from the transportation sector through transition to zero-emission and low-emission vehicles, cleaner transit systems and reduction of vehicle miles traveled.	This policy is a State program that requires no action at the local or project level and therefore does not apply to the Common Elements Typical Project.
SB 1383	Approve and Implement SLCP strategy to reduce highly potent GHGs.	This policy is a State program that may require action at the local or project level. Any organic waste, including landscaping waste, vegetation waste, or construction/demolition debris, will need to be diverted from landfill disposal as required by the SB 1383 regulations.
California Sustainable Freight Action Plan	Improve freight efficiency, transition to zero-emission technologies, and increase competitiveness of California's freight system.	This policy is a State program that requires no action at the local or project level and therefore does not apply to the Common Elements Typical Project.
Post-2020 Cap-and-Trade Program	Reduce GHGs across largest GHG emission sources.	This policy is a State program that requires no action at the local or project level and therefore does not apply to the Common Elements Typical Project.

[a] The 2017 Scoping Plan policies included in this table are those representing the State strategy for meeting the 2030 GHG target of SB 32.

Consistency with SB 32 and EO S-3-05

As discussed above, SB 32 adopted a GHG reduction target of 40 percent below 1990 levels by 2030, and EO S-3-05 established a long-term goal of reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used, which, if legislatively adopted, will require significant policy, technical, and economic solutions. Decarbonization of the transportation fuel supply will require that electric and plug-in hybrid electric vehicles compose the vast majority of light-duty vehicles, and will also require electrification or the use of alternative fuels for medium- and heavy-duty vehicles. Some changes, such as the use of alternative fuels (e.g., biofuels) to replace petroleum for aviation, cannot be accomplished without action by the federal government. Furthermore, achieving the 2050 GHG reduction goals will require California to dramatically increase the amount of electricity that is generated by renewable generation sources and, correspondingly, advance significantly the deployment of energy storage technology and smart-grid strategies, such as price-responsive demand and the smart charging of vehicles. This would entail a significant redesign of California's electricity system, which can only be accomplished through State action.

In evaluating the Common Elements Typical Project's emissions for consistency with SB 32 and EO S-3-05, it is important to note that many of these broad-scale shifts in how energy is produced and used are unknown at this time and ultimately outside of the scope of the Project. Consequently, the extent to which the Common Elements Typical Project's GHG emissions and resulting impacts would be mitigated through implementation of such statewide (or nationwide) changes is not known. Furthermore, implementation of such additional policy and regulatory changes lies within the jurisdiction of state-level agencies (e.g., CARB) and federal-level agencies, not the County or the proposed Project. However, some of the measures recommended as part of SB 32 and EO S-3-05 (e.g., decarbonization, energy efficiency, reduced fossil-fuel-based VMT) can be facilitated to some extent through implementation of specific GHG reduction measures at the project and program level.

The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across the County for cyclists, pedestrians, and equestrians. The Common Elements Typical Project includes installation of bike racks, which would help promote cyclist trips in place of vehicle trips, thereby reducing fossil-fuel-based VMT. The Design Guidelines for the Common Elements Typical Project related to water, energy, and waste would work toward decarbonization and energy efficiency through water and energy conservation, solid waste diversion, and use of renewable energy. However, while the County would encourage implementation of the Design Guidelines, there is no guarantee that all of these measures will be incorporated into the design of the Common Elements Typical Project given that they are not required and the decision to implement them would be determined by the subsequent project proponent. Accordingly, the Common Elements Typical Project would be potentially inconsistent with the goals in SB 32 and EO S-3-05.

Consistency with SB 375 and 2020 – 2045 RTP/SCS

The 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals. The 2020–2045 RTP/SCS is consistent with SB 375, which requires SCAG to adopt an SCS that outlines policies to reduce per-service-population GHG emissions from automobiles and light trucks. The SCS presents strategies and tools that are consistent with local jurisdictions' land use policies and incorporates best practices for achieving the State-mandated reductions in GHG emissions at the regional level through reduced

per-capita VMT. The strategies included in the 2020–2045 RTP/SCS to reduce GHG emissions consist of focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.

Consistent with the strategies of the RTP/SCS, the *2020 LA River Master Plan* will use existing right-of-way (ROW) to provide additional recreational and community benefits that increase neighborhood connectivity. Other improvements would include striping bicycle lanes, installing pedestrian-oriented lighting and landscaping, and creating high-visibility crosswalks and pedestrian refuges. The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across the County for cyclists, pedestrians, and equestrians. The Common Elements Typical Project includes installation of bike racks, which would help promote cyclist trips in place of vehicle trips, thereby helping reduce per service population GHG emissions from passenger vehicles. Thus, the Common Elements Typical Project would be consistent with the goals of SB 375 and the 2020–2045 RTP/SCS.

Consistency with County of Los Angeles 2020 CCAP

As discussed above, the County adopted the 2020 CCAP in 2015 to reduce community GHG emissions (Los Angeles County 2015). The County's 2020 CCAP is a roadmap that outlines the County's path to achieve its 2020 GHG reduction goal of 11 percent below 2010 GHG emissions levels. The 2020 CCAP's GHG reduction measures feature 26 local actions grouped into five strategy areas: green building and energy; land use and transportation; water conservation and wastewater; waste reduction, reuse, and recycling; and land conservation and tree planting. Because the 2020 CCAP analysis was prepared for the County's 2020 GHG reduction goal, its use in quantitatively evaluating the significance of the GHG emissions of the Common Elements Typical Project, which could be operating by 2022, is not applicable. Consequently, the 2020 CCAP is used qualitatively for this analysis to determine if the Common Elements Typical Project would be consistent with the 2020 CCAP measures.

The consistency of the Common Elements Typical Project with the measures in the County's 2020 CCAP is analyzed in Table 3.7-7. As shown in Table 3.7-7, nine of the actions are not applicable to the Common Elements Typical Project, and therefore consistency with these measures does not apply. The Common Elements Typical Project would be potentially inconsistent with one of the 17 remaining relevant actions in the County's 2020 CCAP.

Table 3.7-7. Consistency of the Common Elements Typical Project with 2020 CCAP Measures

Local Actions	Consistency
Green Building and Energy	
BE-1 (Green Building Development): Promote and incentivize at least Tier 1 voluntary standards within CALGreen for all new residential and nonresidential buildings. Develop a heat island reduction plan and facilitate green building development by removing regulatory and procedural barriers.	**Consistent.** Development under the Common Elements Typical Project would comply with all applicable local and State building measures at the time of their development, including CALGreen. The Design Guidelines for the pavilions recommend the following best practices that would reduce building energy use and heat island effects beyond the CALGreen measures: use of renewable energy sources; optimized building orientation for solar exposure, diffused daylight, and passive ventilation;

Local Actions	Consistency
	high thermal performance; high-albedo roof and paving materials to mitigate heat gain; and green roof and pervious paving. Also, other building standards from which energy efficiency best practices will be referenced include United States Green Building Council's LEED, United States Department of Energy Better Buildings Initiative, ENERGY STAR, Dark Sky, Cradle-to-Cradle, and Green Globes.
BE-3 (Solar Installations): Promote and incentivize solar installations for new and existing homes, commercial buildings, carports and parking areas, water heaters, and warehouses.	**Consistent.** The Design Guidelines for the pavilions recommend the use of renewable energy sources and solar-powered outdoor lighting.
BE-4 (Alternative Renewable Energy Programs): Implement pilot projects for currently feasible wind, geothermal, and other forms of alternative renewable energy.	**Consistent.** The Design Guidelines for the pavilions recommend the use of renewable energy sources (including wind and solar).
Land Use and Transportation	
LUT-1 (Bicycle Programs and Supporting Facilities): Construct and improve bicycle infrastructure to increase biking and bicyclist access to transit and transit stations/hubs. Increase bicycle parking and end-of-trip facilities.	**Consistent.** The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across the County for cyclists, pedestrians, and equestrians, and intends to accommodate as many user types as safely possible. It is likely that a portion of the vehicle trips associated with operations of the Common Elements Typical Project would be displaced by other modes, such as pedestrian and cyclist trips. The Common Elements Typical Project includes installation of bike racks, which would help promote cyclist trips in place of vehicle trips.
LUT-2 (Pedestrian Network): Construct and improve pedestrian infrastructure to increase walking and pedestrian access to transit and transit stations/hubs. Program the construction of pedestrian projects toward the goal of completing 15,000 linear feet of new pedestrian improvements/amenities per year.	Consistent. See LUT-1.
LUT-3 (Transit Expansion): Collaborate with the Los Angeles County Metropolitan Transportation Authority (Metro) on a transit program prioritizes transit by creating bus priority lanes, improving transit facilities, reducing transit-passenger time, and providing bicycle parking near transit stations. Construct and improve bicycle, pedestrian and transit infrastructure to increase bicyclist and pedestrian access to transit and transit stations/hubs.	Consistent. See LUT-1.

Local Actions	Consistency
LUT-4 (Travel Demand Management): Encourage ride- and bike-sharing programs and employer sponsored vanpools and shuttles. Encourage market-based bike sharing programs that support bicycle use around and between transit stations/hubs. Implement marketing strategies to publicize these programs and reduce commute trips.	**Consistent.** The *2020 LA River Master Plan* would improve bicycle and pedestrian infrastructure, supporting bicycle use around and between transit stations/hubs.
LUT-6 (Land Use Design and Density): Promote sustainability in land use design, including diversity of urban and suburban developments.	**Consistent.** The Common Elements Typical Project would result in the development of collocated recreational and commercial land uses along the project area accessible via active transportation modes.
LUT-9 (Idling Reduction Goal): Encourage idling limits of 3 minutes for heavy-duty construction equipment, as feasible within manufacturer's specifications.	**Consistent.** The *2020 LA River Master Plan* would be consistent with the County Idling Reduction Ordinance, which requires signs in on-site loading areas to encourage vehicle idle reduction.
LUT-11 (Sustainable Pavements Program): Reduce energy consumption and waste generation associated with pavement maintenance and rehabilitation.	**Consistent.** The Design Guidelines describe numerous paving typologies, including permeable paving.
LUT-12 (Electrify Construction and Landscaping Equipment): Utilize electric equipment wherever feasible for construction projects. Reduce the use of gas-powered landscaping equipment.	**Potentially Inconsistent.** The *2020 LA River Master Plan* does not include any best practices related to electric construction and landscaping equipment.
Water Conservation and Wastewater	
WAW-1 (Per Capita Water Use Reduction Goal): Meet the State established per capita water use reduction goal, as identified by SB X7-7 (The Water Conservation Act of 2009) for 2020.	**Consistent.** The Design Guidelines for the pavilions recommend the following best practices that would reduce water: on-site water retention, detention, and filtration; capture of 100 percent of on-site rainfall for the 85 percent rain event; greywater and rainwater reuse; bioswales or treatment basins to collect stormwater runoff; and low-flow water fixtures.
WAW-2 (Recycled Water Use, Water Supply Improvement Programs, and Storm Water Runoff): Promote the use of wastewater and gray water to be used for agricultural, industrial, and irrigation purposes. Manage stormwater, reduce potential treatment, and protect local groundwater supplies.	Consistent. See WAW-1.
Waste Reduction, Reuse, and Recycling	
SW-1 (Waste Diversion Goal): For the County's unincorporated areas, adopt a waste diversion goal to comply with all state mandates associated with diverting from landfill disposal at least 75 percent of the waste by 2020.	**Consistent.** The Design Guidelines for the pavilions recommend the following best practices that would divert waste: use locally sourced, recycled, and recyclable materials with low-embodied energy; recycle construction waste; use green cleaning and integrated building management; and regularly monitor building systems and optimize usage.

Local Actions	Consistency
Land Conservation and Tree Planting	
LC-1 (Develop Urban Forests): Support and expand urban forest programs within the unincorporated areas.	**Consistent.** The Common Elements Typical Project would include planting of vegetation. Furthermore, the Design Guidelines for ecology and planting describe the best practices that would support urban forests: provide a continuous native tree and plant corridor along the river with linkages to riparian habitat and upland areas near the river; and support nurseries and organizations that specifically collect and propagate indigenous native plant species for planting along the river corridor.
LC-2 (Create New Vegetated Open Space): Restore and re-vegetate previously disturbed land and/or unused urban and suburban areas.	Consistent. See LC-1.
LC-4 (Protect Conservation Areas): Encourage the protection of existing land conservation areas.	Consistent. See LC-1.

Consistency with Los Angeles County CAP

As discussed above, the County released the draft Los Angeles County CAP in March 2020. As of August 2020, the anticipated adoption date of the plan is unknown. The draft Los Angeles County CAP outlines actions that the County plans to take to reduce GHG emissions and achieve carbon neutrality by 2045 in unincorporated County areas. The Los Angeles County CAP includes 17 strategies that support this goal. The strategies alone would result in an 86 percent reduction from 1990 baseline emissions, leaving about 1.3 million residual $MTCO_2e$ in 2045. If the residual emissions cannot be eliminated through new technologies introduced over the next 25 years, the County will consider the purchase of certified carbon credits (or offsets) to achieve carbon neutrality by 2045. The strategies and actions in the plan will be reassessed when the CAP is next updated in 2025.

The Los Angeles County CAP strategies span the sectors of transportation; stationary energy (i.e., buildings); waste; industrial processes and product use; and agriculture, forestry, and other land uses. The strategies are supported by 71 actions. Many of the actions build off those identified in the 2020 CCAP and therefore the Common Elements Typical Project would be consistent with these actions. Some strategies (e.g., accelerate freight decarbonization) deal with emissions sectors that are not relevant to the Common Elements Typical Project. However, the Common Elements Typical Project would be potentially inconsistent with Action T29 (similar to 2020 CCAP action LUT-12), which requires, whenever feasible, the use of zero-emission and near-zero-emission construction, agriculture, and manufacturing equipment for County projects (Los Angeles County 2020). Therefore, the Common Elements Typical Project would be potentially inconsistent with the Los Angeles County CAP.

Consistency with OurCounty Sustainability Plan

As discussed above, in July 2019, the County adopted the OurCounty Sustainability Plan. The plan includes 12 primary goals that have a total of 37 strategies, with a total of 159 actions. The plan is used qualitatively for this analysis to determine if the Common Elements Typical Project would be generally consistent with the applicable GHG emissions goals, strategies, and actions.

The OurCounty Sustainability Plan includes numerous strategies related to urban forestry, sustainable building design, building energy consumption, renewable energy, active and alternative transportation, waste generation, integrated water systems, and water conservation.

Plantings at the project site ensure that the Common Elements Typical Project would be consistent with the OurCounty Sustainability Plan's strategies related to urban forestry.

The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across Los Angeles County for cyclists, pedestrians, and equestrians, and intends to accommodate as many user types as safely possible. It is likely that a portion of the vehicle trips associated with operations of the Common Elements Typical Project would be displaced by other modes, such as pedestrian and cyclist trips. The Common Elements Typical Project includes installation of bike racks at all project sites or at set intervals along the LA River Trail. This biking infrastructure would help promote cyclist trips in place of vehicle trips. These features address the OurCounty Sustainability Plan strategies related to active and alternative transportation.

The Design Guidelines described above under the Common Elements Typical Project related to water, energy, and waste would minimize GHG emissions associated with future development through water and energy conservation, solid waste diversion, and use of renewable energy—all of which are discussed in the strategies of the OurCounty Sustainability Plan. However, while the County would encourage implementation of the Design Guidelines, there is no guarantee that all of these measures will be incorporated into the design of the Common Elements Typical Project given that they are not required and the decision to implement them would be determined by the subsequent project proponent. Accordingly, the Common Elements Typical Project would be potentially inconsistent with strategies identified in the OurCounty Sustainability Plan.

Consistency with other State Regulations

As discussed above, systemic changes will be required at the State level to achieve California's future GHG reduction goals. Regulations, such as future amendments to the LCFS, future updates to the State's Title 24 standards, and implementation of the State's SLCP Reduction Strategy, including forthcoming regulations for composting and organics diversion, will be necessary to attain the magnitude of reductions required for the State's goals.

The Common Elements Typical Project would be required to comply with these regulations in new construction (in the case of updated Title 24 standards), or would be directly affected by the outcomes (vehicle trips and energy consumption would be less carbon intensive due to statewide compliance with future LCFS amendments and increasingly stringent RPS). Therefore, for the foreseeable future, the Common Elements Typical Project would not conflict with any other long-term state-level regulations pertaining to GHGs.

Summary

Operation of the Common Elements Typical Project would be consistent with the 2017 Scoping Plan, SB 375, the 2020–2045 RTP/SCS, and other State regulations (e.g., LCFS, Title 24 standards, SLCP Reduction Strategy). However, the Common Elements Typical Project would be potentially inconsistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, 2020 CCAP, updated Los Angeles County CAP, and OurCounty Sustainability Plan due to the reasons described above. Therefore, construction and operation of the Common Elements Typical Project would potentially

conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Frame 1

As described above, based on the consistency analysis of the GHG plans relevant to each of the nine planning frames, the Common Elements Typical Project could conflict with GHG plans relevant to all frames. The potential for inconsistency with additional GHG plans relevant only to Frame 1 appears below. The only additional GHG plan for Frame 1 is the City of Long Beach CAAP.

Consistency with City of Long Beach CAAP

As discussed above, in May 2019 the City of Long Beach released a working draft of its CAAP. This plan includes mitigation and adaptation strategies for the city to address climate impacts and to reduce the city's impacts on climate change through reducing GHG emissions. Priority mitigation actions in the transportation, energy, and waste sectors are presented and include actions such as providing expanding and improving pedestrian infrastructure, providing access to renewable generated electricity, and ensuring compliance with waste collection programs.

While the CAAP has not yet been finalized or adopted by the City of Long Beach, mitigation strategies can still be used for a consistency analysis with the Common Elements Typical Project. As shown in Table 3.7-8, the Common Elements Typical Project would be consistent with the eight applicable actions in the City of Long Beach's CAAP.

Table 3.7-8. Consistency of the Common Elements Typical Project with CAAP Priority Mitigation Actions

Priority Mitigation Actions	Consistency
Transportation	
T-2. Increase employment and residential development along primary transit corridors.	**Consistent.** The Common Elements Typical Project would be located along the river channel within the existing ROW and would not compete with potential development along primary transit corridors.
T-4. Increase bikeway infrastructure.	**Consistent.** The Common Elements Typical Project includes installation of bike racks, which would help promote cyclist trips.
T-5. Expand/improve pedestrian infrastructure citywide.	**Consistent.** The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across the County for cyclists, pedestrians, and equestrians.
T-8. Increase density and mixing of land uses.	**Consistent.** The Common Elements Typical Project would result in the development of collocated recreational and commercial land uses along the project area accessible via active transportation modes.
Energy	
BE-4. Promote community solar and microgrids.	**Consistent.** The Design Guidelines for the pavilions recommend the use of renewable energy sources (including wind and solar).

Priority Mitigation Actions	Consistency
Waste	
W-1. Ensure compliance with state law recycling program requirements for multi-family residential and commercial property.	**Consistent.** The Common Elements Typical Project includes dual trash/recycling bins.
W-4. Identify organic waste management options.	Consistent. See W-3.

Frame 2

Consistency with the City of Long Beach CAAP would also be required for development under the Common Elements Typical Project that occur in the portion of the city that overlaps with Frame 2. The City of Long Beach CAAP consistency analysis is presented above for Frame 1 in Table 3.7-8.

As described above, based on the consistency analysis of the GHG plans relevant to each of the nine planning frames, the Common Elements Typical Project would potentially conflict with GHG plans relevant to all frames. The potential for inconsistency with additional GHG plans relevant only to Frame 2 appears below. The only additional GHG plan for Frame 2 is the City of Carson CAP.

Consistency with City of Carson CAP

As discussed above, the City of Carson's CAP, adopted in 2017, sets a long-term goal of reducing GHG emissions by 49 and 80 percent below 2005 levels by 2035 and 2050, respectively. The CAP identifies goals, measures, and sub-strategies to reduce GHG emissions related to land use and transportation, energy efficiency, solid waste, urban greening, and energy generation and storage.

The Design Guidelines for the pavilions recommends best practices to reduce GHG emissions associated with energy, water, and waste. The Common Elements Typical Project would utilize existing ROW to provide additional recreational and community benefits that increase neighborhood connectivity and create a mobility network across the County for cyclists, pedestrians, and equestrians. The Common Elements Typical Project includes installation of bike racks, which would help promote cyclist trips in place of vehicle trips. The Common Elements Typical Project would also include planting of vegetation that would sequester carbon. Therefore, the Common Elements Typical Project would be consistent with the applicable goals of the City of Carson's CAP.

Frame 7

As described above, based on the consistency analysis of the GHG plans relevant to each of the nine planning frames, the Common Elements Typical Project would potentially conflict with GHG plans relevant to all frames. The potential for inconsistency with additional GHG plans relevant only to Frame 7 appears below. The only additional GHG plan for Frame 7 is the City of Burbank GGRP.

Consistency with City of Burbank CAP

As discussed above, the City of Burbank's GGRP identifies emission-reduction opportunities with the community, in addition to the incorporation of best practices from other jurisdictions and organizations and State and regional laws, guidance, and recommendations.

The consistency of the Common Elements Typical Project with the measures in the City of Burbank's GGRP is analyzed in Table 3.7-9. As shown in Table 3.7-9, the Common Elements Typical Project would be consistent with the relevant measures in the City of Burbank's GGRP.

Table 3.7-9. Consistency of the Common Elements Typical Project with City of Burbank GGRP Measures

Measures	Consistency
Building and Energy	
E-1.1. Energy Efficiency in New Construction. The City will require new commercial projects to be constructed to Title 24 Tier 1 levels (e.g., exceed current efficiency standards by 15%) beginning in January 2015.	**Consistent.** Development under the Common Elements Typical Project would comply with all applicable local and State building measures at the time of their development, including the Title 24 Standards. Furthermore, development under the Common Elements Typical Project would comply with all applicable local and regional programs and ordinances.
E-1.3. Energy Star Appliances. The City will encourage voluntary community participation to install Energy Star appliances or other energy-efficient appliance models in both new and existing residential units.	**Consistent.** The Design Guidelines for the pavilions include best practices to use energy efficient appliances.
E-1.4. Smart Grid Integration. The City will encourage voluntary adoption of smart grid technology in new and existing construction, promoting the use of smart appliances in homes and businesses and the use of OPower to track building energy use.	**Consistent**. Development under the Common Elements Typical Project would comply with all applicable local and State building measures at the time of their development, including the Title 24 Standards.
E-1.5. Cool Roofs. The City will extend its current Cool Roof Pilot Program and will advertise BWP's non-residential cool roof incentives to building owners when they obtain permits for re-roofing.	**Consistent.** The Design Guidelines for the pavilions include best practices to use energy efficient appliances.
E-1.6. BWP Energy Conservation Programs. WP will continue to implement a variety of energy conservation programs in order to achieve its goal of 1% annual reductions in projected energy loads.	**Consistent.** The Design Guidelines for the pavilions include best practices to use high-albedo roofs and paving materials to mitigate heat gain, as well as green roofs and pervious paving.
E-1.7. Building Shade Trees. BWP will continue to administer the Made in the Shade Program. The City will also revise the Zoning Ordinance to require the planting of two building shade trees per parcel to accompany each new single-family residential unit. The City will update its Street Tree Plan and Urban Forestry program, with a focus on identifying streets that currently lack street trees, parking lots that could accommodate additional shade trees, and locations for new tree plantings in City parks and open space	**Consistent.** The Design Guidelines for ecology and planting include best practices to provide a continuous native tree and plant corridor along the river with linkages to riparian habitat and upland areas near the river.
E-2.2 Solar Photovoltaic Systems. The City will actively promote development of building-scale solar energy. The City will develop an outreach campaign to ensure BWP's Solar Photovoltaic Power program is fully subscribed between 2013 and 2016 to meet its solar goal. The City will also reduce or remove its third-party electrical review for non-	**Consistent.** The Design Guidelines for the pavilions recommend the use of renewable energy sources, including solar.

Measures	Consistency
residential solar PV permits through January 1, 2017 to further encourage full participation in the program.	
E-1.7. Light-emitting Diode Street Lights. Upon completion of the pilot testing, the City will install energy-efficient street lights throughout Burbank. The City will also update its Street Light Master Plan to include lighting efficiency requirements.	**Consistent.** The Design Guidelines for the pavilions recommend the use of solar-powered outdoor lighting.
Transportation	
T-1.1. Pedestrian Enhancements. The City will complete the City of Burbank Pedestrian Master Plan, which includes policies, programs, and design guidelines that will enable the City to foster a safer, more attractive, and usable pedestrian environment for residents and visitors. The Master Plan should identify priority improvements and available funding to support implementation. The City will also continue to include pedestrian enhancements as part of its infrastructure projects.	**Consistent.** The *2020 LA River Master Plan* aims to connect to other trails and paths along the length of the river to create a mobility network across the County for cyclists, pedestrians, and equestrians.
T-1.4. Bicycle Infrastructure Expansion. The City will continue to expand bicycle infrastructure within public rights-of-way, including on-street bicycle lanes and routes, bicycle parking, and directional signage	**Consistent.** See T-1.1. The Common Elements Typical Project would include installation of bike racks at all project sites or at set intervals along the LA River Trail.
T-1.5. Bicycle Accommodation Ordinance. The City will adopt its draft bicycle accommodation ordinance by June 2013. The City will also provide technical assistance to developers during the building permit phase, including best practice examples, to ensure successful implementation.	**Consistent.** See T-1.1 and T-1.5.
T-2.1. Transportation Management Organization Expansion. The City will work with the Transit Management Organization (TMO) to expand the geographic reach of its programs and the extent of services it currently provides. The City will require that all new businesses with 25 or more employees located within the TMO boundary become TMO members and fulfill reporting requirements.	**Consistent.** Development under the Common Elements Typical Project would comply with all applicable City of Burbank programs and ordinances.
Water Conservation	
W-1.1. Water Conservation Programs. The City will implement water conservation programs described in the Urban Water Management Plan (UWMP) in support of BWP's goal to reduce water consumption by 1% annually.	**Consistent.** The Design Guidelines for the pavilions recommend the following best practices that would reduce water: on-site water retention, detention, and filtration; capture of 100 percent of on-site rainfall for the 85 percent rain event; greywater and rainwater reuse; bioswales or treatment basins to collect stormwater runoff; and low-flow water fixtures.

Measures	Consistency
W-1.2. Recycled Water Use Master Plan. The City will implement water conservation programs described in the Urban Water Management Plan (UWMP) in support of BWP's goal to reduce water consumption by 1% annually.	Consistent. See W-1.1.
W-1.3. Stormwater Management Plan. The City will prepare a Stormwater Management Plan that seeks to apply best management practices, including LID features, into future system upgrades or extensions.	Consistent. See W-1.3.
Waste Reduction	
SW-1.1. Food Scrap and Compostable Paper Diversion Ordinance. The City will adopt a food scraps and compostable paper diversion ordinance, requiring all food waste and compostable paper to be diverted from the waste stream to composting facilities.	**Consistent.** If development under the Common Elements Typical Project is deemed a covered business under AB 341 and AB 1826 and/or a regulated entity under SB 1383, it would comply with the state laws on organic waste diversion.
SW-1.2. Yard Waste Diversion Ordinance. The City will adopt an ordinance banning disposal of yard waste in trash bins. Multi-family residential and non-residential properties that are not currently served by the City's solid waste collection program would need to contract with a yard waste collection service provider.	Consistent. See SW-1.1.
SW-1.4. Reusable Bags. Promote the environmental benefits of reusable shopping bags on the City website.	**Non-applicable.** The City of Burbank is responsible for implementing this measure.
SW-1.5. Recycling Ordinance. The City will adopt an ordinance requiring the provision of recycling bins and/or recycling areas in all residential and non-residential buildings. Multi-family residential and non-residential properties that are not currently served by the City's solid waste collection program would need to contract with a recycling collection service provider. The City will perform random spot-checks of multi-family residential and commercial buildings to ensure provision of recycling bins.	**Consistent.** The Common Elements Typical Project would include dual trash/recycling bins.

Summary

For all planning frames, the Common Elements Typical Project would be consistent with the 2017 Scoping Plan, SB 375, the 2020–2045 RTP/SCS, and other State regulations (e.g., LCFS, Title 24 standards, SLCP Reduction Strategy). For future development of the Common Elements Typical Project within the City of Long Beach in either Frame 1 or 2, the Common Elements Typical Project would be consistent with the City of Long Beach CAAP. For future development in the City of Carson in Frame 2, the Common Elements Typical Project would be consistent with the City of Carson CAP. For future development in the City of Burbank in Frame 7, the Common Elements Typical Project would be consistent with the City of Burbank GGRP.

However, for all planning frames, the Common Elements Typical Project would be potentially inconsistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, 2020 CCAP, Los Angeles County CAP, and the OurCounty Sustainability Plan. Implementation of the Design Guidelines related to waste, water, and energy would make the Common Elements Typical Project consistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, and the OurCounty Sustainability Plan. However, while the County would encourage implementation of the Design Guidelines, there is no guarantee that all of these measures will be incorporated into the design of the Common Elements Typical Project by project proponents in subsequent projects, given that they are not required. Furthermore, the 2020 CCAP measure LUT-12 and Los Angeles County CAP measure T29 related to electrified landscaping and construction equipment are not addressed by the Design Guidelines best practices for the Project. Therefore, construction and operation of the Common Elements Typical Project would potentially conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and would therefore result in a potentially significant impact.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measure, which is described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

In addition, apply the following mitigation measure.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

Implementing agencies will require applicants of future development to implement the following GHG emissions-reduction strategies where feasible.

- Zero-emission and near-zero-emission construction equipment will be used, to the extent feasible.

Significance after Required Mitigation

With mitigation, the Common Elements Typical Project would no longer be inconsistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, 2020 CCAP, Los Angeles County CAP, and OurCounty Sustainability Plan. With implementation of Mitigation Measure GHG-1a, the Common Elements Typical Project would be consistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, and Los Angeles County 2020 CCAP action LUT-12 related to electrified landscaping equipment. With implementation of Mitigation Measure GHG-2, the Common Elements Typical Project would be consistent with the Los Angeles County 2020 CCAP action LUT-12 and Los Angeles County CAP action T29 (electrified construction equipment). Therefore, the Common Elements Typical Project would not conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Impacts for construction and operation would be less than significant for later activities when carried out by the County.

Impacts would be significant and unavoidable for projects for later activities when not carried out by the County.

Multi-Use Trails and Access Gateways

As discussed above, before implementation of mitigation, the Common Elements Typical Project would result in a potentially significant impact due to inconsistencies with State regulatory programs related to the following emission sources: construction, energy, water, and waste. The Multi-Use Trails and Access Gateways Typical Project also includes these emission sources, excluding energy (see Table 3.7-5). Given the similarity between the Multi-Use Trails and Access Gateways Typical Project and the Common Elements Typical Project in terms of the types of emission sources associated with operation (e.g., construction, water, waste), GHG impacts from the Multi-Use Trails and Access Gateways Typical Project would be similar to those of the Common Elements Typical Project described above.

For all planning frames, the Multi-Use Trails and Access Gateways Typical Project would be consistent with the 2017 Scoping Plan, SB 375, 2020–2045 RTP/SCS, and other State regulations (e.g., LCFS, Title 24 standards, SLCP Reduction Strategy). For future development of the Multi-Use Trails and Access Gateways Typical Project within the City of Long Beach in either Frame 1 or 2, the Project would be consistent with the City of Long Beach CAAP. For future development in the City of Carson in Frame 2, the Multi-Use Trails and Access Gateways Typical Project would be consistent with the City of Carson CAP. For future development in the City of Burbank in Frame 7, the Project would be consistent with the City of Burbank GGRP. The Multi-Use Trails and Access Gateways Typical Project would not include any buildings or infrastructure that would consume electricity or natural gas. Therefore, the GHG plans' measures related to building energy described for the Common Elements Typical Project would not apply to the Multi-Use Trails and Access Gateways Typical Project.

However, for all planning frames, the Multi-Use Trails and Access Gateways Typical Project would be potentially inconsistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, 2020 CCAP, Los Angeles County CAP, and OurCounty Sustainability Plan. Implementation of the Design Guidelines related to waste and water would make the Multi-Use Trails and Access Gateways Typical Project consistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, and OurCounty Sustainability Plan. However, while the County would encourage implementation of the Design Guidelines, there is no guarantee that all of these measures will be incorporated into the design of the Multi-Use Trails and Access Gateways Typical Project given that they are not required and the decision to implement them would be determined by the subsequent project proponent. Furthermore, the 2020 CCAP measure LUT-12 and Los Angeles County CAP measure T29 related to electrified landscaping and construction equipment are not addressed by the Design Guidelines best practices for the Project. The construction and operation of Multi-Use Trails and Access Gateways Typical Project would potentially conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs; this impact would therefore be potentially significant.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure GHG-1b: Implement Operations GHG Emissions Reduction Strategies Specific to Emission Sources of Multi-Use Trails and Access Gateways.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

Significance after Required Mitigation

With mitigation, the Multi-Use Trails and Access Gateways Project would no longer be inconsistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, 2020 CCAP, Los Angeles County CAP, and OurCounty Sustainability Plan. With implementation of Mitigation Measure GHG-1a, the Multi-Use Trails and Access Gateways Typical Project would be consistent with the 2008 Scoping Plan and First Update, SB 32, EO S-3-05, and 2020 CCAP action LUT-12 related to electrified landscaping equipment. With implementation of Mitigation Measure GHG-2, the Multi-Use Trails and Access Gateways Typical Project would be consistent with the 2020 CCAP action LUT-12 and Los Angeles County CAP action T29 (electrified construction equipment). Therefore, the Multi-Use Trails and Access Gateways Typical Project would not conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Impacts for construction and operation would be less than significant for later activities when carried out by the County.

Impacts would be significant and unavoidable for projects for later activities when carried out by the County.

2020 LA River Master Plan Kit of Parts

The Common Elements Typical Project analyzed above could be implemented in whole or as a combination of its individual elements with any of the KOP categories discussed below. Therefore, for potential impacts of the Common Elements Typical Project, see above. The impact discussion below focuses on specific KOP categories only.

KOP Category 1

Certain design components of KOP Category 1 inform the Multi-Use Trails and Access Gateways Typical Project analyzed above in more detail. Therefore, for potential construction and operation impacts of these design components, see above. The design components analyzed in this section include those listed in Section 2.5.1 under the *KOP Category 1: Trails and Access Gateways* heading.

Impacts from the Multi-Use Trails and Access Gateways Typical Project would be similar to those of the Common Elements Typical Project described above for Impact 3.7(b). It should be noted that many of the design components of KOP Category 1 (e.g., lookouts, boardwalks, vegetated buffer) are passive (i.e., no emissions are associated with them) and therefore would likely not result in a relatively high amount of GHG emissions during operations. However, the lack of specific sites or detailed design information makes it particularly challenging to make informed assumptions about reasonable construction and operations scenarios for KOP Category 1. It is assumed that development under KOP Category 1 would be greater than the Typical Projects, and that associated GHG emissions could potentially result in an inconsistency with one or more of the GHG plans

analyzed in detail for the Common Elements Typical Project. Impacts related to the potential for construction and operation of KOP Category 1 to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be potentially significant.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

Because not all emissions sources identified for the Common Elements Typical Project would occur as part of the operations activities associated with KOP Category 1, the GHG reduction strategies of Mitigation Measure GHG-1a should be assessed for their applicability to future development.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1, GHG-2, and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project details (e.g., expected VMT, proximity to transit centers), it cannot be stated with certainty that KOP Category 1 would be consistent with the applicable GHG regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 2

Impacts from KOP Category 2 would be similar to those of the Common Elements Typical Project described above for Impact 3.7(b). It should be noted that all of the design components of KOP Category 2 are passive (i.e., no emissions are directly associated with operation) and therefore this KOP category would result in only a minor amount of direct GHG emissions during operations. However, recreation uses (such as amphitheaters and parks) of KOP Category 2 design components could result in emissions from energy sources (e.g., outdoor lighting), water use requiring energy (e.g., conveyance and distribution), wastewater generation, or waste generation. Therefore, the GHG plans' measures related to outdoor lighting, water, mobile, and waste described for the Common Elements Typical Project could apply to KOP Category 2. The lack of specific sites or detailed design

information makes it particularly challenging to make informed assumptions about reasonable construction and operations scenarios for KOP Category 2. It is assumed that development under KOP Category 2 would be greater than the Typical Projects, and that associated GHG emissions could potentially result in an inconsistency with one or more of the GHG plans analyzed for the Common Elements Typical Project. Impacts related to the potential for KOP Category 2 to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be potentially significant.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

Because not all emissions sources identified for the Common Elements Typical Project would occur as part of the operations activities associated with KOP Category 2, the GHG reduction strategies of Mitigation Measure GHG-1a should be assessed for their applicability to future development.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1, GHG-2, and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project details (e.g., expected VMT, proximity to transit centers), it cannot be stated with certainty that KOP Category 2 would be consistent with the applicable GHG regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 3

Impacts from KOP Category 3 would be similar to those of the Common Elements Typical Project described above for Impact 3.7(b). It should be noted that all of the design components of KOP Category 3 are passive (i.e., no emissions are directly associated with operation) and therefore this KOP category would result in only a minor amount of direct GHG emissions during operations. It is anticipated that project operations would not include building energy or stationary sources (e.g., generators). However, recreational uses, such as parks and recreational fields, of KOP Category 3

design components could include outdoor lighting, water use requiring energy (e.g., conveyance, distribution, treatment), wastewater generation, or waste generation. Therefore, the GHG plans' measures related to outdoor lighting, mobile, water, and waste described for the Common Elements Typical Project could apply to KOP Category 3. The lack of specific sites or detailed design information makes it particularly challenging to make informed assumptions about reasonable construction and operations scenarios for KOP Category 3. It is assumed that development under KOP Category 3 would be greater than the Typical Projects, and that associated GHG emissions could potentially result in an inconsistency with one or more of the GHG plans analyzed for the Common Elements Typical Project. Impacts related to the potential for construction and operation of KOP Category 3 to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be potentially significant.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

Because not all emissions sources identified for the Common Elements Typical Project would occur as part of the operations activities associated with KOP Category 3, the GHG reduction strategies of Mitigation Measure GHG-1a should be assessed for their applicability to future development.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1, GHG-2, and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project details (e.g., expected VMT, proximity to transit centers), it cannot be stated with certainty that KOP Category 3 would be consistent with the applicable GHG regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 4

Impacts from KOP Category 4 would be similar to those of the Common Elements Typical Project described above for Impact 3.7(b). Operation of this KOP category would require an unknown

amount of electricity during use of water pumps for diversion activities. It should be noted project operations would not include building energy or stationary sources (e.g., generators). However, design components could include water use requiring energy and waste generation. Therefore, the GHG plans' measures related to water mobile, and waste described for the Common Elements Typical Project could apply to KOP Category 4. The lack of specific sites or detailed design information makes it particularly challenging to make informed assumptions about reasonable construction and operations scenarios for KOP Category 4. It is assumed that development under KOP Category 4 would be greater than the Typical Projects, and that associated GHG emissions could potentially result in an inconsistency with one or more of the GHG plans analyzed for the Common Elements Typical Project. Impacts related to the potential for construction and operation of KOP Category 4 to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be potentially significant.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

Because not all emissions sources identified for the Common Elements Typical Project would occur as part of the operations activities associated with KOP Category 4, the GHG reduction strategies of Mitigation Measure GHG-1a should be assessed for their applicability to future development.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1,GHG-2, and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project details (e.g., expected VMT, proximity to transit centers), it cannot be stated with certainty that KOP Category 4 would be consistent with the applicable GHG regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 5: Floodplain Reclamation

Impacts from KOP Category 5 would be similar to those of the Common Elements Typical Project described above for Impact 3.7(b). It should be noted that project operations would not include building energy or stationary sources (e.g., generators). However, recreational uses, such as farmers markets and recreational fields, of KOP Category 5 design components would require outdoor lighting and result in water consumption and waste generation. Therefore, the GHG plans' measures related to outdoor lighting, mobile, water, and waste described for the Common Elements Typical Project could apply to KOP Category 5. However, the lack of specific sites or detailed design information makes it particularly challenging to make informed assumptions about reasonable construction and operations scenarios for KOP Category 5. It is assumed that development under KOP Category 5 would be greater than the Typical Projects, and that associated GHG emissions could potentially result in an inconsistency with one or more of the GHG plans analyzed for the Common Elements Typical Project. Impacts related to the potential for construction and operation of KOP Category 5 to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be potentially significant.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

Because not all emissions sources identified for the Common Elements Typical Project would occur as part of the operations activities associated with KOP Category 5, the GHG reduction strategies of Mitigation Measure GHG-1a should be assessed for their applicability to future development.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1, GHG-2, and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project details (e.g., expected VMT, proximity to transit centers), it cannot be stated with certainty that KOP Category 5 would be

consistent with the applicable GHG regulatory programs. With mitigation, impacts would be significant and unavoidable.

KOP Category 6

Impacts from KOP Category 6 would be similar to those of the Common Elements Typical Project described above for Impact 3.7(b). It should be noted that project operations would result in GHG emissions from numerous sources, including building energy, vehicle trips, area sources from landscaping equipment, stationary sources, water, and waste from all design components. The lack of specific sites or detailed design information makes it particularly challenging to make informed assumptions about reasonable construction and operations scenarios for KOP Category 6. It is assumed that development under KOP Category 6 would be greater than the Typical Projects, and that associated GHG emissions could potentially result in an inconsistency with one or more of the GHG plans analyzed for the Common Elements Typical Project. Impacts related to the potential for construction and operation of KOP Category 6 to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be potentially significant.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

Because not all emissions sources identified for the Common Elements Typical Project would occur as part of the operations activities associated with KOP Category 6, the GHG reduction strategies of Mitigation Measure GHG-1a should be assessed for their applicability to future development.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1, GHG-2, and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project details (e.g., expected VMT, proximity to transit centers), it cannot be stated with certainty that KOP Category 6 would be

consistent with the applicable GHG regulatory programs. With mitigation, impacts would be significant and unavoidable.

Overall 2020 LA River Master Plan Implementation

As described in the *2020 LA River Master Plan*, it is anticipated that approximately 107 projects ranging in size from extra-small (less than 1 acre) to extra-large (150+ acres/10+ miles) would be implemented under the *2020 LA River Master Plan* over the 25-year horizon period to meet the *2020 LA River Master Plan*'s nine objectives. These would include the Typical Projects that would be implemented along the river, and subsequent projects composed of the KOPs' multi-benefit design components. These elements together compose the entirety of the *2020 LA River Master Plan*.

Construction would involve GHG emissions from the use of heavy-duty construction equipment, construction worker vehicle trips, material deliveries, and trips by heavy-duty haul trucks. Operation would involve GHG emissions from building natural gas use, stationary sources, worker and visitor vehicle trips, and other sources. Because details about the *2020 LA River Master Plan* construction and operation scenarios are unknown, GHG emissions associated with the entirety of the *2020 LA River Master Plan* have not been quantified. Because development of the *2020 LA River Master Plan* represents all of the Typical Projects and KOP categories combined, the associated construction and operation GHG emissions could potentially result in an inconsistency with one or more of the GHG plans analyzed for the Typical Projects. Impacts related to the potential for construction and operation of the *2020 LA River Master Plan* to conflict with or obstruct implementation of an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be potentially significant.

Impact Determination

Impacts for construction and operation would be potentially significant.

Mitigation Measures

Apply the following mitigation measures, which are described above.

Mitigation Measure GHG-1a: Implement Sector-Specific Operations GHG Emissions Reduction Strategies.

Mitigation Measure GHG-2: Implement Construction GHG Emissions Reduction Strategies.

In addition, apply the following mitigation measure, which is described in Section 3.16, *Transportation*.

Mitigation Measure TRA-1b. Implement TDM Strategies and/or Enhancements to Reduce VMT.

This mitigation measure would require implementation of a project-specific program utilizing TDM strategies and neighborhood or site enhancements to reduce VMT. By reducing VMT this mitigation measure would also reduce GHG emissions from the mobile sector.

Significance after Required Mitigation

Impacts for construction and operation would be significant and unavoidable.

Although Mitigation Measures GHG-1, GHG-2, and TRA-1b would be implemented to ensure that impacts are minimized to the extent feasible, in the absence of specific project details (e.g., expected VMT, proximity to transit centers), it cannot be stated with certainty that the *2020 LA River Master Plan* would be consistent with the applicable GHG regulatory programs. With mitigation, impacts would be significant and unavoidable.

Cumulative Impacts

The analysis of greenhouse gas emissions is cumulative by its nature, and the geographic context is global. The preceding analysis addresses all cumulative impacts of the proposed Project, and a separate cumulative discussion is not required.