

4.G GREENHOUSE GAS EMISSIONS

4.G.1 INTRODUCTION

This section evaluates greenhouse gas (GHG) emissions associated with the proposed TOD Plan for Downtown Inglewood and Fairview Heights and its contribution to global climate change, including technical analyses prepared by Entech Consulting Group, for which modeling results are provided in Appendix C.

This section of the EIR evaluates the extent to which GHG emissions from future site-specific development pursuant to the proposed TOD Plan contribute to elevated levels of GHGs in Earth's atmosphere and consequently contribute to climate change and associated adverse impacts on the environment such as higher temperatures, raised sea levels, and damage to flora and fauna. This section also addresses the TOD Plan's consistency with applicable plans, policies, and public agency regulations adopted for the purpose of reducing the emissions of greenhouse gases.

DEFINITIONS

- **Carbon Dioxide Equivalent** is a metric measure used to compare the emissions from various greenhouse gases based upon their global warming potential (GWP). Carbon dioxide equivalents are commonly expressed as "million metric tons of carbon dioxide equivalents (MTCO₂E)." The carbon dioxide equivalent for a gas is derived by multiplying the tons of the gas by the associated GWP.

$$\text{MTCO}_2\text{E} = (\text{million metric tons of a gas}) * (\text{GWP of the gas})$$

- **Carbon Footprint** refers to the total amount of greenhouse gases that are emitted into the atmosphere each year by a person, family, building, organization, or company. A person's carbon footprint includes greenhouse gas emissions from fuel that an individual burns directly, such as by heating a home or riding in a car. It also includes greenhouse gases that come from producing the goods or services that the individual uses, including emissions from power plants that make electricity, factories that make products, and landfills where trash gets sent.
- **Carbon Sequestration** is the process by which trees and plants absorb carbon dioxide, release the oxygen, and store the carbon.
- **Climate change** refers to any significant change in the measures of climate lasting for an extended period of time. In other words, climate change includes major changes in temperature, precipitation, or wind patterns, among others, that occur over several decades or longer.
- **Emissions Inventory** is an estimate of the amount of pollutants emitted into the atmosphere from major mobile, stationary, area-wide, and natural source categories over a specific period of time, such as a day or a year.
- **Global Climate Change** is the observed increase in the average temperature of the Earth's atmosphere and oceans, along with other significant changes in climate (such as precipitation or wind) that last for an extended period of time. The term *global climate change* is often used interchangeably with the term *global warming*, but *global climate change* is preferred to *global*

warming because it helps convey that GHG emissions may result in other changes, in addition to rising temperatures.

- **Global Warming Potential (GWP)** is the relative warming of a GHG over a specified period of time as compared to carbon dioxide (GWP of 1). GWP allows for the conversion of different GHG emissions into the same emissions unit, carbon dioxide equivalents (CO₂e).
- **Greenhouse Gas (GHG)** refers to gases that absorb and emit radiation within the thermal infrared range, which is the fundamental cause of man's contribution to the greenhouse effect. The most prevalent GHG is carbon dioxide (CO₂), along with Methane (CH₄), Nitrous oxide (N₂O), Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), and Sulfur hexafluoride (SF₆).
- **Greenhouse Effect** is the warming effect of the Earth's atmosphere. Light energy from the sun that passes through the Earth's atmosphere is absorbed by the Earth's surface and is radiated into the atmosphere as heat energy. The heat energy is then trapped by the atmosphere, creating a situation similar to that which occurs in a car with its windows rolled up. It is now widely-accepted that the emission of carbon dioxide (CO₂) and other gases into the atmosphere increases the greenhouse effect and contributes to global warming.
- **Intergovernmental Panel on Climate Change (IPCC)** is a scientific intergovernmental body set up by the World Meteorological Organization and the United Nations Environment Programme to provide decision makers and others interested in climate change with an objective source of information about climate change (California Air Resources Board n.d.).
- **Troposphere.** The troposphere is the zone of the atmosphere characterized by water vapor, weather, winds, and decreasing temperature with increasing altitude.

4.G.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of the proposed TOD Plan is subject to a range of federal, state, regional, and local plans, policies, and regulations, which are described below.

FEDERAL PLANS, POLICIES, AND REGULATIONS

National Climate Action Plan

In June 2013, President Obama enacted a national Climate Action Plan (CAP) that consisted of a wide variety of executive actions and had three pillars discussed below.

- **Cut Carbon in America** – The CAP consists of actions to help cut carbon by deploying clean energy such as cutting carbon from power plants, promoting renewable energy, and unlocking long-term investment in clean energy innovation.
- **Prepare the United States for Impacts of Climate Change** – The CAP consists of actions to help prepare for the impacts of climate change through building stronger and safer communities and infrastructure by supporting climate resilient investments, supporting communities and tribal areas as they prepare for impacts, and boosting resilience of building and infrastructure; protecting the economy and natural resources by identifying vulnerabilities, promoting insurance leadership, conserving land and water resources, managing drought, reducing wildfire risks, and preparing for future floods; and using sound science to manage climate impacts.

- **Lead International Efforts** – The CAP consists of actions to help the United States lead international efforts through working with other countries to take action by enhancing multilateral engagements with major economies, expanding bilateral cooperation major emerging economies, combating short-lived climate pollutants, reducing deforestation and degradation, expanding clean energy use and cutting energy waste, global free trade in environmental goods and services, and phasing out subsidies that encourage wasteful use of fossil fuels and by leading efforts to address climate change through international negotiations.

Energy Independence and Security Act

On December 19, 2007, President Bush signed the Energy Independence and Security Act of 2007. Among other key measures, the act includes the following, which should aid in the reduction of national GHG emissions:

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

Federal Clean Air Act

The federal Clean Air Act requires the USEPA to define national ambient air quality standards to protect public health and welfare in the U.S. Although the Act does not specifically regulate GHG emissions, the U.S. Supreme Court ruled on April 2, 2007 in *Massachusetts v. U.S. Environmental Protection Agency* that GHGs are pollutants that can be regulated under the Clean Air Act. Currently, there are no federal regulations that establish ambient air quality standards for GHGs.

The USEPA Administrator determined that atmospheric concentrations of GHGs endanger the public health and welfare within the meaning of Section 202(a) of the CAA, and on December 7, 2009, the EPA Administrator signed two findings regarding greenhouse gases under Section 202(a) of the Clean Air Act that include:

- **Endangerment Finding:** The current and projected concentrations of the six key well-mixed greenhouse gases—carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride—in the atmosphere threaten the public health and welfare of current and future generations. The EPA also found that the combined emissions of these GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that endangers public health and welfare under Clean Air Act Section 202(a). Subsequently, federal agencies have adopted specific GHG-related regulations and initiatives, including the following.

- **EPA and National Highway Traffic Safety Administration Standards to Cut Greenhouse Gas Emissions and Fuel Use for New Motor Vehicles:** coordinated steps to enable the production of a new generation of clean vehicles. Renewable Fuel Standard Program: transportation fuel sold in the United States is required to contain a minimum volume of renewable fuel.
- **Stationary Sources:** On May 13, 2010, the EPA set GHG emissions thresholds to define when permits under the New Source Review PSD and Title V Operating Permit programs are required for new and existing industrial facilities. This final rule “tailors” the requirements of these CAA permitting programs to limit covered facilities to the nation’s largest GHG emitters: power plants, refineries, and cement production facilities.
- **Timing of Applicability of the PSD Permitting Program to GHGs:** On March 29, 2010, the EPA completed its reconsideration of the December 18, 2008, memorandum entitled “EPA’s Interpretation of Regulations that Determine Pollutants Covered by Federal Prevention of Significant Deterioration (PSD) Permit Program” (the so-called “Johnson memo”). The final action confirmed that GHGs become covered under the PSD program on January 2, 2011, when the cars rule took effect.

In June 2014, the U.S. Supreme Court ruled that the EPA cannot classify facilities as major PSD or Title V sources based solely on its GHG emissions meeting the major source threshold. However, the Supreme Court said that the EPA could continue to require that PSD permits, required due to criteria pollutant emissions, contain Best Available Control Techniques (BACT) limits for GHG emissions. This ruling struck down Step 2 of the Tailoring Rule but kept in effect Step 1.

- **EPA and National Highway Traffic Safety Administration Standards to Cut Greenhouse Gas Emissions and Fuel Use for New Motor Vehicles:** coordinated steps to enable the production of a new generation of clean vehicles. Renewable Fuel Standard Program: transportation fuel sold in the United States is required to contain a minimum volume of renewable fuel.
- **Cause or Contribute Finding:** The combined emissions of these well-mixed greenhouse gases from new motor vehicles and new motor vehicle engines contribute to greenhouse gas pollution, which threatens public health and welfare.

These findings do not impose requirements on developments or agencies. However, this was a prerequisite for implementing emissions standards for vehicles.

Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards for vehicles in model years 2011 to 2016 (first phase of standards) and 2017 to 2025 (second phase) provide strict fuel economy requirements. These standards are projected to result in an average industry fleetwide level of 163 grams/mile of carbon dioxide (CO₂) in model year 2025, which is equivalent to 54.5 miles per gallon (mpg) if achieved exclusively through fuel economy improvements. The program is projected to:

- Cut 6 billion metric tons of GHG over the lifetimes of the vehicles sold in model years 2012-2025.
- Save families more than \$1.7 trillion in fuel costs.
- Reduce America’s dependence on oil by more than 2 million barrels per day in 2025.

As part of the 2017-2025 standards rulemaking, USEPA, National Highway Traffic Safety Administration, and California Air Resources Board are to complete an evaluation of standards for vehicle model years 2022-2025.

CLEAN POWER PLAN

On August 3, 2015, President Obama and the USEPA announced the Clean Power Plan. The Clean Power Plan sets standards to reduce carbon dioxide emissions by 32 percent from 2005 levels by 2030. This Plan establishes final emissions guidelines for states to follow in developing plans to reduce GHG emissions from existing fossil fuel-fired electric generating units. Specifically, the USEPA established: (1) carbon dioxide emission performance rates representing the best system of emission reduction for fossil fuel-fired electric utility steam generating units and stationary combustion turbines; (2) state-specific CO₂ goals reflecting the CO₂ emission performance rates; and (3) guidelines for the development, submittal and implementation of state plans that establish emission standards or other measures to implement the CO₂ emission performance rates, which may be accomplished by meeting the state goals. Overall, this rule will reduce CO₂ emissions from the utility power sector (Obama, 2015).

STATE PLANS, POLICIES, AND REGULATIONS

A variety of statewide rules and regulations have been implemented or are in development in California that mandate the quantification or reduction of GHGs. Several gubernatorial Executive Orders establish statewide GHG reduction goals. As a result of Senate Bill 97, the California Environmental Quality Act (CEQA) requires an analysis and mitigation of emissions of GHGs and climate change in relation to a proposed project, where a project will result in a significant increase of GHG emissions.

Assembly Bill 1493 – Pavley

In 2002, California legislature adopted regulations to reduce GHG emissions in the transportation sector. In September 2004, pursuant to AB 1493, the CARB approved regulations to reduce GHG emissions from new motor vehicles beginning with the 2009 model year. In September 2009, CARB adopted amendments to the Pavley regulations to reduce GHG from 2009 to 2016. CARB, EPA, and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have coordinated efforts to develop fuel economy and GHG standards for model 2017-2025 vehicles. The GHG standards are incorporated into the "Low Emission Vehicle" (LEV) Regulations.

Executive Order S-3-05 – Statewide Emission Reduction Targets

Executive Order S-3-05 was established by Governor Arnold Schwarzenegger in June 2005. Executive Order S-3-05 establishes statewide emission reduction targets through the year 2050:

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

Assembly Bill 32, Global Warming Solutions Act of 2006

In furtherance of the goals established in Executive Order S-3-05, the legislature enacted AB 32 to mandate the quantification and reduction of GHGs to 1990 levels by the year 2020. The law establishes periodic targets for reductions, and requires certain facilities to report emissions of GHGs annually. The legislation authorizes CARB to reduce emissions from certain sectors that contribute the most to statewide emissions of GHGs.

Under AB 32, CARB must adopt regulations requiring the reporting and verification of statewide GHG emissions. This program will be used to monitor and enforce compliance with the established standards. CARB is also required to adopt rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 allows CARB to adopt market-based compliance mechanisms to meet the specified requirements. Finally, CARB is ultimately responsible for monitoring compliance and enforcing any rule, regulation, order, emission limitation, emission reduction measure, or market-based compliance mechanism adopted.

The first action under AB 32 resulted in the adoption of a report listing early action GHG emission reduction measures on June 21, 2007. The early actions include three specific GHG control rules. On October 25, 2007, CARB approved an additional six early action GHG reduction measures under AB 32. The three original early-action regulations meeting the narrow legal definition of “discrete early action GHG reduction measures” include:

- A low-carbon fuel standard to reduce the “carbon intensity” of California fuels
- Reduction of refrigerant losses from motor vehicle air conditioning system maintenance to restrict the sale of “do-it-yourself” automotive refrigerants
- Increased methane capture from landfills to require broader use of state-of-the-art methane capture technologies.

The additional six early-action regulations, which were also considered “discrete early action GHG reduction measures,” consist of:

- Reduction of aerodynamic drag, and thereby fuel consumption, from existing trucks and trailers through retrofit technology.
- Reduction of auxiliary engine emissions of docked ships by requiring port electrification.
- Reduction of PFCs from the semiconductor industry.
- Reduction of propellants in consumer products (e.g., aerosols, tire inflators, and dust removal products).
- Requirements that all tune-up, smog check, and oil change mechanics ensure proper tire inflation as part of overall service in order to maintain fuel efficiency.
- Restriction on the use of SF₆ from non-electricity sectors if viable alternatives are available.

As required under AB 32, on December 6, 2007, CARB approved the 1990 GHG emissions inventory, thereby establishing the emissions limit for 2020. The 2020 emissions limit was set at 427 MTCO₂E. In addition to the 1990 emissions inventory, CARB also adopted regulations requiring mandatory

reporting of GHGs for large facilities that account for 94% of GHG emissions from industrial and commercial stationary sources in California. About 800 separate sources fall under the new reporting rules and include electricity generating facilities, electricity retail providers and power marketers, oil refineries, hydrogen plants, cement plants, cogeneration facilities, and other industrial sources that emit CO₂ in excess of specified thresholds.

On December 11, 2008, CARB approved the *Climate Change Proposed Scoping Plan: A Framework for Change* (Scoping Plan; CARB 2008) to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions. The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program.

The key elements of the Scoping Plan include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards.
- Achieving a statewide renewables energy mix of 33 percent.
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85% of California's GHG emissions.
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets.
- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard (LCFS).
- Creating targeted fees, including a public goods charge on water use, fees on high GWP gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

The AB 32 Scoping Plan also anticipates that local government actions will result in reduced GHG emissions because local governments have the primary authority to plan, zone, approve, and permit development to accommodate population growth and the changing needs of their jurisdictions¹. The Scoping Plan also relies on the requirements of Senate Bill (SB) 375 (discussed below) to align local land use and transportation planning for achieving GHG reductions.

The Scoping Plan must be updated every five years to evaluate AB 32 policies and ensure that California is on track to achieve the 2020 GHG reduction goal. In 2014, CARB released the First Update to the Scoping Plan, which builds upon the Initial Scoping Plan with new strategies and recommendations. The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon

¹ California Air Resources Board. Climate Change Scoping Plan, December 2008. Available online at: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf

investments. This update defines CARB's climate change priorities for the next five years and sets the groundwork to reach long-term goals set forth in Executive Order S-3-05. The update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals in the original 2008 Scoping Plan. It also evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use.

Senate Bill 1368

In September 2006, Governor Schwarzenegger signed SB 1368, which requires the California Energy Commission (CEC) to develop and adopt regulations for GHG emissions performance standards for the long-term procurement of electricity by local publicly owned utilities. These standards must be consistent with the standards adopted by the California Public Utilities Commission (CPUC). This effort will help protect energy customers from financial risks associated with investments in carbon-intensive generation by allowing new capital investments in power plants whose GHG emissions are as low or lower than new combined-cycle natural gas plants, by requiring imported electricity to meet GHG performance standards in California, and by requiring that the standards be developed and adopted in a public process.

Executive Order S-1-07

Issued on January 18, 2007, Executive Order S-1-07 sets a declining Low Carbon Fuel Standard (LCFS) for GHG emissions measured in CO₂e gram per unit of fuel energy sold in California. The target of the LCFS is to reduce the carbon intensity of California passenger vehicle fuels by at least 10% by 2020. The carbon intensity measures the amount of GHG emissions in the lifecycle of a fuel, including extraction/feedstock production, processing, transportation, and final consumption, per unit of energy delivered. CARB adopted the implementing regulation in April 2009. The regulation is expected to increase the production of biofuels, including those from alternative sources such as algae, wood, and agricultural waste. In addition, the LCFS would drive the availability of plug-in hybrid, battery electric, and fuel-cell power motor vehicles. The LCFS is anticipated to lead to the replacement of 20% of the fuel used in motor vehicles with alternative fuels by 2020.

Senate Bill 375

In August 2008, the legislature passed and on September 30, 2008, Governor Schwarzenegger signed SB 375 (Steinberg), which addresses GHG emissions associated with the transportation sector through regional transportation and sustainability plans. Regional GHG reduction targets for the automobile and light-truck sector for 2020 and 2035, as determined by CARB, are required to consider the emission reductions associated with vehicle emission standards (see SB 1493), the composition of fuels (see Executive Order S-1-07), and other CARB-approved measures to reduce GHG emissions. Regional metropolitan planning organizations (MPOs) will be responsible for preparing a Sustainable Communities Strategy (SCS) within their Regional Transportation Plan (RTP). The goal of the SCS is to establish a development plan for the region, which, after considering transportation measures and policies, will achieve, if feasible, the GHG reduction targets. If an SCS is unable to achieve the GHG

reduction target, an MPO must prepare an Alternative Planning Strategy demonstrating how the GHG reduction target would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. SB 375 provides incentives for streamlining CEQA requirements by substantially reducing the requirements for “transit priority projects,” as specified in SB 375, and eliminating the analysis of the impacts of certain residential projects on global warming and the growth-inducing impacts of those projects when the projects are consistent with the SCS or Alternative Planning Strategy. On September 23, 2010, CARB adopted the SB 375 targets for the regional MPOs. The targets for the San Diego Association of Governments (SANDAG) are a 7% reduction in emissions per capita by 2020 and a 13% reduction by 2035. Achieving these goals through adoption of a SCS will be the responsibility of the MPOs.

Executive Order S-21-09 Renewable Portfolio Standard

On September 15, 2009, Governor Schwarzenegger issued Executive Order S-21-09. This Executive Order directed CARB to adopt a regulation consistent with the goal of Executive Order S-14-08 by July 31, 2010. CARB is further directed to work with the CPUC and CEC to ensure that the regulation builds upon the Renewable Portfolio Standard (RPS) program and is applicable to investor-owned utilities, publicly owned utilities, direct access providers, and community choice providers. Under this order, CARB is to give the highest priority to those renewable resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health and can be developed the most quickly in support of reliable, efficient, cost-effective electricity system operations. On September 23, 2010, CARB adopted regulations to implement a “Renewable Electricity Standard,” which would achieve the goal of the Executive Order with the following intermediate and final goals: 20% for 2012–2014, 24% for 2015–2017, 28% for 2018–2019, and 33% for 2020 and beyond. Under the regulation, wind; solar; geothermal; small hydroelectric; biomass; ocean wave, thermal, and tidal; landfill and digester gas; and biodiesel would be considered sources of renewable energy. The regulation would apply to investor-owned utilities and public (municipal) utilities.

Senate Bill XI 2 – Renewable Portfolio Standard Expansion

On April 12, 2011, Governor Jerry Brown signed SB XI 2, which would expand the RPS by establishing a goal of 20% of the total electricity sold to retail customers in California per year, by December 31, 2013, and 33% by December 31, 2020, and in subsequent years. Under the bill, a renewable electrical generation facility is one that uses biomass, solar thermal, photovoltaic, wind, geothermal, fuel cells using renewable fuels, small hydroelectric generation of 30 megawatts (MW) or less, digester gas, municipal solid waste conversion, landfill gas, ocean wave, ocean thermal, or tidal current, and that meets other specified requirements with respect to its location. In addition to the retail sellers covered by SB 107, SB XI 2 adds local publicly owned electric utilities to the RPS. By January 1, 2012, the CPUC is required to establish the quantity of electricity products from eligible renewable energy resources to be procured by retail sellers in order to achieve targets of 20% by December 31, 2013; 25% by December 31, 2016; and 33% by December 31, 2020. The statute also requires that the governing boards for local publicly owned electric utilities establish the same targets, and the governing boards would be responsible for ensuring compliance with these targets. The CPUC will be responsible for

enforcement of the RPS for retail sellers, while the CEC and CARB will enforce the requirements for local publicly owned electric utilities.

Executive Order B-16-2012 – Zero Emission Vehicles

Executive Order B-16-2012 (March 2012) specifically focuses on reducing emissions from California's vehicle fleet and directs that California achieve a 2050 target for GHG emission reductions from the transportation sector equaling 80% less than 1990 levels. This would be accomplished by achieving benchmarks by 2020 and 2025 for advancements of zero-emission vehicle (ZEV) infrastructure and technology advancement.

Executive Order B-30-15 – 2030 Statewide Emission Reduction Target

Executive Order B-30-15 was signed by Governor Jerry Brown on April 29, 2015, establishing an interim statewide GHG reduction target of 40% below 1990 levels by 2030, which is necessary to guide regulatory policy and investments in California in the midterm, and put California on the most cost-effective path for long-term emission reductions. Under this Executive Order, all state agencies with jurisdiction over sources of greenhouse gas emissions are required to continue to develop and implement emissions reduction programs to reach the state's 2050 target and attain a level of emissions necessary to avoid dangerous climate change. According to the Governor's Office, this Executive Order is in line with the scientifically established levels needed in the United States to limit global warming below 2°C - the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels.

California Green Building Standard Code

In 2013, the California Building Standards Commission adopted the 2013 California Building Standards Code that also included the latest 2013 CALGreen Code, which became effective on January 1, 2014. The mandatory provisions of the code are anticipated to reduce 3 MMT of GHG emissions by 2020, reduce water use by 20 percent or more, and divert 50 percent of construction waste from landfills. The 2013 California Energy Code (Title 24, Part 6), which is also part of the CALGreen Code (Title 24, Part 11, Chapter 5.2), became effective on July 1, 2014.

Clean Energy Reduction Act

Clean Energy and Pollution Reduction Act of 2015, Senate Bill (SB) 350 (Chapter 547, Statutes of 2015) was approved by Governor Brown on October 7, 2015. SB 350 will (1) increase standards by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by December 31, 2030; (2) require the State Energy Resources Conservation and Development Commission to establish annual targets for statewide energy efficiency savings and demand reduction that would achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030; (3) provide for the evolution of the Independent System Operator (ISO) into a regional organization; and (4) require the state to reimburse local agencies and school districts for certain costs

mandated by the state through procedures established by statutory provisions. This Act is intended to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation (Brown, 2015).

REGIONAL PLANS, POLICIES, AND REGULATIONS

South Coast Air Quality Management District

SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. In its October 2008 document, the SCAQMD proposed the use of a percent emission reduction target (e.g., 30 percent) to determine significance for commercial/residential projects that emit greater than 3,000 metric tons (MT) per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold of 10,000 MT per year for stationary source/industrial projects where the SCAQMD is lead agency. In addition, SCAG provides a recommended threshold that is applicable to mixed-use and plan level projects that is based on a performance standard of 4.1 MTCO_{2e}/year for 2035. SCAQMD has not yet adopted any of the recommended thresholds; however, the intent is to provide thresholds that capture 90 percent of development projects.

LOCAL PLANS, POLICIES, AND REGULATIONS

City of Inglewood Climate Action Plan

The City adopted the Inglewood Energy and Climate Action Plan (ECAP) in March 2013. The Inglewood ECAP does not provide CEQA thresholds of significance, but provides a roadmap for achieving the state's goal for GHG emission reduction targets and encourages the City to grow in a more sustainable manner. The ECAP contains the following:

- **Emissions Inventory:** Expands the City's 1990, 2005, and 2007 greenhouse gas inventory to include an inventory of 2010 emissions. The ECAP also includes a year 2010 inventory of electricity and natural gas consumed.
- **Emissions Reduction Target/Goal:** Establishes a 2020 emissions reduction target of 15 percent below 2005 levels and a 2035 emission reduction goal of 32.5 percent below 2005 levels.
- **Emission Reduction Strategies:** The ECAP contains energy and greenhouse gas emissions reduction strategies. Particular attention is provided to budget-neutral measures that will reduce the community-wide energy consumption and greenhouse gas emissions in order to meet the statewide emissions targets identified in the ARB's Scoping Plan and Executive Order S-03-05.
- **Implementation Program:** Identifies the timeline for implementing each strategy, relative cost, and any additional analysis and/or legislative action needed.
- **Streamlined CEQA Review:** The ECAP serves as a tiering document for the streamlined review of project-level greenhouse gas emissions under CEQA for projects proposed within the City's jurisdiction.

4.G.3 ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere are called greenhouse gases (GHGs). The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long term global temperature increases.

The principal GHGs are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), sulfur hexafluoride (SF₆), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different warming potential and CO₂ is the most common reference gas for climate change, GHG emissions are often quantified and reported as CO₂ equivalents (CO_{2e}). For example, SF₆ is a GHG commonly used in the utility industry as an insulating gas in circuit breakers and other electronic equipment. SF₆, while comprising a small fraction of the total GHGs emitted annually world-wide, is a much more potent GHG with 22,800 times the global warming potential as CO₂. Therefore, an emission of one metric ton (MT) of SF₆ could be reported as an emission of 22,800 MT of CO_{2e}. Large emission sources are reported in million metric tons (MMT) of CO_{2e}. The principal GHGs are described below, along with their global warming potential.

- **Carbon dioxide:** Carbon dioxide (CO₂) is an odorless, colorless, natural greenhouse gas. Carbon dioxide's global warming potential is 1. Natural sources include decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing. Anthropogenic (manmade) sources are from burning coal, oil, natural gas, and wood.
- **Methane:** Methane (CH₄) is a flammable gas, and is the main component of natural gas. It has a lifetime of 12 years, and its global warming potential is 28. Methane is extracted from geological deposits (natural gas fields). Other sources are landfills, fermentation of manure, and decay of organic matter.
- **Nitrous oxide:** Nitrous oxide (N₂O) (laughing gas) is a colorless greenhouse gas that has a lifetime of 121 years, and its global warming potential is 265. Sources include microbial processes in soil and water, fuel combustion, and industrial processes.
- **Sulfur hexafluoride:** Sulfur hexafluoride (SF₆) is an inorganic, odorless, colorless, and nontoxic, nonflammable gas that has a lifetime of 3,200 years and a high global warming potential of 23,500. This gas is manmade and used for insulation in electric power transmission equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas.
- **Perfluorocarbons:** Perfluorocarbons (PFCs) have stable molecular structures and only break down by ultraviolet rays about 60 kilometers above Earth's surface. Because of this, they have long lifetimes, between 10,000 and 50,000 years. Their global warming potential ranges from 7,000 to 11,000. Two main sources of perfluorocarbons are primary aluminum production and semiconductor manufacturing.
- **Hydrofluorocarbons:** Hydrofluorocarbons (HFCs) are a group of greenhouse gases containing carbon, chlorine, and at least one hydrogen atom. Their global warming potential ranges from

100 to 12,000. Hydrofluorocarbons are synthetic manmade chemicals used as a substitute for chlorofluorocarbons in applications such as automobile air conditioners and refrigerants.

Some of the potential effects in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more forest fires, and more drought years (CARB, 2009). Globally, climate change has the potential to impact numerous environmental resources through potential, though uncertain, impacts related to future air temperatures and precipitation patterns. The projected effects of global warming on weather and climate are likely to vary regionally, but are expected to include the following direct effects (IPCC, 2001):

- Higher maximum temperatures and more hot days over nearly all land areas;
- Higher minimum temperatures, fewer cold days and frost days over nearly all land areas;
- Reduced diurnal temperature range over most land areas;
- Increase of heat index over land areas; and
- More intense precipitation events.

Also, there are many secondary effects that are projected to result from global warming, including global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity. While the possible outcomes and the feedback mechanisms involved are not fully understood and much research remains to be done, the potential for substantial environmental, social, and economic consequences over the long term may be great.

GHGs are produced by both direct and indirect emissions sources. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal.

California produced 459 gross MMT/yr CO_{2e} in 2013 (CARB, 2014a). Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2012, accounting for 36 percent of total GHG emissions in the state (CARB, 2014a). This sector was followed by the electric power sector (including both in-state and out-of-state sources) (21 percent) and the industrial sector (19 percent) (CARB, 2014a).

The Inglewood Energy and Climate Action Plan (ECAP) reported that in 2010, total greenhouse gas emissions in Inglewood were 594,273 MT CO_{2e}, as shown in **Table 4.G-1**. Based on Inglewood's 2010 population, this amounts to 5.35 MT CO_{2e} per capita or 4.11 MT CO_{2e} per service population. Service population equals the total number of residents and employees within a development. In comparison, California's per capita emissions rate in 2009 was 12.3 MT CO_{2e}; however, one reason this figure may be higher than in Inglewood is the substantial amounts of industrial agricultural activity that occurs statewide. Inglewood's per capita emissions is comparable to other South Bay cities with similar proportions of source emissions. For example, in 2007, per capita emissions in Hawthorne were 4.7 MT CO_{2e} and in Gardena, 7.3 MT CO_{2e}.

The transportation sector was responsible for the majority (54%) of Inglewood's GHG emissions. Other major sources of GHG emissions were residential (21%), commercial (16%), and industrial (4%) uses.

**Table 4.G-1
Community GHG Emissions by Sector (Existing and Projected)**

	1990	2005	2007	2010	2020	2035
Community-wide Greenhouse Gas Emissions (MT CO_{2e})						
Transportation	361,061	320,254	311,854	322,042	327,998	337,352
Residential	107,924	124,872	123,062	122,429	134,843	156,574
Commercial & Municipal	87,880	97,176	99,458	95,261	106,041	124,749
Industrial	42,514	34,940	31,272	26,100	26,376	26,830
Solid Waste	27,668	19,855	16,841	16,448	16,782	17,555
Water	15,068	13,813	13,272	11,993	14,707	15,044
TOTAL	642,115	610,910	595,758	594,273	626,748	678,283
Population, Employment, and Per Capita / Per Service Area Population Emissions						
Population	109,602	112,417	111,428	109,673	111,900	117,056
Employment	40,800	32,683	33,656	31,303	35,000	36,700
Service Area Population (pop. + emp.)	140,402	145,100	145,084	140,976	146,900	153,756
Emissions Per Capita (MT CO _{2e} /pop.)	5.86	5.43	5.35	5.42	5.60	5.79
Emissions per Service Area Population (MT CO _{2e} /service area pop.)	4.57	4.21	4.11	4.22	4.27	4.41

Source: Inglewood Energy and Climate Action Plan, March 25, 2013.

The Inglewood ECAP noted that GHG emissions in Inglewood are expected to rise significantly if no reduction strategies are implemented. Inglewood's greenhouse gas emissions are projected to increase 14 percent from 594,273 MT CO_{2e} in 2010 to 678,283 MT CO_{2e} in 2035, with per capita emissions rising 8 percent to 5.79 MT CO_{2e} and per service area population emissions rising 7 percent to 4.41 MT CO_{2e}.

4.G.4 SIGNIFICANCE CRITERIA

Criteria outlined in CEQA Guidelines were used to determine the level of significance of greenhouse gas emission impacts. Appendix G of state CEQA Guidelines indicates that a project would have a significant effect if it were to:

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

4.G.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold 4.G-1: Generation of Greenhouse Gas Emissions

Impact 4.G-1: Implementation of the proposed TOD Plan would result in the emissions of GHGs from new site-specific developments. However, total GHG emissions, including construction and operational

emissions would not exceed SCAQMD's proposed efficiency level threshold. The resulting impact would be *less than significant*.

Methodology

Although GHG emissions from a single site-specific development project or a TOD Plan for an area as large as Downtown Inglewood and Fairview Heights would not cause or measurably affect global climate change, GHG emissions from multiple projects throughout the world could result in a cumulative impact with respect to global climate change. Therefore, analyses presented in this section of the Draft EIR evaluate the GHG emissions associated with construction and operation-related activities in relation to future site-specific development pursuant to the TOD Plan's direct and indirect contribution to the cumulative environmental effects of GHG emissions.

As described previously, SCAQMD has issued proposed GHG standards and guidelines; however, there is no adopted state or local threshold for determining the cumulative significance of the proposed Plan's GHG emissions. In December 2008, SCAQMD adopted a 10,000 MT/year CO_{2e} CEQA threshold to be used for industrial facilities when SCAQMD is the lead agency. Additionally, SCAQMD has proposed, but not adopted, a 3,000 MT/year CO_{2e} threshold for mixed use developments, a 3,500 MT/year CO_{2e} threshold for residential developments, and a 1,400 MT/year CO_{2e} threshold for commercial developments. SCAQMD has also recommended the use of a single numerical threshold of 3,000 MT/year CO_{2e} for all non-industrial projects.

These proposed thresholds were developed for individual land use projects and are not related to large land use planning projects such as the proposed TOD Plan. For larger projects that do not meet any of the above screening thresholds, SCAQMD has proposed an efficiency threshold of 4.6 MT CO_{2e} per service population (SCAQMD, 2010). Service population equals the total number of residents and employees within a development. These draft threshold options have not been adopted as of the public review period of this EIR.

For the purposes of this analysis, the most appropriate threshold for the proposed TOD Plan would be the 4.6 MT CO_{2e} per year efficiency threshold because it is a land use plan that would be implemented over numerous years, to which the other SCAQMD thresholds do not apply.

Construction Emissions

SCAQMD recommends the use of CalEEMod for estimating construction and operational emissions associated with land use projects. CalEEMod incorporates the most recent versions of Emission Factor (EMFAC) and Off-Road Emissions (OFF-ROAD) models developed by CARB. CalEEMod estimates the emissions of CO₂, CH₄, and N₂O as well as the resulting total CO_{2e} emissions associated with construction-related GHG sources such as off-road construction equipment, material delivery trucks, soil haul trucks, and construction worker vehicles. As CalEEMod currently uses IPCC's 1996 SAR to assign the GWPs for CH₄ and N₂O, the emissions for these two GHGs were taken from the CalEEMod outputs and converted to CO_{2e} emissions outside of CalEEMod using the updated GWPs from IPCC's AR4. The GHG analysis incorporates similar assumptions as the air quality analysis for consistency. Based on SCAQMD's 2008 Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG)

Significance Threshold document, SCAQMD recommends that for construction GHG emissions the total emissions for a project be amortized over a 30-year period and added to its operational emission estimates (SCAQMD, 2008).

Short-term construction-generated emissions of GHG's associated with future site-specific development pursuant to the proposed TOD Plan were modeled using the California default values where specific information was not available. Reasonable assumptions based on the anticipated build out of the TOD Plan and default model settings were used to estimate criteria air pollutant and ozone precursor emissions. GHG emissions from construction activities are associated with emissions from the construction vehicles.

Because of the uncertainty of the specific timing and methods of construction activities for future site-specific development projects that would occur under the proposed TOD Plan, a worst-case construction scenario is analyzed in this EIR. Build out of the TOD Plan is anticipated to occur over 20 years with the location, type, and timing of construction determined by market demand. As previously discussed in Section 4.F, *Air Quality*, it was conservatively assumed that up to 10 percent of new development could occur in any given year. Although construction activities for that level of development would not necessarily occur on any given day, it is conservatively assumed that up to 10 percent of new development could occur on the peak construction day during the 20-year buildout of the TOD Plan. Thus, a "maximum construction day" is analyzed in this EIR. Modeling input and output files are provided in Appendix C.

Operations Impacts

Operational emissions of GHGs, including GHGs generated by direct and indirect sources, are estimated according to the recommended methodologies from SCAQMD described above. Direct sources include emissions such as vehicle trips, natural gas consumption, and landscape maintenance. Indirect sources include off-site emissions occurring as a result of the TOD Plan operations such as electricity, water consumption, and solid waste disposal. The direct and indirect emissions generated during the TOD Plan operations were estimated using CalEEMod. Similar to the calculation of the construction-related GHG emissions, the operational emissions of CH₄ and N₂O were extracted from the CalEEMod output file and converted to CO₂e emissions using the GWPs from IPCC's AR4. Modeling was based on TOD Plan data (e.g., size and type of proposed uses) and vehicle trip information from the Traffic Study prepared for the TOD Plan (Iteris, 2016). Annual operational GHG emissions associated with the existing uses within the Plan area were also calculated using CalEEMod and subtracted from the estimated annual operational emissions to properly assess the net increase in emissions that would occur from operation of build out of the TOD Plan.

Impact Assessment

Construction Emissions

Construction activities would occur intermittently at different sites within the TOD Plan areas through the Plan's estimated 20-year build out. The site-specific development projects that would occur pursuant to the TOD Plan would be temporary at any one location, but numerous site-specific

development projects are anticipated to occur through buildout of the proposed TOD Plan. Construction of site-specific development projects pursuant to the proposed TOD Plan would create new sources of GHG, and could contribute to global climate change impacts. Construction activities would result in the emission of GHGs from equipment exhaust, construction-related vehicular activity and construction worker automobile trips. Emission levels for construction activities would vary depending on the number and type of equipment, duration of use, operation schedules, and the number of construction workers.

Total estimated construction-related GHG emissions for the proposed TOD Plan would be approximately 1,743.91 MT/yr CO_{2e}. This is based on the maximum construction year, which represents approximately 10 percent of total construction. Thus, amortized over 30 years per SCAQMD methodology, annual construction emissions would equal approximately 581.3 MT/yr CO_{2e} per year.

Operational Emissions

Area and indirect sources associated with the proposed TOD Plan would primarily result from mobile transportation sources, electricity and natural gas consumption, water transport (the energy used to pump water), and solid waste generation from new land uses that would be implemented by the TOD Plan). GHG emissions from electricity consumed within the TOD Plan area would be generated off-site by fuel combustion at the electricity provider. GHG emissions from water transport are also indirect emissions resulting from the energy required to transport water from its source. In addition, the growth under the proposed TOD Plan would generate GHG emissions from motor vehicle trips.

The estimated operational GHG emissions that would be generated from implementation of the TOD Plan are shown in Table 4.G-2. Additionally, in accordance with SCAQMD's recommendation, amortized construction-related GHG emissions are added to the operational emissions estimate in order to determine the total annual GHG emissions. The annual operational GHG emissions associated with the existing uses in the TOD Plan area, which would be replaced by new development within the TOD Plan areas, were also calculated using CalEEMod and subtracted from the estimated annual GHG emissions to properly assess the net increase in emissions that would occur from Plan implementation.

As shown in Table 4.G-2, the proposed TOD Plan's total net annual GHG emissions would be approximately 54,948 MTCO_{2e} per year (detailed calculations are included in Appendix C). Given a service population (total of residents at full occupancy and full employment at build out) increase of 14,748, annual per service population GHG emissions for the proposed TOD Plan would be 3.77 MT/yr CO_{2e}. This would not exceed SCAQMD's proposed efficiency level threshold of 4.6 MT/yr CO_{2e}.

Significance Conclusion for Impact 4.G-1

Total GHG emissions, including construction and operational emissions (3.77 MT/yr CO_{2e}), would not exceed SCAQMD's proposed efficiency level threshold of 4.6 MT/yr CO_{2e}. Therefore, the net increase in GHG emissions resulting from implementation of the TOD Plan would be less than significant, and no mitigation measures are required.

**Table 4.G-2
Estimated Construction and Operations-Related GHG Emissions**

Emission Source	Estimated Emissions CO ₂ e (MT/yr)
Construction	
Annual Mitigated Construction (Amortized over 30 years)	581.30
Project Operations	
Area Sources	1,187.27
Energy Consumption^a	9,365.77
Mobile Sources	32,281.90
Solid Waste	6,380.39
Water Consumption^b	5,732.67
Total (Construction and Operational Emissions)	55,829.32
Service Population	14,748
CO₂e/ Service Population	3.77
Greater than 4.6 MTCO₂e per service population?	No

NOTES: CO₂e= carbon dioxide equivalent; MT/yr = metric tons per year; %=percent.

- a The energy-related GHG emissions, as estimated by CalEEMod, use 2008 Title 24 energy usage rates. However, according to the CEC, nonresidential buildings that are constructed in accordance with the 2013 Building and Energy Efficiency Standards would be 15 percent more energy efficient than the 2008 Standards. As such, this additional reduction in energy consumption was accounted for in the estimated GHG emissions associated with energy consumption.
- b GHG emissions reductions associated with water use resulting from compliance with CALGreen requirements, which requires a minimum 20 percent reduction in indoor water use and the provision of irrigation controllers for outdoor water use, were accounted for in CalEEMod model run.

Source: Entech Consulting Group, 2016

Threshold 4.G-2: Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

Impact 4.G-2: Implementation of the proposed TOD would result in an increase in GHG emissions. However, these emissions would be below SCAQMD’s proposed efficiency threshold, which indicates compliance with statewide GHG emissions reduction goals. In addition, the TOD Plan provides for enhanced access to transit and improved pedestrian and bicycle facilities, and would implement the provisions of the City’s ECAP, impacts would be *less than significant*.

Methodology

A significant impact would occur if GHG emissions resulting from implementation of the proposed TOD Plan would exceed applicable threshold levels set forth in plans and programs.

The threshold recommended by the SCAQMD of 4.6 metric tons of CO₂e per service population annually or more (“efficiency threshold”) is consistent with California Climate Change Scoping Plan GHG emissions reduction targets for which its set of strategies were developed to reduce GHG emissions statewide. Thus, a project could not exceed the efficiency threshold of 4.6 metric tons of CO₂e per service population annually without also conflicting with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (California Climate Change Scoping Plan). Therefore, one measure used to determine the TOD Plan’s consistency with applicable GHG reduction plans and program is to determine annual GHG emissions per service population. If these emissions would exceed 4.6 metric tons of CO₂e per service population annually, a significant impact would result. In addition, the proposed TOD Plan was reviewed for consistency with provisions of the City’s ECAP to determine compliance.

Impact Assessment

The proposed TOD Plan provides for the transit oriented land uses within the Downtown Inglewood and Fairview heights areas intended to increase use of existing transit, bicycle, and pedestrian circulation, which would result in a reduction of vehicle miles traveled (as evidenced in the GHG modeling presented in Appendix C) and related GHG emissions. The proposed TOD Plan enhances access to transit, and provides improved facilities for active transportation (e.g., walking, biking). In addition, the proposed TOD Plan provides standards that require new development to meet, at minimum, CALGreen Building requirements, be sustainably designed, and pedestrian-oriented.

The proposed TOD Plan emphasizes new land uses in areas proximate to new Metro stations, and includes enhanced access to those stations to minimize vehicle trip generation and associated GHG emissions. Additionally, the proposed TOD Plan lays out a coordinated circulation plan that would enhance multi-modal relationships. This is consistent with the intent of the AB 32 Scoping Plan as it provides GHG emissions reductions to help the state meet the legislative targets. In addition, the TOD Plan is consistent with SB 375, which is focused on changing land use patterns and improving transportation alternatives.

Collectively, the standards, policies, and programs that would be implemented with the proposed TOD Plan would help reduce GHG emissions that would inevitably result from both the construction and operation of new land uses over the planning horizon (2040) of the proposed TOD Plan. While GHG emissions would occur from the increase in population and the resulting use of electricity, water, and fuels and generation of wastewater and solid waste, the proposed TOD Plan would provide new land uses in a sustainable manner. Therefore, the proposed TOD Plan is consistent with the state and regional GHG reduction plan, policies, and regulations that are described above.

In addition, the City’s ECAP was adopted to achieve community-wide energy consumption and greenhouse gas emissions reductions. The ECAP includes energy and GHG emissions reduction strategies and a streamlined CEQA review process for development projects to demonstrate compliance with the City’s GHG reduction strategies, which is based on a point system whereby each standard has a point value that reflects its effectiveness to reduce GHG. For a project to be fully compliant with the ECAP, an applicant must select measures that have an associated point total of 20

points. Future site-specific development within the TOD Plan areas would be subject to the provisions of the ECAP.

Therefore, the TOD Plan would not conflict with the ECAP; conversely, the TOD Plan would work to reduce GHG reductions and assist in implementing the ECAP measures.

Significance Conclusion for Impact 4.G-2

Because implementation of the proposed TOD Plan would (1) result in less-than-significant GHG emissions, (2) provide for enhanced access to transit and improved pedestrian and bicycle facilities, and (3) implement the provisions of the Inglewood ECAP, the TOD Plan would be consistent with the goals and objectives of federal, state and local plans and policies. Impacts would be less than significant, and no mitigation measures are needed.

4.G.6 REFERENCES – GREENHOUSE GAS EMISSIONS

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