

4.8 GREENHOUSE GASES

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

4.8.1 Environmental Setting

Greenhouse gases and climate change are cumulative global issues. CARB and EPA regulate GHG emissions within the State of California and the United States, respectively. While CARB has the primary regulatory responsibility within California for GHG emissions, local agencies can also adopt policies for GHG emission reduction.

Many chemical compounds in the Earth’s atmosphere act as GHGs because they absorb and emit radiation within the thermal infrared range. When radiation from the Sun reaches the Earth’s surface, some of it is reflected back into the atmosphere as infrared radiation (heat). GHGs absorb this infrared radiation and trap the heat in the atmosphere. Over time, the amount of energy from the Sun to the Earth’s surface should be approximately equal to the amount of energy radiated back into space, leaving the temperature of the Earth’s surface roughly constant. Many gases exhibit these “greenhouse” properties. Some of them occur in nature (water vapor, carbon dioxide, methane, and nitrous oxide) while others are exclusively human-made (like gases used for aerosols) (EPA 2014b).

The principal climate change gases resulting from human activity that enter and accumulate in the atmosphere are listed below:

- **Carbon Dioxide (CO₂):** CO₂ enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and chemical reactions (e.g., the manufacture of cement). CO₂ is also removed from the atmosphere (or “sequestered”) when it is absorbed by plants as part of the biological carbon cycle.
- **Methane (CH₄):** CH₄ is emitted during the production and transport of coal, natural gas, and oil. CH₄ emissions also result from livestock and agricultural practices and the decay of organic waste in municipal solid waste landfills.
- **Nitrous Oxide (N₂O):** N₂O is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.
- **Fluorinated Gases:** Hydrofluorocarbons (HFCs), perfluorinated chemicals (PFCs), and Sulfur hexafluoride (SF₆) are synthetic, powerful climate-change gases that are emitted from a variety of industrial processes. Fluorinated gases are often used as substitutes for ozone-depleting substances (i.e., chlorofluorocarbons, hydrochlorofluorocarbons, and halons). These gases are typically emitted in smaller quantities, but because they are potent climate-change gases, they are sometimes referred to as high global warming potential gases.

4.8.1.1 Emissions Inventories and Trends

California's annual statewide GHG emission inventory is an important tool for establishing historical emission trends and tracking California's progress in reducing GHGs. In concert with data collected through various California Global Warming Solutions Act (Assembly Bill [AB] 32) programs, the GHG inventory is a critical piece in demonstrating the state's progress in achieving the statewide GHG target. The inventory provides estimates of anthropogenic GHG emissions within California, as well as emissions associated with imported electricity; natural sources are not included in the inventory. The inventory for 2017 shows that California's GHG emissions continue to decrease. In 2017, emissions from GHG emitting activities statewide were 424 million metric tons of CO₂ equivalent (MMTCO_{2e}), 5 MMTCO_{2e} lower than 2016 levels and 7 MMTCO_{2e} below the 2020 GHG Limit of 431 MMTCO_{2e}. Consistent with recent years, these reductions have occurred while California's economy has continued to grow and generate jobs. Compared to 2016, California's GDP grew 3.6 percent while the carbon intensity of its economy declined by 4.5 percent. The most notable highlights in the inventory include:

- For the first time since California started to track GHG emissions, in-state and total electricity generation from zero-GHG sources (for purposes of the GHG inventory, these include solar, hydro, wind, and nuclear) exceeded generation from GHG-emitting sources.
- The transportation sector remains the largest source of GHG emissions in the state, but saw a 1 percent increase in emissions in 2017, the lowest growth rate over the past 4 years.
- Emissions from all other sectors have remained relatively constant in recent years, although emissions from high global warming potential gases have continued to increase as they replace Ozone Depleting Substances banned under the 1987 Montreal Protocol.

4.8.1.2 Potential Environmental Effects

For California, climate change in the form of warming has the potential to incur and exacerbate environmental impacts, including but not limited to changes to precipitation and runoff patterns, increased agricultural demand for water, inundation of low-lying coastal areas by sea-level rise, and increased incidents and severity of wildfire events. Although certain environmental effects are widely accepted to be a potential hazard to certain locations, such as rising sea level for low-lying coastal areas, it is currently infeasible to predict all environmental effects of climate change on any one location.

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the industrial/manufacturing, utility, transportation, residential, and agricultural sectors. Therefore, the cumulative global emissions of GHGs contributing to global climate change can be attributed to every nation, region, and city, and virtually every individual on Earth. A project's GHG emissions are at a micro-scale relative to global emissions but could result in a cumulatively considerable incremental contribution to a significant cumulative macro-scale impact.

Assembly Bill 32, California Global Warming Solutions Act (2006)

AB 32, the Global Warming Solutions Act of 2006, codified the State's GHG emissions target by directing CARB to reduce the State's global warming emissions to 1990 levels by 2020. AB 32 was signed and passed into law by Governor Schwarzenegger on September 27, 2006. Since that time, the CARB, CEC, California Public Utilities Commission (CPUC), and Building Standards Commission have all been developing regulations that will help meet the goals of AB 32 and Executive Order S-3-05.

A Scoping Plan for AB 32 was adopted by CARB in December 2008. It contains the state's main strategies to reduce GHGs from business-as-usual emissions projected in 2020 back down to 1990 levels. Business-as-usual is the projected emissions in 2020, including increases in emissions caused by growth, without any GHG reduction measures. The Scoping Plan has a range of GHG reduction actions, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

Senate Bill 375, California's Regional Transportation and Land Use Planning Efforts (2008)

California enacted legislation (SB 375) to expand the efforts of AB 32 by controlling indirect GHG emissions caused by urban sprawl. SB 375 provides incentives for local governments and applicants to implement new conscientiously planned growth patterns. This includes incentives for creating attractive, walkable, and sustainable communities and revitalizing existing communities. The legislation also allows applicants to bypass certain environmental reviews under CEQA if they build projects consistent with the new sustainable community strategies. Development of more alternative transportation options that would reduce vehicle trips and miles traveled, along with traffic congestion, would be encouraged. SB 375 enhances CARB's ability to reach the AB 32 goals by directing the agency in developing regional GHG emission reduction targets to be achieved from the transportation sector for 2020 and 2035. CARB works with the metropolitan planning organizations (e.g., ABAG and MTC) to align their regional transportation, housing, and land use plans to reduce VMT and demonstrate the region's ability to attain its GHG reduction targets. A similar process is used to reduce transportation emissions of ozone precursor pollutants in the Bay Area.

SB 350 Renewable Portfolio Standards

In September 2015, the California Legislature passed SB 350, which increases the states Renewables Portfolio Standard for content of electrical generation from the 33 percent target for 2020 to a 50 percent renewables target by 2030.

Executive Order EO-B-30-15 (2015) and SB 32 GHG Reduction Targets

In April 2015, Governor Brown signed Executive Order EO-B-30-15, which extended the goals of AB 32, setting a GHG emissions target at 40 percent of 1990 levels by 2030. On September 8, 2016, Governor Brown signed SB 32, which legislatively established the GHG reduction target of 40 percent of 1990 levels by 2030. In November 2017, CARB issued California's 2017 Climate Change Scoping Plan. While the state is on track to exceed the AB 32 scoping plan 2020 targets, this plan is an update to reflect the enacted SB 32 reduction target.

The new Scoping Plan establishes a strategy that will reduce GHG emissions in California to meet the 2030 target:

- Implement the Cap-and-Trade program that places a firm limit on 80 percent of the state's emissions;
- Achieve a 50-percent Renewable Portfolio Standard by 2030 (currently at about 29 percent statewide);
- Increase energy efficiency in existing buildings;
- Develop fuels with an 18-percent reduction in carbon intensity;
- Develop more high-density, transit-oriented housing;
- Develop walkable and bikeable communities;
- Greatly increase the number of electric vehicles on the road and reduce oil demand in half;
- Increase zero-emissions transit so that 100 percent of new buses are zero emissions;
- Reduce freight-related emissions by transitioning to zero emissions where feasible and near-zero emissions with renewable fuels everywhere else; and

- Reduce “super pollutants” by reducing methane and hydrofluorocarbons or HFCs by 40 percent.

In the updated Scoping Plan, CARB recommends statewide targets of no more than 6 metric tons of carbon dioxide equivalent (MTCO_{2e}) per capita (statewide) by 2030 and no more than 2 MTCO_{2e} per capita by 2050. The statewide per capita targets account for all emissions sectors in the state, statewide population forecasts, and the statewide reductions necessary to achieve the 2030 statewide target under SB 32 and the longer-term state emissions reduction goal of 80 percent below 1990 levels by 2050.

Greenhouse Gas Significance Thresholds

BAAQMD’s current CEQA Air Quality Guidelines currently recommends two project-specific thresholds and one plan-level threshold. Since the proposed project does not involve the preparation of a General Plan or Specific Plan, only the project-level thresholds are discussed further. The two project-level thresholds are a bright-line threshold of 1,100 MTCO_{2e} and a GHG efficiency threshold of 4.6 MTCO_{2e} per service population. The bright-line numeric threshold of 1,100 MTCO_{2e} per year is a numeric emissions level below which a project’s contribution to global climate change would be less than “cumulatively considerable.” For projects that are above this bright-line cut-off level, emissions from these projects would still be less than cumulatively significant if the project as a whole would result in an efficiency of 4.6 MTCO_{2e} per service population or better for mixed-use projects. Both thresholds were developed based off the 1990 state inventory and reductions identified to meet AB 32 targets for the year 2020. The GHG efficiency threshold was derived from looking at the land use inventory sector and statewide population and employment projections for AB 32 targets.

Post-2020

Given the recent legislative attention and case law regarding post-2020 goals and the scientific evidence that additional GHG reductions are needed through 2050 to stabilize CO₂ concentrations, the Association of Environmental Professionals’ Climate Change Committee (2016) recommended in its Beyond 2020: The Challenges of Greenhouse Gas Reduction Planning by Local Governments in California white paper that CEQA analyses for most land use development projects can continue to rely on current thresholds for the immediate future, but that long-term projects should consider “post-2020 emissions consistent with ‘substantial progress’ along a post-2020 reduction trajectory toward meeting the 2050 target.” The Beyond 2020 white paper further recommends that the “significance determination... should be based on consistency with ‘substantial progress’ along a post-2020 trajectory.”

Project-Specific GHG Thresholds

As discussed above, for quantified emissions, the BAAQMD Guidelines recommend a GHG threshold of 1,100 metric tons or 4.6 metric tons per capita. These thresholds were developed based on meeting the 2020 GHG targets set in the scoping plan that addressed AB 32. In the event that the operation of a project would occur beyond 2020, a threshold that addresses a future target is appropriate.

Although BAAQMD has not published a quantified threshold for 2030 yet, this assessment uses a “Substantial Progress” efficiency metric of 2.8 MTCO_{2e} per year per service population and a bright-line threshold of 660 MTCO_{2e} per year based on the GHG reduction goals of EO B-30-15. The service population metric of 2.8 is calculated for 2030 based on the 1990 inventory and the projected 2030 statewide population and employment levels (BAAQMD 2016). The 2030 bright-line threshold is a 40 percent reduction of the 2020 1,100 MTCO_{2e} per year threshold.

4.8.2 Previous Environmental Analysis

4.8.2.1 City of Daly City General Plan EIR Summary

Chapter 3.6 of the Daly City General Plan EIR discusses potential cumulative effects of GHGs within the Bay Area. As discussed in the Daly City General Plan EIR, GHG emissions are in and of themselves a significant cumulative impact. However, state regulations and implementation of General Plan policies that promote mixed uses, alternative modes of transportation, and energy efficiency would help to reduce GHG emissions to a less than significant level. Additionally, the Daly City General Plan EIR determined that the General Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

The following General Plan policies are applicable to the proposed project:

Policy HE-24: Gradually increase energy and water efficiency standards for all new and existing housing while minimizing the costs of such standards.

Policy HE-25: Mandate the inclusion of green building techniques into most new construction.

4.8.2.2 Plan Bay Area EIR Summary

The following summarizes the potential impacts related to GHGs discussed in Chapter 2.5 of the Plan Bay Area EIR and includes the complete text of mitigation measures previously identified by the Plan Bay Area EIR that are applicable to the proposed project.

Impact 2.5-2: Net Increase in Direct and Indirect GHG Emissions. The Plan Bay Area EIR determined that implementation of the Plan Bay Area would result in a net reduction in GHG emissions in 2040 when compared to existing conditions, and impacts would be less than significant. No mitigation measures were identified.

Impact 2.5-3: Conflict with Applicable Plans, Policies, or Regulations. The Plan Bay Area EIR determined that implementation of the Plan Bay Area could substantially conflict with the goal of SB 32 to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030. However, implementation of Mitigation Measure 2.5-3 would reduce potential impacts to less than significant level. Mitigation Measure 2.5-3 is not applicable to the proposed project because it is a plan level mitigation measure regarding implementation of Climate Action Plans and other regional plans for reducing GHG emissions.

Impact 2.5-4: Conflict with Local Policies or Plans. The Plan Bay Area EIR determined that implementation of the Plan Bay Area would not substantially conflict with local climate action plans or GHG reduction plans, and impacts would be less than significant. No mitigation measures were identified.

4.8.3 Project-Specific Analysis

Impact GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Impact Analysis

Thresholds

BAAQMD's current CEQA Guidelines recommend a GHG bright-line threshold of 1,100 MTCO₂e or 4.6 MTCO₂e per service population. If a project exceeds the 1,100 MTCO₂e then the project's GHG efficiency is compared to the 4.6 MTCO₂e per service population to determine significance. Notably, these thresholds were developed based on meeting the 2020 GHG targets set in the scoping plan that addressed AB 32. BAAQMD is in the process of updating its CEQA guidance. It is reasonable to base a post-2020 threshold off the same methodology BAAQMD used for developing its current recommendation.

Service Population

Currently there are 31 employees located onsite at both the child-care and office facilities. It is estimated that approximately 15 to 20 additional employees would be needed onsite, depending on the type of special needs populations ultimately served (e.g., formerly homeless, veterans, senior citizens, or transition-aged youth). These staff members would support the child-care facility and Community Center and would provide property management services for the residential units in the development. Employees for maintenance of Bayshore Park would be City employees and are not included in the estimated 15 to 20 employees for the remainder of the project site.

Consistent with the General Plan EIR assumptions and the United States Census Bureau (USCB), an average of 3.3 residents per household, with each household representing 95 percent of total housing units with a 5 percent vacancy rate (City of Daly City 2012, USCB 2019). Accordingly, 95 percent of 555 units would be 527 units, resulting in 1,739 residents. Since the Midway Village area includes 477 existing residents, the proposed project would result in 1,262 new residents. Therefore, the total new service population would be 1,282 residents plus employees.

Although BAAQMD has not published a quantified threshold for 2030 yet, this assessment uses a "Substantial Progress" efficiency metric of 2.8 MT CO₂e/year/service population and a bright-line threshold of 660 MTCO₂e/year based on the GHG reduction goals of EO B-30-15. The service population metric of 2.8 is calculated for 2030 based on the 1990 inventory and the projected 2030 statewide population and employment levels. The 2030 bright-line threshold is a 40 percent reduction of the 2020 1,100 MTCO₂e/year threshold. The 2030 thresholds were then interpolated to develop thresholds for 2026 of 836 MTCO₂e/year for the bright-line threshold and 3.5 MTCO₂e per year per service population.

Project-Specific Analysis

A project-specific analysis was completed for the proposed project. The analysis evaluated both construction and operational emissions.

Construction Emissions

Construction GHG emissions are generated from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. GHG emissions associated with construction for the proposed project are shown in Table 4.8-1.

Table 4.8-1: Construction GHG Emissions

Construction Year	MTCO ₂ e per Year
2021	461
2023	194
2024	289
2025	602
2026	625
Maximum Annual Emissions	625

As shown in Table 4.8-1, maximum annual GHG emissions are estimated to be 625 MTCO₂e. Neither the City nor BAAQMD have an adopted threshold of significance for construction related GHG emissions, though BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable.

Operational Emissions

Long-term operational GHG emissions would result from proposed project-generated vehicular traffic, onsite combustion of natural gas, operation of any landscaping equipment, offsite generation of electrical power over the life of the project, the energy required to convey water to and wastewater from the project site, and the emissions associated with the hauling and disposal of solid waste from the project site.

The CalEEMod model, along with the project vehicle trip generation rates, was used to estimate GHG emissions associated with operation of the project. Table 4.8-2 shows the operational GHG results.

Table 4.8-2: Annual GHG Emissions for the Proposed Project

Source Category	Existing Land Use in 2026	Proposed Project in 2026	Existing Use in 2030	Proposed Project in 2030
Area	5	17	5	17
Energy Consumption	301	995	270	888
Mobile	945	3,165	876	2,933
Solid Waste Generation	45	140	45	140
Water Usage	28	80	24	70
Total	1,324	4,397	1,220	4,048
Net Emissions		3,073		2,828
Significance Threshold		836 MTCO ₂ e/year		600 MTCO ₂ e/year
Service Population Emissions (MTCO ₂ e/year/service population)		2.4		2.2
Significance Threshold		3.5 in 2026		2.8 in 2030
Exceeds both thresholds?		No		No

As shown in Table 4.8-2, the 2030 net emissions (2,828 MTCO_{2e}) exceed the 660 MTCO_{2e} per year bright-line threshold. However, the service population emissions (2.2 MTCO_{2e} per year per service population) do not exceed the 2030 per capita rate. Similarly, the 2026 net emissions (3,073 MTCO_{2e}) exceed the interpolated 836 MTCO_{2e} per year bright-line threshold but do not exceed the 2026 interpolated per capita rate. To be considered significant, the project must exceed both the GHG significance threshold in metric tons per year and the service population significance threshold. Therefore, impacts would not be considered significant.

In addition, the proposed project implements the applicable operational GHG reduction strategies and sustainability measures from Plan Bay Area, as described in Section 2.3.7, Alternative Transportation, and Section 2.3.8, Sustainability. In addition, the proposed project would increase the housing density at an existing housing complex, thereby helping to reduce overall GHG emissions in the region. Therefore, the proposed project would not generate GHG emissions that would have a significant impact on the environment, and impacts would be considered less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

Impact GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis

The proposed project is consistent with and tiered off of the Plan Bay Area; the primary objective of the Plan is to achieve mandated reductions of GHG emissions and provide adequate housing for the projected 2040 regional population level pursuant to SB 375, The Sustainable Communities and Climate Protections Act of 2008. SB 375 outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's GHG emissions reduction mandates. The Plan Bay Area outlines strategies to meet or exceed the targets set by CARB. By Executive Order, approved June 25, 2018, CARB officially determined that the Plan Bay Area would, if implemented, meet CARB's 2020 and 2035 GHG emission reduction targets (CARB 2017b). The Plan Bay Area EIR found that the Plan could conflict with the goals of SB 32 unless mitigation was implemented. Mitigation for this impact includes the MTC and ABAG working with the BAAQMD and local communities to develop community-specific CAPs (Mitigation Measure 2.5.3). Although this mitigation measure is not applicable to the proposed project, Daly City has developed a CAP consistent with AB 32 and the 2020 emissions reduction target. As described above, in 2017, emissions from GHG emitting activities statewide were 7 MMTCO_{2e} below the 2020 GHG limit established by AB 32. With the adoption of SB 32, the state has codified a 2030 GHG emissions reduction target of 40 percent below 1990 levels. In the future, the City may prepare an updated CAP to address the 2030 emissions target and identify measures to determine the proposed project's consistency with SB 32. In the meantime, the table below identifies how the project is consistent with SB 32 Scoping Plan measures.

Table 4.8-3: Consistency with SB 32 2017 Scoping Plan Update

Scoping Plan Measure	Project Consistency
SB 350 50 Percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020 to 50 percent in 2030.	Consistent: The project will purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels	Not Applicable. This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency until residential housing and commercial development achieves zero net energy.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	Consistent. Vehicles accessing the project site will use fuel containing lower carbon content as the fuel standard is implemented.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario) Vehicle manufacturers will be required to meet existing regulations mandated by the low-emission vehicle (LEV) III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million zero-emission vehicles (ZEVs) on the road by 2030 and increasing numbers of ZEV trucks and buses.	Consistent. Future residents can be expected to purchase increasing numbers of more fuel efficient and zero emission cars and trucks each year. The 2019 CalGreen Code requires electrical service in multi-family dwellings as well as non-residential developments with ten or more parking spaces to be electric vehicle charger-ready. Home deliveries will be made by increasing numbers of ZEV delivery trucks.
Sustainable Freight Action Plan The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying more than 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero-emission freight vehicles and equipment powered by renewable energy by 2030.	Not Applicable. The measure applies to owners and operators of trucks and freight operations. However, home deliveries are expected to be made by increasing number of ZEV delivery trucks.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	Consistent. The project will include only natural gas hearths that produce very little black carbon compared to wood burning fireplaces and heaters.
Senate Bill 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.	Consistent. The project will provide housing in the region that is consistent with the growth projections in the 2014 Regional Transportation Plan/Sustainable Communities Strategy. The proposed project is within a transit priority area and is subject to requirements applicable to those areas.

Scoping Plan Measure	Project Consistency
<p>Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.</p>	<p>Consistent. The post-2020 Cap-and-Trade Program indirectly affects people who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the greenhouse gas emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, greenhouse gas emissions associated with California Environmental Quality Act projects' electricity usage are covered by the Cap- and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the program's first compliance period.</p>
<p>Natural and Working Lands Action Plan. The California Air Resources Board is working in coordination with several other agencies at the federal, state, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce greenhouse gas emissions and to cultivate net carbon sequestration potential for California's natural and working land.</p>	<p>Not Applicable. The project is a residential development and would not be considered natural or working lands.</p>

Source: CARB 2017b Scoping Plan Update.

The 2017 Scoping Plan would achieve the bulk of the reductions from electric power, industrial fuel combustion, and transportation. Cap-and-trade would provide between 10 and 20 percent of the required reductions depending on the amounts achieved by the other reduction measures. Although the Scoping Plan Update focuses on state agency actions necessary to achieve the 2030 GHG limit, CARB considers local governments essential partners in achieving California's goals to reduce GHG emissions. The 2030 target will require an increase in the rate of emission reductions compared to what was needed to achieve the 2020 limit, and this will require action and collaboration at all levels, including local government action to complement and support state-level actions. For individual projects, the 2030 Scoping Plan Update suggests that all new land use development implement all feasible measures to reduce GHG emissions. The Scoping Plan does not define all feasible measures or attribute an amount of reductions required from new development beyond compliance with regulations. The proposed project is consistent with GHG reductions measures through energy efficiency and sustainability measures, as well as being consistent with the Plan Bay Area, which would result in an overall net reduction in GHG emissions in 2040 when compared to existing conditions, and impacts would be less than significant.

Lastly, the proposed project would comply with all relevant GHG reduction measures and strategies listed in the City's General Plan, including promoting mixed use, alternative modes of transportation, and energy efficiency. Therefore, the proposed project would not conflict with any applicable plans, policies, or regulations adopted for the purposes of reducing GHG emissions, and impacts would be less than significant.

Level of Significance Before Mitigation

Less Than Significant Impact.

Mitigation Measures

No mitigation is necessary.

Level of Significance After Mitigation

Less Than Significant Impact.

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