

Appendix A

Scoping

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Appendix A.1

Notice of Preparation

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



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Director of Regional Planning

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Chief Deputy Director,
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NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

DATE: December 23, 2021

TO: Office of Planning and Research, Responsible Agencies, Trustee Agencies, Organizations, and Interested Parties

SUBJECT: **Notice of Preparation of a Program Environmental Impact Report and Public Scoping Meeting for the Los Angeles County 2045 Climate Action Plan**

PROJECT NAME: Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP)

PROJECT LOCATION: Unincorporated areas of Los Angeles County; see Figure 1.

The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR.

PROJECT DESCRIPTION: The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5.

POTENTIAL ENVIRONMENTAL EFFECTS: The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues:

- Air Quality
- Biological Resources
- Cultural Resources
- Noise
- Tribal Cultural Resources

PUBLIC REVIEW PERIOD: The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines.

A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence.

Please send written comments to the following address:

Thuy Hua, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

For email submittal of your comment letter, send to: climate@planning.lacounty.gov

Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the PEIR. All written comment letters/emails will be included in an appendix in the Draft PEIR and the contents considered in the preparation of the PEIR.

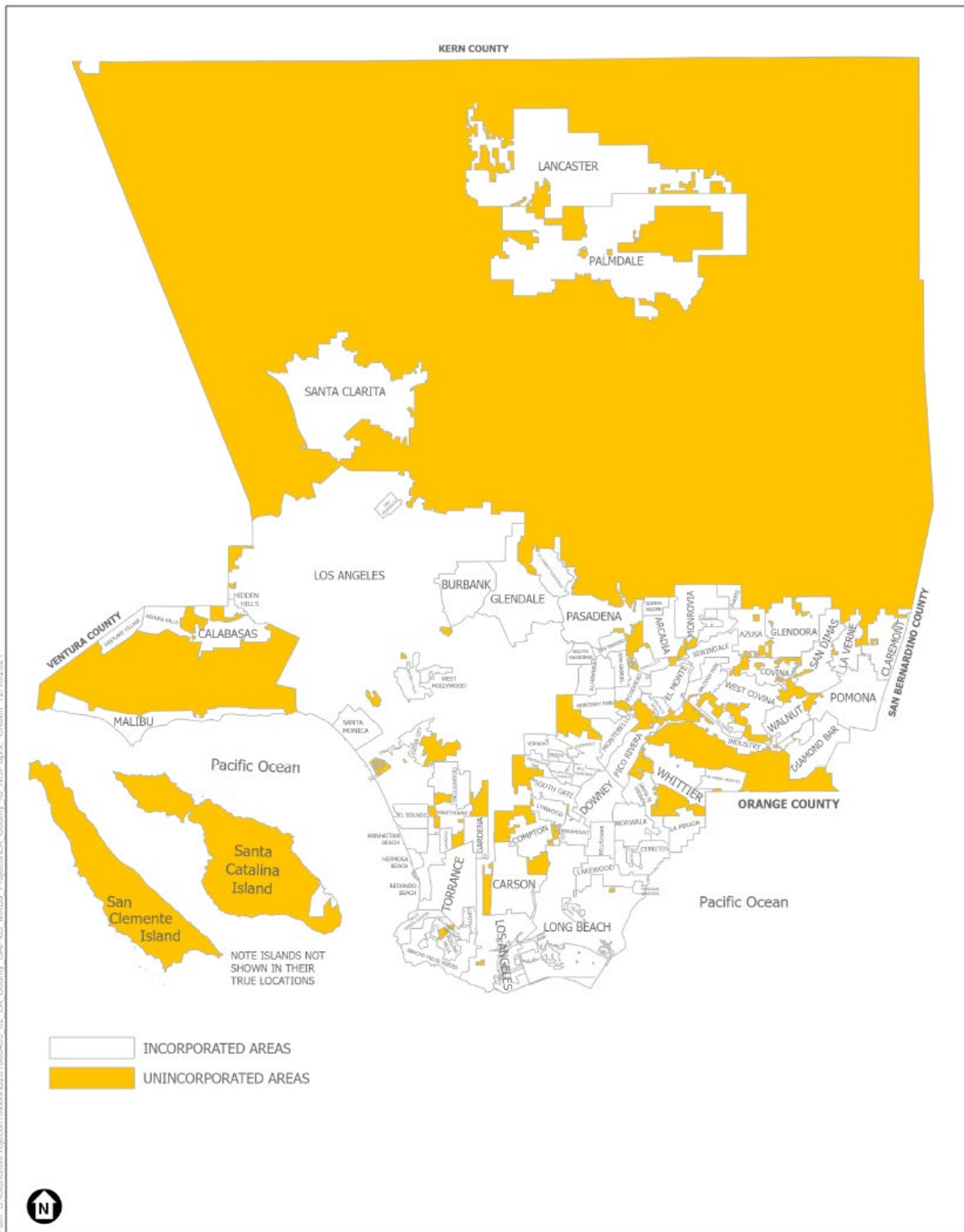
DOCUMENT AVAILABILITY AND PROJECT WEBSITE: This Notice of Preparation and the Initial Study are available for view online at: <https://planning.lacounty.gov/climate>.

NOTICE OF PUBLIC SCOPING MEETING: The County will conduct a public scoping meeting to solicit oral and written comments from interested parties on the scope and content of the PEIR. All interested parties are invited to attend the scoping meeting to assist in identifying issues to be addressed in the PEIR.

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The scoping meeting will include a brief presentation of the project scope to be addressed in the PEIR, a summary of the PEIR process, and will provide attendees with an opportunity to provide input to the scope and content of the PEIR.

The scoping meeting will be held online via Zoom on **January 13, 2022 at 5:00 p.m. PST**. Please visit <https://planning.lacounty.gov/site/climate/meetings-hearings/> to register for the meeting.



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SOURCE: Los Angeles County Climate Action Plan
 March 2020 Public Review Draft

Los Angeles County 2045 Climate Action Plan (2045 CAP)

Figure 1
 Map of Unincorporated Los Angeles County



Appendix A.2

Initial Study

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Environmental Checklist Form (Initial Study)

County of Los Angeles, Department of Regional Planning



Project title: Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP)

Lead agency name and address: Los Angeles County, 320 West Temple Street, Los Angeles, CA 90012

Contact Person and phone number: Thuy Hua, 213.974.6461

Project sponsor's name and address:

Los Angeles County Department of Regional Planning

320 West Temple Street, 13th Flr

Los Angeles, California 90012

Project location: Los Angeles County (County-wide)

APN: _____ *USGS Quad:* _____

Gross Acreage: Approximately 1,696,000 acres (approximately 2,650 square miles)

General plan designation: Implementation of the Draft 2045 CAP, once approved, would occur throughout unincorporated Los Angeles County in all General Plan designations.

Community/Area wide Plan designation: Implementation of the Draft 2045 CAP, once approved, would occur throughout unincorporated Los Angeles County in all Community Plan and Area Plan designations.

Zoning: Implementation of the Draft 2045 CAP, once approved, would occur throughout unincorporated Los Angeles County in all zoning designations.

Description of project:

Background

The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan (General Plan) (Los Angeles County 2015). The 2020 CCAP projected greenhouse gas (GHG) emissions from community activities in the unincorporated areas of Los Angeles County (County) to the year 2020 and identified actions to reduce those emissions below the level prescribed by AB 32, the Global Warming Solutions Act of 2006 (Los Angeles County 2015). Since then, various actions have been implemented and expanded to include other related efforts to reduce GHG emissions.

Generally, statewide targets are to reduce emissions to 40 percent below 1990 levels by 2030 (SB 32) and achieve carbon neutrality by 2045 (EO B-55-18). While not required to do so by law, the Draft 2045 CAP will allow the County to demonstrate how local actions can support these goals and ensure that the County contributes to the reduction of GHG emissions in alignment with the goals of the state and the OurCounty

Sustainability Plan (Los Angeles County 2019), including a 25 percent reduction in GHG emissions below 2015 levels by 2025, a 50 percent reduction below 2015 levels by 2035, and carbon neutrality by 2045.

The 2020 CCAP projected GHG emissions based on the General Plan growth to the year 2020 and identified actions which would reduce those emissions below the identified state targets at the time. The Draft 2045 CAP will provide a similar approach to the reduction of GHG emissions from community activities, including future development projected to 2030, 2035 under the General Plan, and 2045. Similar to the 2020 CCAP, the Draft 2045 CAP will be modeled with the land use assumptions, policies and implementation programs found within the General Plan (including the current Housing Element (6th Cycle), as well as within other County projects and programs.

In early 2020, the Department of Regional Planning (DRP) released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns, such as locating new housing developments away from existing sources of air pollution, and ensuring revenues from the state's Cap and Trade program benefit the County's disadvantaged communities; and a new development review consistency checklist to allow projects to streamline CEQA compliance for their projects by using the CAP, per CEQA Guidelines § 15183.5.

Contents of the Draft 2045 CAP

The Draft 2045 CAP will contain an executive summary and four chapters. Appendices A through C will provide additional detail on topics covered within the Draft 2045 CAP. A brief summary of each component follows:

- **Executive Summary:** The executive summary will include a synopsis of the Draft 2045 CAP, including its goals, GHG inventories and business-as-usual (BAU) forecasts, new 2030/2035/2045 targets, revised GHG reduction actions and their impact, and implementation steps.
- **Chapter 1 – Introduction and Need:** This chapter will provide a summary of the latest climate change science and regulations, and discussion of policies implemented since the 2020 CCAP was adopted. Chapter 1 also will provide an overview of the climate hazards and risks expected in Los Angeles County under high and low emissions scenarios. A discussion on resilience and equity will also be included.
- **Chapter 2 – Emissions Inventory, BAU Forecasts, and GHG Reduction Targets:** This chapter will present the results of the 2010, 2015, and 2018 GHG inventories and the BAU forecasts for 2025, 2035, and 2045. It will also summarize the 1990 GHG emissions backcast as it relates to the CAP's emission reduction targets. It will include a discussion of each emission sector and its major sources of GHG emissions, and a concise trends analysis to compare the 2010 and 2015 inventories with the current 2018 inventory and identify the primary sources of change in emissions (i.e., economic growth or contraction, technology and regulatory changes, climatic conditions, differences in methods and datasets, and new emission factors). This chapter will also discuss the County's 2030, 2035, and 2045 targets.
- **Chapter 3 – GHG Emission Reduction Strategy:** This chapter will describe the series of GHG reduction actions (GRAs) needed for the County to achieve its reductions targets, and the timeline for implementation. Estimated GHG emission reductions for all state, regional, and local GRAs (and supporting actions) for each future target/forecast year will be provided. A high-level cost-benefit

analysis will be provided for each GRA, including co-benefits to public health, equity, community resilience, climate adaptation, and the economy. Details of quantification methods and assumptions will be provided in a technical appendix. The Draft 2045 CAP includes 11 overarching strategies and 26 measures, each of which has multiple implementing actions (GRAs). The differences among strategies, measures, and GRAs are as follows:

- Strategies aim for overarching goals within each emissions sector.
 - Measures are focused, sub-sector specific programs and goals to achieve each strategy; most measures include performance standards, which are designed to be quantified for GHG emission reductions. Measures will be achieved through individual implementing GRAs.
 - GRAs are the specific policies, programs, or tools that will be implemented for each measure. GRAs are intended to be implemented in a coordinated manner to make meaningful progress toward achieving the associated measure.
- **Chapter 4 – Implementation and Monitoring:** This chapter will include the Draft 2045 CAP implementation and monitoring program, outlining for each GRA the specific actions to be taken, the needs for operational and capital resources, policy and regulatory changes, and the department and/or other entities responsible for implementation. The implementation plan will include performance indicators for each GRA that will be used to track progress toward achieving each future target, which can be done on an annual basis. This chapter will also summarize CEQA provisions and any development project review requirements for CEQA streamlining.
 - **Appendix A – GHG Inventory Report:** This appendix will include a more detailed presentation of the County’s 2010, 2015, and 2018 GHG inventories, including a description of the protocols and quantification methods used to prepare them.
 - **Appendix B – GHG Reduction Action Quantification Methods:** This appendix will describe the methods used to quantify GHG reductions for all GRAs.
 - **Appendix C – CAP Consistently Checklist:** This appendix will include the consistency checklist for new development.

List of GHG Reduction Strategies and Measures

The Draft 2045 CAP is anticipated to include approximately 26 recommended GHG reduction measures. Each includes multiple implementing actions. The recommended GHG reduction measures are to be organized under the five main categories and 11 strategies listed below.

Climate Leadership

- Strategy 1: Lead by example towards carbon neutrality
 - Measure CL1: Develop a Sunset Strategy for all Oil and Gas operations
 - Measure CL2: Establish GHG Requirements for New Development

Transportation

- Strategy 2: Increase densities and diversity of destinations with an emphasis near transit
 - Measure T1: Increase Density Near High-Quality Transit Areas
 - Measure T2: Develop Land Use Plans Addressing Jobs/Housing Balance & Increase Mixed Use
- Strategy 3: Reduce single-occupancy vehicle trips

- Measure T3: Expand Bicycle & Pedestrian Network to Serve Residential, Employment, & Recreational Trips
- Measure T4: Encourage Transit, Active Transportation, & Alternative Modes of Transportation
- Measure T5: Parking Limitations & Removal of Parking Minimums
- Strategy 4: Institutionalize low-carbon transportation
 - Measure T6: Increase ZEV Market Share and Reduce Gasoline and Diesel Fuel Sales
 - Measure T7: Electrify County Fleet Vehicles
 - Measure T8: Accelerate Freight Decarbonization
 - Measure T9: Expand Use of Zero-Emission Technologies for Off-Road Vehicles & Equipment

Building Energy & Water

- Strategy 5: Decarbonize buildings and energy use
 - Measure E1: Procure Zero-Carbon Electricity
 - Measure E2: Transition Existing Buildings to All-Electric
 - Measure E3: Standardize All-Electric New Development
 - Measure E4: Other Decarbonization Actions
- Strategy 6: Increase generation and resilience of renewable energy
 - Measure E5: Increase Renewable Energy Production
 - Measure E6: Increase Energy Resilience
- Strategy 7: Improve efficiency of building energy use
 - Measure E7: Improve Energy Efficiency of Existing Buildings
- Strategy 8: Promote water conservation
 - Measure E8: Increase Use of Recycled Water and Gray Water Systems
 - Measure E9: Reduce Indoor and Outdoor Water Consumption

Waste

- Strategy 9: Reduce and divert waste
 - Measure W1: Increase Organic Waste Diversion
 - Measure W2: Maximize Countywide Diversion Rate
 - Measure W3: Institutionalize Sustainable Waste Systems & Practices

Agriculture, Forestry, and Other Land Use

- Strategy 10: Conserve Forests and Working Lands
 - Measure A1: Conserve Agricultural and Forest Lands

- Strategy 11: Promote Carbon Sequestration and Sustainable Agriculture
 - Measure A2: Implement Regenerative Agricultural Practices
 - Measure A3: Expand the County’s Tree Canopy & Green Spaces

References

County of Los Angeles, 2015. Unincorporated Los Angeles County Community Climate Action Plan 2020 (2020 CCAP). August 2015. URL: https://planning.lacounty.gov/assets/upl/project/ccap_final-august2015.pdf.

County of Los Angeles, 2019. Los Angeles Countywide Sustainability Plan (OurCounty). Adopted August 9, 2019.

Surrounding land uses and setting: Los Angeles County is geographically one of the largest counties in the country. The County stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange County and San Bernardino County, to the north by Kern County, and to the west by Ventura County. Los Angeles County includes two offshore islands, Santa Catalina Island and San Clemente Island.

The project area includes only the unincorporated areas of Los Angeles County (unincorporated areas), which are comprised of approximately 2,650 square miles (approximately 65 percent of the total land area of Los Angeles County) as identified in Figure 1, Map of Unincorporated Los Angeles County.¹ Los Angeles County is geographically diverse. The unincorporated areas in the northern portion of the County are covered by large amounts of sparsely populated land, and include the Angeles National Forest, and parts of the Los Padres National Forest and the Mojave Desert. In the western portion of Los Angeles County, the unincorporated areas include Marina del Rey and the Santa Monica Mountains. The unincorporated areas in the southern portion of Los Angeles County consist of many non-contiguous land areas, which are often referred to as the County’s “unincorporated urban islands” including Hacienda Heights, Rowland Heights, and unincorporated areas in the San Gabriel Valley.

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code § 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The Los Angeles County CAP update began in the summer of 2019. The analysis of potential emission reductions began at the end of 2019 along with the initial drafting of an Initial Study. During this time, the tribal consultation process required by Assembly Bill 52 (AB 52) (Public Resource Code § 21080.3.1 et seq.) began.

On November 13, 2019, five California Native American Tribes were notified via U.S. Mail of the CAP update in compliance with AB 52. None of the tribes notified subsequently responded in writing or otherwise requested AB 52 consultation. Receiving no responses, the AB 52 tribal consultation process was completed and concluded in December of 2019.

¹ The Los Angeles County, 2015. Los Angeles County General Plan. Available online: <https://planning.lacounty.gov/generalplan>. Adopted October 6, 2015.

Other public agencies whose approval may be required (e.g., permits, financing approval, or participation agreement):

Los Angeles County has approval authority over the Draft 2045 CAP. Approval from other public agencies is not required. The County would certify the Final Environmental Impact Report (EIR), approve the General Plan Amendment, and adopt the Draft 2045 CAP.

Reviewing Agencies:

Responsible Agencies

- None
- Regional Water Quality Control Board:
 - Los Angeles Region
 - / Lahontan Region
- Coastal Commission
- Army Corps of Engineers
- LAFCO

Special Reviewing Agencies

- None
- Santa Monica Mountains Conservancy
- National Parks
- National Forest
- Edwards Air Force Base
- Resource Conservation District of Santa Monica Mountains Area
-

Regional Significance

- None
- SCAG Criteria
- Air Quality
- Water Resources
- Santa Monica Mtns. Area
-

Trustee Agencies

- None
- State Dept. of Fish and Wildlife
- State Dept. of Parks and Recreation
- State Lands Commission
- University of California (Natural Land and Water Reserves System)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially significant impacts affected by this project.

- | | | |
|--|--|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Agriculture/Forestry | <input type="checkbox"/> Hazards/Hazardous Materials | <input type="checkbox"/> Recreation |
| <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Transportation |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Land Use/Planning | <input checked="" type="checkbox"/> Tribal Cultural Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Utilities/Services |
| <input type="checkbox"/> Energy | <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Wildfire |
| <input type="checkbox"/> Geology/Soils | <input type="checkbox"/> Population/Housing | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

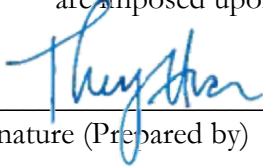
DETERMINATION: (To be completed by the Lead Department.)

On the basis of this initial evaluation:

- I find that the proposed project **COULD NOT** have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project **MAY** have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature (Prepared by)

December 22, 2021

Date



Signature (Approved by)

December 22, 2021

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources the Lead Department cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the Lead Department has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level. (Mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced.)
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA processes, an effect has been adequately analyzed in an earlier EIR or negative declaration. (State CEQA Guidelines § 15063(c)(3)(D).) In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of, and adequately analyzed in, an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 7) The explanation of each issue should identify: the significance threshold, if any, used to evaluate each question, and; mitigation measures identified, if any, to reduce the impact to less than significant. Sources of thresholds include the County General Plan, other County planning documents, and County ordinances. Some thresholds are unique to geographical locations.

1. AESTHETICS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

Los Angeles County is a large region with a diverse visual setting that includes both built and natural environments. Natural environments in the region include the coastline, beaches, foothills, mountains, ridgelines, and deserts. The urban and built environments within the County include industrial, commercial, residential, office, institutional, and public land uses (LA County 2015). Topography in the region such as the San Gabriel Mountains, Verdugo Hills, Santa Susana Mountains, Simi Hills, Santa Monica Mountains, and Puente Hills shape the topography within the region and create distinct communities with varying aesthetic character. These landforms, along with the coastline, define the scenic character of the region. The General Plan does not identify specific scenic vistas for the purpose of conservation purposes but does identify scenic highways and corridors, hillsides, viewsheds, and ridgelines as important scenic resources (LA County 2015). While there are no designated scenic vistas in the County, the combination of the wide LA Basin, foothills, and mountains allows for long range views of the LA Basin, the coastline, desert, and mountains from a variety of informal viewing locations.

The Draft 2045 CAP would be a policy document that does not include specific projects that could have a direct, adverse effect on scenic vistas. However, projects implementing Draft 2045 CAP measures could alter views of scenic vistas. Impacts could include short-term, temporary visual impacts from construction or long-term impacts if implementing projects were to introduce new forms or buildings with height, forms, or colors that could create contrast with existing conditions. Many of the projects that would implement the Draft 2045 CAP measures would involve retrofitting existing buildings, development along existing transit areas, or infill projects in urban locations that are already developed. These types of projects are not expected to significantly impact views from scenic vistas as they would be located in developed areas, would be likely to blend in with surrounding development, and would not be likely to create changes in visual quality that would be visible from a scenic vista or that would significantly interrupt views available from scenic vistas. Other potential projects promoted by Draft 2045 CAP Strategies could include composting facilities, renewable energy generation facilities, or water recycling facilities which could be located in more rural areas of the County and, depending on the design and location, create a greater level of visual contrast compared with existing conditions.

The Draft 2045 CAP would promote the development of rooftop solar and could incentivize the development of small-scale or utility-scale solar projects. Rooftop photovoltaic panels generally do not significantly alter rooflines or create large features that could be visible from the street level. From elevated viewing locations, rooftop solar panels may be visible. The form of solar panels is likely to blend in with existing rooflines and development. Therefore, the form and line created by rooftop solar panels is not likely to contrast with existing visual conditions to an extent that it would degrade views from scenic vistas. Depending on the angle of the sun, reflection off of solar panels may be visible from elevated locations at certain times of the day. However, solar panels are generally considered less reflective than water, glass, or metals used in residential and commercial construction (Shields 2010). Therefore, the reflection from rooftop solar panels is not likely to create a significant amount of contrast from scenic vistas compared to the reflection from existing development. Both small-scale

and utility-scale solar energy generation projects would be required to comply with the Renewable Energy Ordinance (REO), which regulates ground-mounted solar projects to address community concerns and minimize environmental impacts. The REO requires that any ground-mounted solar project obtain a Minor Conditional Use Permit or Conditional Use Permit. Both permits require that ground-mounted solar be analyzed for negative visual impacts and the potential for the facility to impact the viewshed (LA County Office of the County Counsel, 2016). Compliance with the REO and the enforcement of conditions listed as part of the REO would ensure that the potential for small-scale and utility-scale solar energy generation projects to impact visual resources would be minimized.

Any proposed development would be required to comply with the sections of the County Code, which regulate the appearance and siting of physical developments such as the Hillside Management Areas Ordinance and other portions of the code which regulate modification of scenic resources and the visual quality of new development. Projects requiring a Conditional Use Permit would have to meet development standards of the County Code. Additionally, components of the County Code that relate to the protection of Hillside Management Areas would ensure that the scenic character of ridgelines and hillsides would be preserved. As most of the scenic vistas in LA County are available from hillsides and ridgelines, compliance with the Hillside Management Areas Ordinance would ensure that visual impacts from scenic vistas would be reduced. Projects promoted by the Draft 2045 CAP also would be required to comply with the following policies of the General Plan which are intended to protect visual quality and prevent degradation of scenic vistas:

- Policy C/NR 13.1:** Protect scenic resources through land use regulations that mitigate development impacts.
- Policy C/NR 13.2:** Protect ridgelines from incompatible development that diminishes their scenic value.
- Policy C/NR 13.4:** Encourage developments to be designed to create a consistent visual relationship with the natural terrain and vegetation.
- Policy C/NR 13.6:** Prohibit outdoor advertising and billboards along scenic routes, corridors, waterways, and other scenic areas.
- Policy C/NR 13.8:** Manage development in HMAs to protect their natural and scenic character and minimize risks from natural hazards, such as fire, flood, erosion, and landslides.
- Policy LU 10.2:** Design development adjacent to natural features in a sensitive manner to complement the natural environment.
- Policy LU 10.3** Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.
- Policy LU 10.5:** Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction
- Policy LU 10.10:** Promote architecturally distinctive buildings and focal points at prominent locations, such as major commercial intersections and near transit stations or open spaces.
Therefore, projects implementing the Draft 2045 CAP measures would be

evaluated for project-level compliance with existing requirements and environmental regulations.

Furthermore, the Draft 2045 CAP includes Measure A1 that encourages the preservation of agricultural and forest lands and Measure A3 that promotes the expansion of the County's tree canopy and green spaces. These policies would preserve existing open spaces which contribute to the visual quality of scenic vistas and would result in a beneficial impact. Additionally, Measure T3 encourages the expansion of bicycle and pedestrian networks which could result in expanding the number and accessibility of publicly accessible scenic vistas, resulting in a beneficial impact.

The compliance of future projects with the General Plan and County Code would reduce the potential impact of future projects on scenic vistas. Additionally, subsequent projects requiring discretionary approval would undergo project-level CEQA review. The potential for any project to cause or contribute to the degradation of scenic vistas would be evaluated through that analysis and mitigation, if necessary, to reduce any significant impacts would be incorporated. As a result of requisite consistency with the General Plan and compliance with local ordinances, potential impacts of the Draft 2045 CAP on scenic vistas are considered less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

b) Be visible from or obstruct views from a regional riding, hiking, or multi-use trail?

A wide variety of trail types are found throughout the County, including multiuse trails that are accessible to pedestrians, equestrians, and mountain bikers. The highest concentration of trails in the County existing within the Santa Monica Mountains, near the foothills of the San Gabriel Mountains, and in the eastern areas of the county near Lancaster and Palmdale (LA County 2015).

As described above, the Draft 2045 CAP could promote projects that result in visual changes that are visible from regional trails or scenic vistas. Some of the Draft 2045 CAP strategies such as Strategy 4, Strategy 5, and Strategy 8 would include measures that would require retrofits to existing buildings in order to increase energy efficiency, and reduce water consumption. Measure E2 would encourage the transition of existing buildings to all-electric and RNG and Measure E7 would encourage improving the energy efficiency of existing buildings. These types of building retrofits would not be expected to result in changes to the mass, height, or color of buildings or other changes that could create visual change visible from regional trails. While these types of projects would not result in significant visual impacts, some projects could result in more noticeable visual contrast and changes, especially if projects are located in more rural areas of the County such as solar projects proposed in the Antelope Valley. As evaluated under criterion a), future projects would be required to comply with General Plan policies (identified above) and the County Code, which includes components to protect visual quality and resources such as the Hillside Management Areas Ordinance which protects views accessible from hills and ridgelines. Additionally, as described under criterion a), solar energy generation projects would be required to comply with the REO, which includes conditions to reduce the visual impacts of solar projects and would require that a site-specific analysis of the potential for visual impacts be conducted. Furthermore, future projects would be required to undergo project-specific environmental review which would evaluate the potential for a project to affect views from regional trails and mitigate any significant impacts. For these reasons, impacts of the Draft 2045 CAP on views from regional trails would be less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

c) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

There are three adopted scenic highways within the Project Area: Angeles Crest Highway Route-2, from 2.7 miles north of I-210 to the San Bernardino County line; Mulholland Highway (two sections), from SR-1 to Kanan Dume Road, and from west of Cornell Road to east of Las Virgenes Road; and Malibu Canyon–Las Virgenes Highway, from SR-1 to Lost Hills Road. There are also eight highways within unincorporated LA County that are eligible for designation (LA County 2015; Caltrans 2021).

As disclosed above, the Draft 2045 CAP could promote projects that would result in visual contrast or changes during the construction of projects or by creating new structures that would create contrast compared to existing visual conditions. These projects could occur near designated scenic highways and could, depending on the location and design of the projects, result in changes to the visual resources visible along a scenic highway such as trees, rock outcroppings or historic buildings. Most projects that would be encouraged by the Draft 2045 CAP would involve modifications to existing buildings or would be located in areas that are already developed and are not as likely to be located near scenic resources such as rock outcroppings or trees. These projects would not be likely to damage scenic resources. Projects that would involve new development have a greater potential to impact scenic resources visible from a scenic highway. However, such projects are likely to be spread out within the County and located in areas that are already urbanized and developed and not located near scenic resources such as rock outcropping or trees. These projects are not likely to be located near significant scenic resources that could be altered by projects implementing the Draft 2045 CAP. Therefore, projects developed to implement the measures of the Draft 2045 CAP are not likely to substantially degrade scenic resources visible from a scenic highway.

Additionally, any future development proposed to implement the measures of the Draft 2045 CAP would be required to comply with policies in the General Plan (identified above), which are intended to protect scenic resources, protect ridgelines and hillsides, prohibit advertising along scenic routes, protect historical resources, and support the preservation of historic buildings. Future projects also would be required to comply with elements of the County Code, including elements to protect visual quality and resources such as the Hillside Management Areas Ordinance (which protects views accessible from hills and ridgelines) and the Mills Act Program (which is designed to protect historical properties). Future projects encouraged by the Draft 2045 CAP would be subject to project-level CEQA review which would evaluate the potential for the project to impact scenic resources visible from a scenic highway and apply mitigation to address significant impacts if necessary. As a result, the Draft 2045 CAP’s impacts on scenic resources visible from a designated scenic highway are considered less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

d) Substantially degrade the existing visual character or quality of public views of the site and its surroundings because of height, bulk, pattern, scale, character, or other features and/or conflict with applicable zoning and other regulations governing scenic quality? (Public views are those that are experienced from a publicly accessible vantage point)

The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly result in new or expanded development. The

Draft 2045 CAP includes measures that would promote the retrofitting of buildings to include water and energy efficiency upgrades. These types of retrofits and modifications to existing buildings are not expected to create significant changes in visual character that would be visible from publicly accessible locations. The Draft 2045 CAP also includes measures that would incentivize mixed use developments, infill developments along transit-oriented areas, and could encourage the development of projects to reach the water recycling, waste management, and energy goals identified in the Draft 2045 CAP. These projects could include compost processing facilities, renewable energy generation facilities, or water recycling facilities. These projects are likely to be located in developed areas. However, some projects such as solar energy generation projects or composting facilities, could be located in rural areas of the County where the visual contrast created by implementing projects would be greater.

Each of these projects would be required to comply with the County Code, which includes provisions to regulate height limits, setbacks, bulk etc. and apply development standards appropriate to each zone. The County Code also includes specific ordinances to protect the visual quality of hillsides management areas and ridgelines. Future projects would also be required to be consistent with policies of the General Plan intended to protect overall visual quality and scenic resources. Overall, most projects resulting from implementation of the Draft 2045 CAP are expected to be located in areas that feature existing urban development. The introduction of higher density development, mixed uses, incorporation of rooftop solar, adjustment of landscaping to drought tolerant plants etc. are expected to result in small adjustments to community character and visual appearance. Retrofits to existing buildings to incorporate water and energy efficiency measures would likely involve changes to the interior of building structures and would not be visible from publicly accessible viewpoints. The potential for utility-scale or other sized solar energy generation projects to be proposed in more rural areas such as the Antelope Valley would continue to be analyzed on a project-specific basis for purposes of CEQA.

Other future development projects implementing the Draft 2045 CAP measures also would be evaluated on an individual basis once details are known. Individual future development projects supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review and disclose any potential impacts related to aesthetics and provide mitigation of any significant impacts, if necessary. The Draft 2045 CAP does not include specific proposed development, and it would be speculative to guess where any specific future development might be proposed in furtherance of Draft 2045 CAP goals. For the reasons discussed here and in the preceding two paragraphs, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

e) Create a new source of substantial shadows, light, or glare which would adversely affect day or nighttime views in the area?

Shade and shadow could be created if buildings or structures block direct sunlight from adjacent properties potentially affecting the users or occupants of adjacent land uses. Shade and shadow can be influenced by the time of day, season, weather, height and bulk of building, spacing, topography and other factors. Shade can result in positive effects such as cooling or can result in negative effects such as the loss of natural light.

The Draft 2045 CAP could result in the development of projects such as mixed use or infill developments, building retrofits, the development of facilities such as composting facilities, water recycling facilities and solar energy generation facilities. Depending on the location and design of these projects, they have the potential to create shade, shadows, daytime glare, and nighttime lighting. Nighttime lighting would mostly be limited to lighting from infill and mixed-use projects. These projects could be located in more urbanized areas developed with considerable existing sources of nighttime lighting. Therefore, nighttime lighting resulting from any such projects would not create a significant contrast compared to existing conditions. The Draft 2045 CAP would

encourage the installation of rooftop solar projects. Rooftop solar would generally be unnoticeable from the ground level; however, reflection created from solar panels could be seen from elevated locations. As described under criterion a), above, photovoltaic panels can result in reflection and glare depending on the time of the day, angle of the sun, etc. However, photovoltaic panels are designed to absorb as much light as possible rather than to reflect light. While the panels can result in some reflection or glare, the glare created by photovoltaic panels is generally considered to be less than that created by water or common building materials such as metal or glass (Shields 2010).

The Draft 2045 CAP could also indirectly incentivize the development of solar facilities in rural areas (such as the Antelope Valley), where they could be more visible from roads, trails and other at-grade elevations. Projects located in the Rural Outdoor Lighting District would be required to comply with development requirements and lighting restrictions intended to protect dark skies in rural areas of the County. Compliance with this component of the Zoning Ordinance would reduce the potential for projects located in rural areas to result in a significant lighting impact. Utility-scale solar projects would be required to comply with the REO (described in more detail under criterion a) and to obtain a Conditional Use Permit. The REO requires that utility-scale solar projects include a glare study that evaluates the potential for a solar project to result in glare. The glare study conducted as part of the Conditional Use Permit process would disclose the potential for a proposed utility-scale solar project incentivized by the Draft 2045 CAP to result in a significant impact relating to glare, and would inform County decision-makers' decision of whether to approve the Conditional Use Permit. Therefore, the potential for glare to result from any utility scale solar projects incentivized by the Draft 2045 CAP would be evaluated as part of the Conditional Use Permit process.

Each development encouraged by the Draft 2045 CAP would be subject to the goals and policies within the General Plan and development standards with the County Code related to reducing the impact of glare, light, and shadows on surrounding land uses. This would ensure that each development would be designed in a manner that would not create significant shadow impacts for surrounding land uses.

Development of potential future projects supported by Draft 2045 CAP measures would be evaluated on an individual basis once details are known. Individual proposals facilities supported by CAP measures would be required to undergo project-level CEQA review and disclose any potential impacts related to light, glare, and shadow and provide mitigation of any significant impacts, if necessary. The Draft 2045 CAP does not include any specific proposed facilities or facility locations and it would be speculative to guess where any specific future development might be proposed in furtherance of Draft 2045 CAP goals. For the reasons discussed here and in the preceding three paragraphs, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

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2. AGRICULTURE / FOREST

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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There is a relatively small quantity of land area located within Los Angeles County that contains designated farmland. Important farmland in the County is located in Antelope Valley, Santa Clarita Valley, the Santa Monica Mountains, and the San Fernando Valley. Approximately 90 percent of the important farmland in the County is located in Antelope Valley. Within unincorporated areas of the County, there are approximately 26,235 acres of prime farmland, farmland of statewide importance, and unique farmland. There are approximately 6,853 acres of farmland of local importance and 205,193 acres of grazing land (Los Angeles County 2014; DOC 2021). The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly convert designated farmland to non-agricultural use.

However, implementation of Draft 2045 CAP GHG reduction measures that involve ground disturbance could, depending on the location, result in the conversion of farmland to non-agricultural use. For most types of development projects that may be proposed in furtherance of Draft 2045 CAP goals, construction is anticipated to occur primarily within developed areas such as parking lots, improvements to existing structures, and urban areas near public transportation. However, other types of new projects encouraged by Draft 2045 CAP measures could occur in previously undeveloped areas such as facilities to increase waste diversion or renewable energy. Measure E1: Procure Zero-Carbon Electricity and Measure E5: Increase Renewable Energy Production could result in the development of photovoltaic solar or other renewable energy generation facilities in undeveloped areas, which development could result in the conversion of farmland to a non-agricultural use. However, when proposals for renewable energy generation facilities are submitted, the County directs would-be developers of such projects to areas that previously have been disturbed (e.g., sites where farming may no longer be viable due to factors such as access to water) and away from actively farmed sites. Further, consistency with General Plan policies included in the Conservation and Natural Resources Element have been adopted to protect agricultural lands would further reduce the likelihood that solar energy-related or other development would result in the conversion of farmland to a non-agricultural use. See, for example, General Plan Policies C/NR 8.1, 8.2 and 8.3 in furtherance of Goal C/NR 8, which protects productive farmland for local food production, open space, public health, and the local economy. (County of Los Angeles 2015) Therefore, conversion of a significant amount of CEQA-defined

Farmland is not likely due to the small amount of designated farmland in the unincorporated areas of the County, discouragement of proposals that could result in such conversion, and the fact that conversion of designated farmland would conflict with General Plan policies and a GHG reduction measure proposed as part of the Draft 2045 CAP (described below). Impacts are considered to be less than significant.

Development of potential future projects supported by Draft 2045 CAP measures would be evaluated on an individual basis once details are known. Individual proposals for renewable energy generation facilities or other facilities supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review to disclose potential significant impacts, if any, related to the conversion of designated farmland and to mitigate any such significant impacts, if feasible. Therefore, this consideration will not be evaluated further in the EIR.

b) Conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract?

Title 22 (Zoning Code) Chapter 22.16 (Agricultural, Open Space, Resort and Recreation, and Watershed Zones) establishes the Light Agricultural Zone (A-1) and Heavy Agricultural Zone (A-2) which allow for a comprehensive range of agricultural uses in areas particularly suited for agricultural activities. As described within Section 22.16.100 (Purpose), permitted uses are intended to encourage agricultural activities and other such uses required for, or desired by, the inhabitants of the community. An area so zoned may provide the land necessary to permit low-density single-family residential development, outdoor recreational uses, and public and institutional facilities. For example, some older suburban communities particularly in the East San Gabriel Valley maintain agricultural zoning. Existing communities like these could potentially be located in proximity to high quality transit areas (HQTAs) and, as such, may experience rezoning as a part of community plan updates to implement the Housing Element. Nonetheless, any such rezoning would result from Housing Element implementation, not from implementation of the Draft 2045 CAP.

The Zoning Code implements the General Plan policies via detailed development regulations. The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions. The Draft 2045 CAP would not propose changes to the General Plan Land Use Designations that could in turn require changes to zoning nor does it include specific projects that could conflict with existing zoning. Further, the Draft 2045 CAP includes Measure A1: Conserve Agricultural and Working Lands, Forest Lands and Wildlands to help preserve existing agricultural lands. Conserving and restoring agricultural and forest lands keeps carbon in the ground and provides a multitude of benefits from maintaining biodiversity in Significant Ecological Areas (SEA) to preserving the character of the unincorporated County’s rural areas. Draft 2045 CAP Action A1.1 calls for the creation of agricultural easements to preserve agricultural lands, working lands, rangelands, and forestlands. Draft 2045 CAP Action A1.1 would create an agricultural easement program; create necessary ordinance to support the preservation of these lands; identify areas for easements; and develop plan for creating easements. Therefore, adoption of the Draft 2045 CAP would not directly or indirectly conflict with Agricultural Zoning as a result of future energy, housing, or other projects proposed in furtherance of the Draft 2045 CAP.

The Williamson Act, also known as the California Land Conservation Act of 1965, enables local governments to enter into contracts with private landowners in order to restrict specific parcels of land to agricultural or related open space use. The only Williamson Act contracts in effect in Los Angeles County are for land on Santa Catalina Island (LA County 2015). The Draft 2045 CAP includes Measure A1 to help conserve agricultural lands which would be consistent with the purpose of the Williamson Act to restrict specific parcels of land to agricultural or related open space use. Therefore, no direct impacts related to conflicts with Williamson Act contracts would result with adoption of the Draft 2045 CAP. Indirect impacts resulting from

solar energy generation, housing, or other projects that could be proposed in the future in furtherance of the Draft 2045 CAP also would not be expected to result in conflicts with Williamson Act contracts because of the small amount of land in the unincorporated areas of the County that are or could be subject to a Williamson Act contract, the County’s discouragement of proposals that could result in impacts to productive agricultural lands, and the fact that such conflicts would not be consistent with General Plan policies promoting Goal C/NR 8, which protects productive farmland for local food production, open space, public health, and the local economy.

For the reasons discussed above, potential impacts relating to conflict with existing zoning for agricultural use, with a designated Agricultural Resource Area, or with a Williamson Act contract would be less than significant. Therefore, this consideration will not be evaluated further in the EIR.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code § 12220 (g)), timberland (as defined in Public Resources Code § 4526), or timberland zoned Timberland Production (as defined in Government Code § 51104(g))?

Forest land is defined as “land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits” (Public Resources Code § 12220[g]). Timberland is defined as “land...which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees” (Public Resources Code § 4526).

The Angeles National Forest and the Los Padres National Forest encompass approximately 650,000 acres of land within unincorporated Los Angeles County. These forests occupy a large portion of Los Angeles County and support oak woodlands, black walnut, grey pine, and other native tree species (Los Angeles County 2014; California Wilderness Coalition 2020; DOC 2021). For example, 11 of California’s 20 species of native oaks are found in the Los Padres National Forest, including blue oak, valley oak, and California black oak; California shrub oak species, including leather oak and Nuttall’s (“coastal”) scrub oak also are found in the Los Padres National Forest (Los Padres ForestWatch, Inc. 2013).

The Draft 2045 CAP would not propose changes to the General Plan Land Use Designations and includes Measure A1 to conserve forestlands. Further, as a general matter, forest land would not be suitable for the implementation of actions in furtherance of the Draft 2045 CAP. For example, solar energy generation requires access to sun; forested areas do not provide that resource and would not be deforested to serve a solar energy generation use (which itself would be counter to another Draft 2045 CAP implementing action). Additionally, private in-holdings within the forests have a large number of owners, with each not necessarily owning large contiguous parcels that would be conducive to development of solar energy generation. The County has no existing zoning specific to forest use or timberland, and does not have land use authority to approve development proposed in national forests like the Angeles National Forest and the Los Padres National Forest. Instead, the U.S. Forest Service, which provides land use oversight in those locations, may authorize uses in national forests that benefit the general public and protect public and natural resources values. The construction of new private residences in national forest lands is prohibited by Forest Reserve Act of 1891, and Forest Service land usually is not made available if the overall needs of an individual project proponent or business can be met on nonfederal lands (U.S. Forest Service 2013). The County is not aware of any applications for the development of a solar energy generation project on Angeles National Forest or

Los Padres National Forest lands and whether or not the U.S. Forest Service would allow such development in the future is speculative. Therefore, the Draft 2045 CAP would not cause a significant impact relating to conflicts with existing zoning of timberland or forest land.

Individual proposals for renewable energy generation facilities or other facilities supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review, and to disclose and mitigate any potential significant impacts related to the conversion of forest or timberland. This includes project compliance with Draft 2045 CAP Measure A1 (if approved) to conserve forest lands. Therefore, for the reasons discussed in the preceding two paragraphs, this consideration will not be evaluated further in the EIR.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

The Draft 2045 CAP does not propose changes to the General Plan Land Use Designations and includes Measure A1 to conserve forestlands. As described above under criterion c) forest land located in unincorporated areas of the County (i.e., in the Angeles National Forest and Los Padres National Forest) would not directly be affected by adoption of the Draft 2045 CAP and would not likely be developed in the future with projects proposed in furtherance of Draft 2045 CAP goals. Additionally, the GHG reduction measures proposed as part of the Draft 2045 CAP that could result in construction impacts would be focused primarily in urbanized areas of the unincorporated County and so would be unlikely to impact forest land. The Antelope Valley is not urbanized, and solar energy generation facilities are common there. Consistent with past practice, additional solar energy generation projects could be proposed in the Antelope Valley. However, because resources meeting the definition of forest land (Public Resources Code § 12220[g]) are not located there, potential future solar energy generation projects that may be proposed in the Antelope Valley in furtherance of Draft 2045 CAP goals would not cause a significant impact in this regard. Additionally, as described above, Draft 2045 CAP Measure A1 is intended to conserve agricultural and working lands, forest lands and wildlands. Therefore, impacts would be less than significant.

Individual proposals for projects supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review, and to disclose and mitigate any potential significant impacts related to the conversion of forest land. This includes project compliance with Draft 2045 CAP measure A1 to conserve forest lands. Therefore, for the reasons discussed in the preceding paragraph, this consideration will not be evaluated further in the EIR.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use designations with the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly convert designated farmland to non-agricultural use or convert forest land to non-forest use. In general, construction associated with Draft 2045 CAP measures is anticipated to occur primarily within existing developed areas. As discussed in the context of criterion d), potential future solar energy generation projects could be proposed in the Antelope Valley, but would not cause a potential significant impact associated with the conversion of forest land. The Draft 2045 CAP proposes measures that support the efficient use of urban land, transit-oriented projects, renewable energy use, and facilities to increase waste diversion among others. The Draft 2045 CAP also includes Measure A1 to conserve agricultural and working lands, forest lands and wildlands. Therefore, potential impacts related to the conversion of designated farmland or forest land would be less than significant.

Individual proposals for projects supported by Draft 2045 CAP measures would be required to undergo project-level CEQA review, and to disclose and mitigate any potential significant impacts related to the conversion of farmlands and/or forestland. The Draft 2045 CAP does not include any specific proposed facilities or facility locations and it would be speculative to guess where any such developments would be proposed or located. Therefore, for these reasons and those summarized in preceding paragraphs, this consideration will not be evaluated further in the EIR.

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3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Conflict with or obstruct implementation of applicable air quality plans of either the Antelope Valley AQMD (AVAQMD) or the South Coast AQMD (SCAQMD)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The AVAQMD and SCAQMD, together with the Southern California Association of Governments (SCAG), are responsible for formulating and implementing air pollution control strategies throughout the County. The AVAQMD is responsible for regulating stationary sources of air pollution in the northern desert portion of the County, while the SCAQMD is responsible for regulating stationary sources of air pollution in the non-desert portion of the County. The AVAQMD 2017 Federal 75 ppb Ozone Attainment Plan includes planning assumptions regarding population, vehicle activity and industrial activity that addresses ozone precursor-producing activities within the AVAQMD to demonstrate attainment of the 75 parts per billion Federal 8-hour ozone standard by July 2027. The SCAQMD 2016 Air Quality Management Plan (AQMP) contains measures to meet the Federal 24-hour standards for particulate matter less than 2.5 microns in diameter (PM 2.5) by 2019, annual PM2.5 standards by 2025, and 1-hour ozone (O3) standards by 2022.

The Draft 2045 CAP would be a policy document, the approval of which would not directly result in the construction or operation of new land uses that may be developed within the County and would not result in direct conflicts with the AQMP. However, indirect impacts associated with implementation of proposed Strategies, Measures, and Actions could result. Indirect pollutant emissions resulting from the construction and operation of future development within the County under the Draft 2045 CAP would also have the potential to affect implementation of the AQMP. Therefore, this topic will be analyzed further in the EIR.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Los Angeles County is characterized by relatively poor air quality. State and Federal air quality standards often are exceeded in portions of the County. The County currently is designated as non-attainment of Federal and/or State air quality standards for O₃, particulate matter less than 10 microns in diameter (PM 10), and for PM 2.5. The Draft 2045 CAP would result in increased indirect air emissions associated with implementation of proposed Strategies, Measures, and Actions. As such, implementation of the Draft 2045 CAP could have the potential to contribute to cumulatively significant air quality impacts in combination with other existing and future emission sources in the Project area. Indirect pollutant emissions resulting from the construction and operation of future development within the County under the Draft 2045 CAP also would have the potential to affect implementation of the AQMP. Therefore, this topic will be analyzed further in the EIR.

c) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive receptors include children, elderly people, people with asthma, and others who are at a heightened risk of negative health outcomes due to exposure to air pollution. The locations where these sensitive receptors congregate are considered sensitive receptor locations. Existing sensitive receptor locations in the County include, but are not limited to, residential communities, schools and school yards, day care centers, parks and playgrounds, hospitals and medical facilities. Implementation of the Draft 2045 CAP could increase air emissions above current levels, including potentially toxic air contaminants (TACs), thereby potentially affecting nearby sensitive receptors. Therefore, this topic will be analyzed further in the EIR.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Other emissions, such as those leading to odors, typically are associated with industrial developments involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes. Odors also are associated with such uses as sewage treatment facilities and landfills. The Draft 2045 CAP would be a policy document, the approval of which would not directly result in the generation of other emissions, such as those leading to odors. Indirect pollutant emissions, such as odorous emissions, could result from the construction and operation of future development within the County under the Draft 2045 CAP. Common sources of odors from development within a community may include the use of volatile organic compound (VOC)-containing architectural coatings and solvents, municipal solid waste collection areas, and transfer stations and material recovery facility operations. The AVAQMD and SCAQMD have adopted rules for controlling nuisance emissions, such as those leading to odors, from community sources. AVAQMD Rule 402 and SCAQMD Rule 402 both prohibit emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. The AVAQMD and SCAQMD both regulate the VOC content of architectural coatings and solvents via several adopted rules including Rules 442, 1107, 1113 and 1171, as numbered by both air districts. The SCAQMD, which has jurisdiction over an area with a substantially greater population density than the AVAQMD, has adopted additional source-specific rules that assist in controlling odors including Rule 410 for controlling odors from transfer stations and material recovery facilities and Rule 1138 for controlling emissions from restaurant cooking operations. While the AVAQMD has no rules identical to SCAQMD Rules 410 and 1138, potential odorous emissions would still be subject to the overall nuisance requirements in Rule 402. Future development within the County under the Draft 2045 CAP would be required to comply with all applicable regulatory requirements for controlling emissions such as those leading to odors. Furthermore, the Draft 2045 CAP would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and no changes to land use designations are proposed. Thus, the Draft 2045 CAP would not increase exposure of people to other emissions such as those leading to odors, and would not have the potential to generate odors that affect a substantial number of people. Impacts from adoption of the Draft 2045 CAP would be less than significant and this issue will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

4. BIOLOGICAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Species and habitats identified by CDFW as candidate, sensitive, or special status that may be present in unincorporated areas of the County include, for example, Swainson’s hawk (*Buteo swainsoni*). Species and habitats identified by USFWS that may be present include, for example, arroyo toad (*Anaxyrus californicus*). There is a potential for any of these species or their habitats to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county-wide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environments and on disturbed areas with existing infrastructure. These include a majority of the CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use (Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19). The implementation of Draft 2045 CAP measures would create a safer bikeway network (Measure T6), would promote shade for pedestrians to support alternative modes of transportation (Measures T15 and T17), support the preservation of restored forest lands (Measure A1), and increasing urban forests (Measure A2, Measure A3), which would reduce pressures on vacant and undeveloped land.

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes, electric vehicle (EV) chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction could result in impacts to candidate, sensitive, or special status species, or their habitats. Future individual projects to implement the measures proposed in the Draft 2045 CAP would undergo site-specific review and CEQA analysis to analyze and mitigate potential significant impacts to candidate, sensitive, or special status species and their habitats. Further, implementation of individual projects implementing Draft 2045 CAP measures would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding candidate, sensitive, or special status species. Impacts to candidate, sensitive, or special status species are considered to be potentially significant and will be further evaluated in the EIR.

b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS?

Sensitive natural communities present in unincorporated LA County include southern riparian forest and juniper woodland. There is a potential for any of these sensitive natural communities to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environments and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use (Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19).

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes, EV chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction could result in impacts to sensitive natural communities. Future individual projects to implement the measures proposed in the Draft 2045 CAP would undergo site specific review and CEQA review to analyze and mitigate potential significant impacts to sensitive natural communities. Further, the individual projects implementing Draft 2045 CAP measures also would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding sensitive natural communities. Impacts to sensitive natural communities are considered to be potentially significant and will be further evaluated in the EIR.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?

Protected wetlands are present in unincorporated areas of the County. For example, marshes may be found in San Fernando Valley, vernal pools may be found in Simi Valley, and coastal wetlands may be found in Topanga Lagoon and Arroyo Sequit. There is a potential for any of these species or corridors to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environment and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use

(Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19).

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes, EV chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction could result in impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. Future individual projects to implement the 2045 CAP Draft 2045 CAP would undergo site specific review and CEQA analysis to identify and mitigate potential significant impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. Further, implementation of individual projects implementing Draft 2045 CAP measures also would be subject to policies included in the General Plan, as well as other local, state, and federal regulations regarding wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites. For example, individual projects implementing Draft 2045 CAP measures would be subject to the Migratory Bird Treaty Act, which prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. Impacts to wildlife movement, migratory fish or wildlife species corridors, and native wildlife nursery sites are considered to be potentially significant and will be further evaluated in the EIR.

e) Convert oak woodlands (as defined by the state, oak woodlands are oak stands with greater than 10% canopy cover with oaks at least 5 inch in diameter measured at 4.5 feet above mean natural grade) or other unique native woodlands (juniper, Joshua, southern California black walnut, etc.)?

Oak woodlands may be found in unincorporated areas of the county including, but not limited to, the Santa Monica Mountains and areas around the Angeles National Forest. Other unique native woodlands (such as juniper and southern California black walnut) also may be found there. Joshua woodland can be found in northern Los Angeles County throughout the Antelope Valley. There is a potential for any of these unique native woodlands to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environment and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use (Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19). The Draft 2045 CAP measures would support the preservation of restored forest lands (Measure A1), and increase urban forests (Measure A2, Measure A3) which would protect existing oak woodland and other unique woodlands as well as increase canopy cover such as oak woodland within the County.

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes,

EV chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction could result in impacts to oak woodlands or other unique native woodlands. Future individual projects implementing Draft 2045 CAP measures also would be subject to policies included in the General Plan, as well as other state and federal laws and regulations regarding conversion of oak woodlands or other unique native woodlands, such as the state's Oak Woodlands Protection Act, which prohibits a person from removing from an oak woodland (as defined) or specified oak trees, unless an oak removal plan and oak removal permit application for the oak tree removal has been submitted to and approved by the Director of Fish and Wildlife. The County administers the Oak Woodlands Plan and other biological resource protection ordinances which similarly prohibits a person from removing or converting native woodlands unless a discretionary permit application has been submitted to and approved by the Director of Regional Planning. Potential impacts relating to the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174) are analyzed below. Impacts to oak woodlands or other unique native woodlands are considered to be potentially significant and will be further evaluated in the EIR.

f) Conflict with any local policies or ordinances protecting biological resources, including Wildflower Reserve Areas (L.A. County Code, Title 12, Ch. 12.36), the Los Angeles County Oak Tree Ordinance (L.A. County Code, Title 22, Ch. 22.174), the Significant Ecological Areas (SEAs) (L.A. County Code, Title 22, Ch. 102), Specific Plans (L.A. County Code, Title 22, Ch. 22.46), Community Standards Districts (L.A. County Code, Title 22, Ch. 22.300 et seq.), and/or Coastal Resource Areas (L.A. County General Plan, Figure 9.3)?

Wildflower Reserve Areas are found, but not limited to, the areas in northern Los Angeles County within the Antelope Valley. Significant Ecological Areas (SEA) can be found throughout Los Angeles County. Oaks are widely dispersed throughout the County. Coastal Resource Areas can only be found in three areas (Santa Catalina Island, Marina Del Rey, and Santa Monica Mountain Coastal Zone). There is a potential for Wildflower Reserve Areas, SEAs, oaks, or Coastal Resource Areas to be affected by the construction of one or more of the projects undertaken to implement the Draft 2045 CAP.

The Draft 2045 CAP would be a County-wide policy document intended to reduce GHG emissions. It would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. Individual projects implementing the Draft 2045 CAP measures are anticipated to be located primarily within the urban environment and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation options (Measure T1, Measure T4, Measure T6, Measure T9, Measure T10, Measure T14), institutionalizing low-carbon transportation (Measure T19, Measure T22, Measure T24), decarbonizing building energy use (Measure SE3, Measure SE6, Measure SE8), promoting water conservation (Measure SE9, Measure SE10, Measure SE 12, Measure SE13), and increasing renewable energy (Measure SE18, Measure SE19).

However, some of the Draft 2045 CAP measures (Measure T11, Measure T18, Measure SE11, Measure SE15, Measure SE16, Measure SE17, Measure W5) would promote implementation projects including transit routes, EV chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the location of the implementing projects, construction would be required to comply with local

policies or ordinances, such as the General Plan and the County’s Zoning Code, protecting biological resources, such as SEAs and oak trees. Note that the County’s Renewable Energy Ordinance prohibits ground-mounted utility-scale solar facilities in SEAs. Future individual projects to implement the measures proposed in the Draft 2045 CAP would undergo site specific review and CEQA analysis to identify and mitigate potential significant impacts relating to consistency with applicable policies and ordinances protecting biological resources, where avoidance is not attainable. Future individual projects implementing Draft 2045 CAP measures also would be subject to policies included in the General Plan, as well as other local, state, and federal regulations. Impacts to biological resources protected under local policies and ordinances are considered to be less than significant through the County’s discretionary approval for compliance with local ordinances, and this issue will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

g) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved state, regional, or local habitat conservation plan?

There are currently no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved state, regional, or local habitat conservation plans in effect in unincorporated Los Angeles County. Therefore, no impact would occur. This consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

5. CULTURAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines § 15064.5?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP is a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2021 Housing Element. As a policy document, the Draft 2045 CAP itself would not result in direct impacts to historical resources. However, future projects implementing GHG reduction measures contained in the Draft 2045 CAP could involve structural improvements and/or ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of historical resources. For example, such changes could result from construction of new solar s, electric vehicle (EV) charging infrastructure (Measure T6), photovoltaic systems (Measure E5), creating a more connected bikeway network (Measure T3), and also tree planting to expand the County’s Tree Canopy (Measure A3). Future projects would be required to comply with existing federal, State, and local regulations that protect historical resources and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects could nonetheless result in significant impacts to historic architectural resources and/or archaeological resources qualifying as historical resources. Impacts to historical resources are considered to be potentially significant and will be further evaluated in the EIR.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines § 15064.5?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions. the 2021-2029 Housing Element. As a policy document, the Draft 2045 CAP itself would not result in direct impacts to unique archaeological resources. However, future projects to implement some GHG reduction measures contained in the Draft 2045 CAP could involve ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of unique archaeological resources. Future projects would be required to comply with existing federal, State, and local regulations that protect historical resources and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA. Such projects could nonetheless result in significant impacts to unique archaeological resources. Impacts to unique archaeological resources are considered to be potentially significant and will be further evaluated in the EIR.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?



Paleontological resources are the fossilized remains of plants and animals, including vertebrates (animals with backbones; mammals, birds, fish, etc.), invertebrates (animals without backbones; starfish, clams, coral, etc.), and microscopic plants and animals (microfossils), and can include mineralized body parts, body impressions, or footprints and burrows. They are valuable, non-renewable, scientific resources used to document the existence of extinct life forms and to reconstruct the environments in which they lived. A significant impact would occur if a project would destroy a unique paleontological resource or site, or a unique geologic feature.

In its “Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources,” the Society of Vertebrate Paleontology (SVP) defines four categories of paleontological potential for rock units: high, low, undetermined, and no potential: **High Potential**, rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources; **Low Potential**, rock units that are poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule; **Undetermined Potential**, rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment; and **No Potential**, rock units like high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites) that will not preserve fossil resources (SVP, 2010). It is important to note that while paleontological potential as defined above can provide a rough idea of whether subsurface fossils may exist, the uniqueness or significance of a fossil locality is unknown until it is identified to a reasonably precise level (Scott and Springer, 2003). Therefore, any fossil discovery should be treated as potentially unique or significant until determined otherwise by a professional paleontologist.

As indicated by geologic mapping, the surficial geology within the planning area is varied, with a majority of the deposits composed of Holocene, Pleistocene, Pliocene, and Miocene-age sedimentary deposits. Additionally, there are occurrences of Cretaceous, Jurassic, and Triassic-age metamorphic and igneous rocks associated with the San Gabriel and Eastern Santa Monica mountains in the planning area. For areas that are mapped as having Holocene-age deposits at the surface, there may be older, Pleistocene-age deposits at unknown depths within the subsurface (Yerkes & Campbell, 2005).

Among the Pliocene and Miocene-age deposits in the planning area, geologic mapping indicates that deposits associated with the Los Angeles Basin (i.e., San Pedro, Inglewood, Puente, and Fernando formations, and the Topanga Group) are present at the surface, and assumingly, in the subsurface (Yerkes & Campbell, 2005).

Paleontological Sensitivity

Records that are available through the University of California Museum of Paleontology (UCMP) online fossil localities database indicate numerous fossil localities within Los Angeles County. Among the available records, there are 77 vertebrate, 1767 invertebrate, 108 plant, and 271 microfossil localities, several from the deposits that occur in the planning area (UCMP, 2021a).

In general, Holocene-age alluvial deposits are considered to have a low potential to contain significant paleontological resources, based on the recent age of the deposits (SVP, 2010); late Holocene-age deposits (i.e., younger than 5,000 radiocarbon years) have a particularly low potential. Deposits that date to the middle Holocene (i.e., older than 5,000 radiocarbon years) have a potential that increases as the depth into the deposits increases. In general, Pleistocene-age sedimentary deposits are considered to have a high potential to contain significant paleontological resources, as is evident by the numerous fossil discoveries throughout

California (UCMP, 2021; Sub Terra Consulting, 2017)—as well as within Los Angeles County (UCMP, 2021a). The exact transition from Holocene- to Pleistocene-age deposits is not known in the planning area. In summary, the surficial Holocene-age alluvial deposits are considered to have a low potential to contain significant paleontological resources, with the potential increasing to high within the deeper layers of the unit; any Pleistocene-age deposits encountered in the subsurface are considered to have a high potential to encounter significant paleontological resources. Additionally, due to the previous fossil discoveries from within the Pliocene and Miocene-age deposits (UCMP, 2021b) from the County, the formations from this age range would be considered to have a high potential to contain significant paleontological resources as well.

Construction associated with the implementation of most GHG reduction measures could result in ground-disturbing activities that could have the potential to damage or destroy a unique paleontological resource or site or unique geologic feature. However, the specific locations of future projects are not known. Therefore, the specific resources present within a project footprint of construction sites cannot be determined. Factors necessary to identify specific impacts include the design and footprint of a project, and the type and precise location of construction activities. Project-level impacts would be addressed in future site-specific environmental analysis conducted by the County at the time such projects are proposed. Because there could be the potential for adverse changes to paleontological resources due to the construction and operations of future projects, this impact would be potentially significant. Impacts to paleontological resources are considered to be potentially significant and will be further evaluated in the EIR.

d) Disturb any human remains, including those interred outside of dedicated cemeteries?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions. As a policy document, the Draft 2045 CAP itself would not result in disturbance of human remains. However, future projects to implement some GHG reduction measures contained in the Draft 2045 CAP would involve ground disturbing activities that could, depending on their location, result in disturbance of human remains interred outside of a dedicated cemetery. Impacts to human remains are considered to be potentially significant and will be further evaluated in the EIR.

6. ENERGY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The Draft 2045 CAP provides an approach to the reduction of GHG emissions and associated co-benefits of reducing energy demand from community activities, including future development under the General Plan. Potential energy reductions provided by proposed Strategies, Measures, and Actions include increases in renewable energy production and improvement of energy efficiency.

The Draft 2045 CAP would be a policy document containing GHG emissions reduction measures and implementation actions to reduce GHG emissions. It does not propose any specific development or other physical changes to the environment and would not facilitate growth beyond what the General Plan would allow. To promote energy conservation, the County has adopted an amended California Green Building Standards Code per Title 31 (Green Building Standards) of the County Code. Therefore, any construction associated with projects undertaken to implement the Draft 2045 CAP would be required to be designed to comply with the performance levels of the California Green Building Standard Code, as amended in Title 31. Likewise, all such projects would be required to comply with the energy standards in the California Energy Code, Part 6 of the California Building Standards Code (Title 24) and the green building standards in Part 11 of Title 24.

Furthermore, the purpose and intended effect of the Draft 2045 CAP is to reduce GHG emissions generated in unincorporated areas of the County to help reduce the effects of climate change, including those emissions generated by energy demand and supply. The Draft 2045 CAP includes strategies, with corresponding implementation measures and actions, that would reduce energy use in buildings and decarbonizing the energy that is used, reduce indoor and outdoor water consumption through ordinances, tiered billing structures, education and outreach and/or promotion of conservation programs, and increasing the supply of energy to communities with zero-carbon or low-carbon electricity through a number of means including solar power generation, distributed or decentralized power generation, energy storage and microgrids, strategic partnerships with the Clean Power Alliance of Southern California and other actions. Specifically, the Draft 2045 CAP aims to reduce electricity use through increasing the efficiency of existing buildings (Measure E7), increasing the use of recycled water which would reduce electricity associated with water conveyance and distribution (Measure E8), and reducing indoor and outdoor water use (Measure E9). Further the Draft 2045 CAP would promote adoption of renewable energy production in both new and existing residential and commercial development (Measure E5), which would decrease grid energy demand and advance the County towards its electrification and zero net energy goals (Measure E3), all of which would support the State’s energy efficiency and renewable energy goals.

The Draft 2045 CAP would also include strategies, with corresponding implementation measures and actions, that would reduce vehicle miles traveled, emissions and transportation fuel consumption. The CAP includes transportation strategies, measures and actions that would reduce fuel consumption such as locating

development within High Quality Transit Areas, emphasizing non-motorized travel through the County's Pedestrian Action Plan, Bicycle Master Plan, Active Transportation Plans, and Vision Zero Action Plan and expanding the electric vehicle charging infrastructure, partnering with transit agencies to electrify County bus and shuttle fleets. For example, the Draft 2045 CAP aims to electrify 100 percent of its bus fleet by 2030 (Measure T7), in line with Metro's goal of electrification for its fleet. This would reduce diesel, gasoline, and natural gas consumption from buses and would have the co-benefit of reducing air pollutant and greenhouse gas emissions. Similarly, the Draft 2045 CAP would aim to electrify passenger and heavy-duty vehicles in line with the State's Mobile Source Strategy (Measure T6 and T8), which would reduce diesel, gasoline, and natural gas consumption of vehicles in support of State goals. The Draft 2045 CAPs waste measures (Measure W1 through W3) also would result in greater waste diversion from landfills and decreased waste generation per capita resulting in less fuel consumption from haul trucks to landfills and would generate energy through waste-to-energy conversion systems.

For these reasons, the Draft 2045 CAP would result in no impact regarding wasteful, inefficient, or unnecessary consumption of energy resources. and impacts would be less than significant. Because no impact would result, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

For the reasons explained in the context of criterion a), the Draft 2045 CAP would not cause an impact relating to a conflict with or obstruction of a state or local plan for renewable energy or energy efficiency. Because no impact would result, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

7. GEOLOGY AND SOILS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**

i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known active fault trace? Refer to Division of Mines and Geology Special Publication 42.**

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Alquist-Priolo Earthquake Fault Zoning Act (Alquist-Priolo Act) prohibits the development of structures for human occupancy across Holocene-active² fault traces. Under this Act, the California Geological Survey (CGS) has established “Zones of Required Investigation” on either side of an active fault that delimits areas susceptible to surface fault rupture. The zones are referred to as Earthquake Fault Zones (EFZs) and are shown on official maps published by the CGS (CGS 2021). Surface rupture occurs when the ground surface is broken due to a fault movement during an earthquake; typically, these types of hazards occur within 50 feet of an active fault.

The California Earthquake Hazards Zone Application (EQ Zapp) is an interactive map available on CGS’s website. The EQ Zapp allows users to view all available earthquake hazard zone data, including earthquake fault, liquefaction, and earthquake-induced landslide zones. According to the EQ Zapp, there are eight EFZs that cross through portions of unincorporated Los Angeles County including the East Montebello, Hollywood, Newport-Inglewood-Rose Canyon, San Andreas, San Gabriel, Santa Monica, Sierra Madre, and Raymond fault zones (CGS 2021).

The Draft 2045 CAP would be a policy document for unincorporated County that does not include the development of specific habitable structures that could be directly impacted by known EFZs. However, projects implementing Draft 2045 CAP measures would require project-specific evaluation once details are known. New projects encouraged by the Draft 2045 CAP measures could include habitable structures within or adjacent to EFZs. However, the construction of any new structure and improvements to certain existing structures in California is subject to the standards and requirements included in the most current versions of the California Building Code (CBC) and the County of Los Angeles Building Code (which is derived from the CBC). In general, the CBC requires that every newly constructed structure (habitable or not) be subject to a geotechnical review (usually a preliminary and final review). The CBC further requires that a fault study be included in the geotechnical review of any new development that is proposed near an active fault.

² Holocene-active faults are faults that have shown evidence of movement within the Holocene Epoch (11,700 years – present)

All new developments would be constructed in accordance with all applicable state and local laws (e.g., Alquist-Priolo Act, CBC, and the County Building Code). EFZs would be identified during the planning process for any new project, and avoided when deciding on the location of new habitable structures. Adherence to project-specific geotechnical recommendations and applicable state and local laws would ensure that any adverse effects due to the presence of a known EFZ would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

ii) Strong seismic ground shaking?

The County is located in an historically seismically active region of California, as is evident by the presence of several Holocene-active faults in the area. The 2014 Working Group on California Earthquake Probabilities³ (WGCEP) concluded that there is a 50 percent probability (approximate) that a magnitude (M_w) 6.7 earthquake or higher could occur in the Los Angeles region before the year 2044⁴, and a 53 percent chance of a M_w 6.7 (or higher) earthquake within the southern portion of the San Andreas fault zone before the year 2044 (Field et al., 2015). As discussed above, there are several faults that transect unincorporated Los Angeles County. The presence of these faults suggests that unincorporated Los Angeles County may be subjected to strong seismic ground shaking in the event of an earthquake in the region.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide wide GHG emissions and would support development allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Implementation of these strategies, measures and actions would not directly affect the potential to expose people or structures to adverse effects resulting from geologic hazards such as earthquakes.

Projects implementing Draft 2045 CAP measures would be subject to all relevant federal, state, and local regulations and building standards, including the CBC and the and County of Los Angeles Building Code. Compliance with applicable building codes would ensure that each new development has undergone a project-specific geotechnical review prior to issuance of permits, whereby project-specific geotechnical hazards would be identified and the specific design criteria would be incorporated into individual project design plans. Geotechnical design criteria are incorporated to ensure structures can withstand potential ground shaking from regional fault sources. Compliance with project-specific geotechnical design recommendations and all applicable building code standards and requirements would ensure that projects implementing Draft 2045 CAP measures would not cause substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

iii) Seismic-related ground failure, including liquefaction and lateral spreading?

Liquefaction is a phenomenon in which unconsolidated, water saturated sediments become unstable due to the effects of strong seismic shaking. During an earthquake, these sediments can behave like a liquid, potentially causing severe damage to overlying structures. Lateral spreading is a variety of minor landslide that occurs when unconsolidated liquefiable material breaks and spreads due to the effects of gravity, usually down gentle slopes. Liquefaction-induced lateral spreading has been defined as the finite, lateral displacement of

3 Also referred to as WGCEP 2014, this is a working group comprised of seismologists from the U.S. Geological Survey (USGS), California Geological Survey (CGS), Southern California Earthquake Center (SCEC), and California Earthquake Authority (CEA).

4 The probabilities generated by the WGCEP reflect the probability of an earthquake to occur within a given fault zone or geographic location, within 30 years of when the study was executed. The year 2014 was used as a starting point for the 30-year projection; the year 2044 is 30 years after 2014.

gently sloping ground as a result of pore-pressure buildup or liquefaction in a shallow underlying deposit during an earthquake (Rauch 1997). The occurrence of this phenomenon is dependent on many complex factors, including the intensity and duration of ground shaking, particle-size distribution, and density of the soil. In general, a relatively high potential for liquefaction exists in loose, sandy soils that are within 50 feet of the ground surface and are saturated (below the groundwater table).

The potential damaging effects of liquefaction include differential settlement, loss of ground support for foundations, ground cracking, heaving and cracking of structure slabs due to sand boiling, and buckling of deep foundations due to ground settlement. Dynamic settlement (i.e., pronounced consolidation and settlement from seismic shaking) may also occur in loose, dry sands above the water table, resulting in settlement of and possible damage to overlying structures. Lateral spreading can move blocks of soil, placing strain on buried pipelines that can lead to leaks or pipe failure.

According to the EQ Zapp, there are several areas of concern regarding liquefaction potential in unincorporated areas of the County (CGS 2021). The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Projects implementing Draft 2045 CAP measures could be subject to the effects of liquefaction and/or lateral spreading if they are proposed in susceptible areas, thereby exposing people and structures to the potentially damaging effects of liquefaction and/or lateral spreading. Earthquake-induced liquefaction or lateral spreading could occur in the unincorporated County, resulting in potential damage new structures and the public, which could cause various structural damage, service interruptions, and potential injury. However, projects implementing Draft 2045 CAP measures would be subject to all relevant federal, state, and local regulations and building standards, including the CBC and the and County of Los Angeles Building Code. Compliance with these standards and codes would ensure that each new development has undergone a project-specific geotechnical review prior to issuance of grading permits, whereby project-specific geotechnical hazards would be identified and the specific design criteria would be incorporated into individual project design plans. Geotechnical design criteria and proper soil engineering procedures would be incorporated to ensure problematic soils are accounted for and structures are able to withstand potential damage due to liquefaction and/or lateral spreading.

Compliance with project-specific geotechnical design recommendations and all applicable building code standards and requirements would ensure projects implementing Draft 2045 CAP measures would not cause substantial adverse effects, including the risk of loss, injury, or death involving strong liquefaction and/or lateral spreading. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

iv) Landslides?

Landslides are one of the various types of downslope movements (mass wasting) in which rock, soil, and other debris are displaced due to the effects of gravity. The potential for material to detach and move down slope depends on multiple factors including the type of material, water content, and steepness of terrain.

According to the EQ Zapp, there are several areas that have the potential for earthquake-induced landslides in the unincorporated County (CGS 2021). The Draft 2045 CAP would be a policy document intended to reduce County-wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Projects implementing Draft 2045 CAP measures would be subject to the effects of earthquake-induced landslides if they are proposed in susceptible areas, thereby exposing people and structures to the potentially damaging effects of landslides. Earthquake-induced landslides could occur in the unincorporated County, resulting in potential damage new

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

As discussed above, EQ Zapp indicates that there are several areas within the unincorporated County that are susceptible to earthquake-induced liquefaction, lateral spreading, and landslides. Additionally, according to the interactive map depicting areas of land subsidence in California, provided on the United States Geological Survey (USGS) website, there are areas within the unincorporated County that show evidence of land subsidence due to groundwater withdrawal (USGS 2021). New developments supporting Draft 2045 CAP measures could include projects that require dewatering during construction. Dewatering is a common technique used during construction to lower the water table when excavations are planned to be deeper than the existing water table. Dewatering involves the removal or draining of groundwater via various pumping methods. If excessive dewatering occurs as a result of individual projects supporting Draft 2045 CAP measures, it could exacerbate land subsidence in the region.

As discussed above, all new developments are obligated by state and local laws to comply with the CBC and County of Los Angeles Building Code. Compliance with the applicable building codes would ensure that each new development has undergone a project-specific geotechnical review prior to issuance of grading permits, whereby project-specific geotechnical hazards would be identified and the specific design criteria would be incorporated into individual project design plans. Geotechnical design criteria are incorporated into geotechnical reviews to verify the stability of nearby slopes and soils, and to provide recommendations to protect developments from causing or being affected by liquefaction, lateral spreading, landslides, and subsidence. Compliance with project-specific geotechnical design recommendations and all applicable building code standards and requirements would ensure that projects implementing the Draft 2045 CAP measures would not cause substantial adverse effects, including the risk of loss, injury, or death involving strong liquefaction, lateral spreading, landslides, and subsidence. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994)⁵, creating substantial direct or indirect risks to life or property?

Expansive soils are soils that possess a “shrink-swell” characteristic. Shrink-swell is the cyclic change in volume (expansion and contraction) that occurs in fine-grained clay sediments from the process of wetting and drying; the volume change is reported as a percent change for the whole soil. This property is measured using the coefficient of linear extensibility (COLE) (NRCS 2017). The Natural Resources Conservation Service (NRCS) relies on linear extensibility measurements to determine the shrink-swell potential of soils. If the linear extensibility percent is more than 3 percent (COLE=0.03), shrinking and swelling may cause damage to building, roads, and other structures (NRCS 2017). NRCS Web Soil Survey data indicates that the soils within unincorporated areas of the County have highly variable linear extensibility ratings with percentages ranging from 1.5 to 6.5, indicating linear extensibility ratings ranging from low to high (NRCS 2021a). New projects implementing CAP measures could be constructed on expansive soils.

⁵ The CBC, based on the International Building Code and the now defunct Uniform Building Code, no longer includes a Table 18-1-B. Instead, Section 1803.5.3 of the CBC describes the criteria for analyzing expansive soils.

However, sufficient independently enforceable laws, regulations, plans, and standards are in place to assure that the potential impact would be less than significant. The CBC requires geotechnical reviews to include soil testing, which identify the presence of a variety of geotechnical constraints related to soil quality, including the expansion potential of the soil. As discussed above, all new developments proposed in the unincorporated County would be subject to the standards and requirements included in the California and County building codes. Additionally, each new project implementing Draft 2045 CAP measures would be subject to individual project review. Project-specific reviews would identify any potential geotechnical hazards (such as the presence of expansive soils) and each project would adhere to the specific geotechnical requirements, as required by law. Compliance with state and local laws governing new development in the unincorporated County would ensure impacts related to expansive soils would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

e) Have soils incapable of adequately supporting the use of onsite wastewater treatment systems where sewers are not available for the disposal of wastewater?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Implementation of future development supported by the Draft 2045 CAP measures may generate waste water. Individual projects that include structures may connect to existing sewer lines, on-site septic tanks, and/or alternative waste water disposal systems (rare). In the event that a septic tank or alternative waste water disposal system installation is proposed, there is a testing a permitting process that would be completed prior to installation based on individual project-level review.

The Web Soil Survey provides septic tank absorption field data to inform developers of the suitability of soil for supporting the use of septic tanks and other alternative wastewater treatments systems. Web Soil Survey data suggests that the suitability of the soils in the unincorporated County varies from not limited to very limited and may have one or more features that are unfavorable to septic tank usage (NRCS 2021b). Any new development that would include the utilization of a septic tank or alternative waste water disposal system would be regulated by the Los Angeles County Department of Public Health (LACDPH) and the Land Use Program of the Environmental Health Division.

Home and business property owners that want to install or replace an onsite wastewater treatment system (OWTS) must submit an application and the required documents listed on the application in order to go through the OWTS review process. Obtaining a permit would be required prior to the construction of any septic tank or alternative waste water disposal system, and each system would be constructed within the parameters of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (SWRCB 2012). System design approvals may be submitted to the County Building and Safety Department prior to obtaining building permits for proposed projects.

As this procedure would be required prior to construction of any and all septic tanks and alternative wastewater disposal systems, all new projects implementing Draft 2045 CAP measures would be subject to these state and local requirements. Proper soils are essential for installation and maintenance of septic tank and alternative waste water disposal systems; compliance with these state and local requirements would ensure that impacts related to adequate soils for supporting such systems would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

f) Conflict with the Hillside Management Area Ordinance (L.A. County Code, Title 22, Ch.22.104)?

The Hillside Management Area (HMA) Ordinance is a component of the County’s General Plan and is designed to preserve significant natural features in hillside areas. HMAs are defined as areas with natural slopes of 25 percent or greater. Compliance with the Hillside Design Guidelines is required for development in HMAs, unless exempted under the HMA Ordinance’s provisions. In hillside areas with less than 25 percent slope, use of the Hillside Design Guidelines is optional but encouraged. These guidelines include specific and measurable design techniques that can be applied to residential, commercial, industrial, and other types of projects to ensure natural features in hillside areas are preserved.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Implementation of future activities supported by the Draft 2045 CAP measures could occur within HMA designated areas. If so, the new development would be regulated under the HMA Ordinance and subject to the Hillside Design Guidelines on a project specific basis. Requisite compliance with the ordinance would assure that new projects implementing Draft 2045 CAP measures would not result in a significant impact. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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8. GREENHOUSE GAS EMISSIONS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
Would the project:				
a) Generate greenhouse gas (GHGs) 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"/>

The Draft 2045 CAP would provide an approach to the reduction of GHG emissions from community activities, including future development under the General Plan. The Draft 2045 CAP, if adopted, would establish County-wide GHG reduction targets of: 25 percent below 2015 levels by 2025; 40 percent below 2015 levels by 2030; 50 percent below 2015 levels by 2035; and carbon neutrality⁶ by 2045. While significant impacts are not anticipated, potential GHG emissions reductions provided by proposed Strategies, Measures, and Actions and consistency with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions will nonetheless be further evaluated in the EIR.

b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The potential for implementation of the Draft 2045 CAP to conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs will be evaluated further in the EIR. Applicable plans, policies, or regulations that will be evaluated in the EIR include the 2017 Climate Change Scoping Plan, the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, the Renewables Portfolio Standard (Senate Bill 1078 and subsequent amendments in Senate Bill 100), and the California Building Energy Efficiency Standards and Green Building Code (Title 24, Parts 6 and 11). While the Draft 2045 CAP would be designed to be consistent with state and local GHG reduction plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases, and significant impacts are not anticipated, the EIR analysis will nevertheless analyze the potential for conflicts.

⁶ Carbon neutrality means “net zero” emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of carbon dioxide that is stored, both in natural sinks and through mechanical sequestration.

9. HAZARDS AND HAZARDOUS MATERIALS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, storage, production, use, or disposal of hazardous materials?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Future construction activities associated with projects implementing Draft 2045 CAP measures could involve the use of standard construction equipment and materials, which would include the following commonly used materials and substances: fuel, oils and lubricants, hydraulic fluid, paints and thinners, and cleaning solvents to maintain vehicles and motorized equipment. Routine use of any of these substances could pose a hazard to people or the environment and, unless handled in accordance with regulatory requirements, could cause a potential significant impact.

There are numerous laws and regulations that regulate the transportation, handling, storage, and disposal of hazardous materials. The Health and Safety Code and the California Code of Regulations require preparation of a Hazardous Materials Business Plan/Spill Prevention Control and Countermeasures Plan (HMBP/SPCC) when conditions have been determined to warrant regulation and, when required, that they be prepared prior to construction. HMBPs include best management practices (BMPs) for the transport, storage, use, and disposal of hazardous materials and waste. HMBPs also include information regarding construction activities, worker training procedures, and hazardous materials inventory procedures.

Any fuel tanks required for a project implementing the Draft 2045 CAP would be maintained and operated according to all local, state, and federal regulations during construction and operation, and hazardous material storage would be detailed in a SPCC Plan. Refueling and general maintenance for construction equipment, such as changing fluids and lubricating parts, also would be subject to sufficient containment capabilities and according to measures outlined in an SPCC Plan.

During construction of projects implementing Draft 2045 CAP measures, waste disposal and collection receptacles would be located on-site to ensure proper disposal of hazardous materials in accordance with regulatory requirements. Additionally, construction activity would be subject to the Construction General Permit and its required SWPPP, which include BMPs to control potentially contaminated run-off from construction sites.

Compliance with applicable federal, state, and local laws and regulations would ensure that any impact resulting from projects implementing 2045 CAP measures would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials or waste into the environment?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. As discussed above, the adoption of the Draft 2045 CAP could lead to new developments in support of 2045 CAP measures. During the construction of projects implementing Draft 2045 CAP measures, construction activities may involve the transportation, storage, use, or disposal of a variety of hazardous materials, including batteries, hydraulic fluid, diesel fuel, gasoline, grease, lubricants, paints, solvents, and adhesives. Additionally, if future developments are affected by the presence of known hazardous materials sites, the removal and handling of hazardous wastes could lead to an accidental release. If during the course of development, hazardous materials were accidentally released into the environment, a potential significant impact could result.

As previously noted, there are numerous laws and regulations that regulate the transportation, handling, storage, and disposal of hazardous materials. The required HMBP and SPCC Plan discussed above would include procedures that would help prevent the accidental release of hazardous materials into the environment. A standard HMBP and SPCC Plan would include BMPs as well as spill control and spill response measures to ensure any potential release would be handled appropriately. In the event that a spill did occur, the SPCC would include appropriate measures to ensure that workers cease work activities to contain any release and enact the protocols for cleanup including the notification of appropriate agencies and the use of materials stored onsite such as absorbent pads to minimize the spread or exposure.

Accidents or mechanical failure involving heavy equipment could result in the accidental release of fuel, lubricants, hydraulic fluid, or other hazardous substances. These types of spills on construction sites are typically in small quantities, localized, and cleaned up in a timely manner. Construction contractors are contractually responsible for their hazardous materials and are required under their contract to properly store and dispose of these materials in compliance with state and federal laws, including implementing a HMBP/SPCC. As discussed, projects implementing CAP measures would require coverage under the Construction General Permit (or related stormwater permit), and so would be subject to the protections included in a SWPPP, which would outline BMPs to contain a potential release and to prevent any such release from reaching an adjacent waterway or stormwater collection system (e.g., erosion control, sediment control, and waste management). As the location of future development is not known at the time of this analysis, it is not known whether new developments would be proposed on or near known hazardous materials sites.

If a future development is planned on or near a known hazardous materials site, then previously or currently contaminated soil or groundwater may be encountered during construction activities (e.g., grading, excavation, utility installation, soil remediation, etc.), and could result in a significant impact. To account for this potential, Mitigation Measure HAZ-1 shall be included in any future environmental document that will be prepared during subsequent project-specific evaluations, in compliance with CEQA.

Compliance with applicable federal, state, and local laws and regulations and the applicable BMPs and HMBP/SPCC plan, ensure that any impact resulting from projects implementing Draft 2045 CAP measures would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of sensitive land uses?

Some populations (e.g., children, elderly, sick or disabled persons) are more susceptible to health effects of hazardous materials than the general population. Hazardous materials used near schools, day care centers, senior living communities, hospitals, etc., must consider potential health effects to these populations, often referred to as “sensitive receptors.” Construction or redevelopment on contaminated properties that could potentially generate vapors or fugitive dust containing contaminants may potentially pose a health risk to these populations. In addition, commercial businesses in proximity to sensitive receptors may have hazardous emissions or handle hazardous or acutely hazardous materials or wastes that could pose a health risk to these sensitive receptors.

As discussed in Section 3, *Air Quality*, there are several sensitive receptors and receptor locations within the unincorporated County, and it is not known at the time of this analysis whether projects implementing Draft 2045 CAP measures would be constructed in proximity to one or more of them. Typically, developments that would handle hazardous materials or discharge hazardous emissions within one-quarter mile of a sensitive receptor are at risk of exposing sensitive receptors to hazardous materials and emissions. While the Draft 2045 CAP adoption would not directly cause hazardous emissions, it would encourage new developments that could create hazardous emissions. Impacts generated by the release of hazardous emissions in proximity to sensitive receptors would occur during construction phases and would be temporary.

To protect sensitive receptors, Section 17210 et seq. of the State Education Code, Sections 21151.2 and 21151.4, and 21151.8 of the Public Resources Code require that prospective school sites be reviewed to determine that such sites are not a current or former hazardous waste disposal site, a hazardous substance release site, or the site of hazardous substance pipelines. These laws also require consultation with local hazardous materials agencies and air quality districts to ensure that sites within one-quarter mile of a school that handle or emit hazardous substances would not potentially endanger sensitive receptors.

The other federal, state, and local laws and regulations that regulate hazardous materials, discussed above in criteria a) and b) and in criterion d) below, also would be applied to any activities involving handling hazardous materials or releasing hazardous emissions within one-quarter mile of a sensitive receptor. Compliance with the applicable federal, state, and local laws and regulations would ensure any potential impacts to sensitive receptors would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

The provisions in Government Code Section 65962.5, commonly referred to as the “Cortese List,” require the DTSC to compile and maintain a list of Hazardous Waste and Substances sites, including SWRCB leaking underground storage tank (LUST) Sites, active Cease and Desist Orders (CDO) and Cleanup and Abatement Orders (CAO), and certain solid waste disposal sites and hazardous waste facilities. As discussed in the context of criterion a), above, there are several hazardous materials sites within the unincorporated County, many of which are included on the Cortese List. If new developments implementing Draft 2045 CAP measures are

proposed on or near hazardous materials sites that have been included on the Cortese List, then the risk of creating a significant hazard to the public or environment increases, as potentially contaminated soil and/or groundwater could be exposed during ground-disturbing activities. A potential significant impact would occur if new development implementing Draft 2045 CAP measures on or near a site listed on the Cortese List exposed hazardous materials to people or the environment.

The previously discussed laws governing the use, transportation, storage, and disposal of hazardous materials would apply to developments proposed on or near Cortese List sites. In addition, sites listed on the Cortese List are under the jurisdiction of a regulatory agency (e.g., Department of Toxic Substances Control [DTSC] or Regional Water Quality Control Board [RWQCB] or a local agency), hence the reason for their inclusion on the Cortese List. As such, the overseeing regulatory agency is in the process of requiring the owners/operators of listed sites to bring their sites into compliance. This includes requiring sites with spills or releases to soil and/or groundwater to investigate and clean up their sites to levels that no longer pose risks to people or the environment. The listings on the Cortese List are public records. At the time when a specific project is implemented, the current status of nearby sites on the Cortese list can be checked and the project planned accordingly to comply with the overseeing regulatory agency requirements, if any. Compliance with applicable federal, state, and local laws and regulations would ensure that any potential impacts would be considered less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

According to the County’s General Plan and the Los Angeles County Airport Land Use Plan (ALUP), there are 14 airports within the County (Los Angeles County ALUC, 2004), all of which would be within two miles of at least a portion of the unincorporated County. The airports in the County are as follows:

- Agua Dulce Airport
- Compton/Woodley Airport
- Hawthorne Municipal Airport
- Hollywood Burbank Airport
- El Monte Airport
- Long Beach Municipal Airport
- Los Angeles International Airport
- Palmdale Regional Airport
- Santa Monica Municipal Airport
- Van Nuys Airport Burbank Airport
- Whiteman Airport
- Brackett Field
- Zamperini Field
- General Williams J. Fox Airfield

The Draft 2045 CAP would be a policy document intended to reduce unincorporated wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. As the Draft 2045 CAP could result in new projects implementing Draft 2045 CAP measures within the unincorporated County, adoption of the Draft 2045 CAP could result in new developments being located within a delineated safety or noise hazard zone and could result in a safety hazard or excessive noise for people residing or working in the area.

The Federal Aviation Administration (FAA) identifies and regulates potential impacts related to air traffic and related safety hazards. The FAA’s Federal Aviation Regulation (FAR) at 14 CFR Part 77 establishes standards and notification requirements for objects affecting navigable airspace. These potential impacts are regulated at the federal level; as such, all new developments that may be proposed within any airport safety or noise hazard zones, or that would include components that may cause a safety hazard, would be obligated to comply with FAA regulations. Additionally, any development proposed in a delineated safety or noise hazard zone (as provided by the County ALUP) would be required to comply with any requirements included in the County ALUP. Through compliance with FAA regulation and the County ALUP guidelines, potential impacts resulting from the adoption of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The 2019 County of Los Angeles All-Hazards Mitigation Plan does not include specific evacuation routes to be used in the event of an emergency (County of Los Angeles 2019). However, the County’s General Plan includes a map of freeway and highway Disaster Routes, many of which cross through portions of the unincorporated County (Los Angeles County 2015). Depending on the nature of projects implementing Draft 2045 CAP measures, they may require construction in major roadways or the closure of major roadways to facilitate construction activities. If construction activities within major roadways or road closures were required to facilitate projects implementing Draft 2045 CAP measures, then activities could obstruct major roadways and could hinder evacuation procedures.

Although the locations and details of potential projects implementing Draft 2045 CAP measures are not known at the time of this analysis, such projects would be subject to individual project review pursuant to the grading or building permit application process. If, based on such review, it is determined that a specific project could conflict with an emergency response or evacuation plan, then a project-specific traffic control plan would be required to avoid such conflicts. Because any potential impacts to the implementation of an emergency response or evacuation plan would be identified and addressed before a related impact could occur, the impacts associated with implementation of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving fires, because the project is located: (i) within a high fire hazard area with inadequate access; (ii) within an area with inadequate water and pressure to meet fire flow standards; (iii) within proximity to

land uses that have the potential for dangerous fire hazard; or (iv) would constitute a potentially dangerous fire hazard.

According to fire hazard mapping by the California Department of Forestry and Fire Protection (CAL FIRE), as part of the Fire and Resource Assessment Program (FRAP), there are several areas of the unincorporated County that are classified as Very High Fire Hazard Severity Zones (VHFHSZ) (CAL FIRE 2012). The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. If new projects implementing Draft 2045 CAP measures would involve construction activities, then the use of construction equipment and the possible temporary on-site storage of fuels and/or other flammable construction chemicals could pose an increased fire risk resulting in injury to workers or the public during construction. However, contractors would be required to comply with hazardous materials storage and fire protection regulations, which would minimize potential for fire creation.

Further, a detailed site-specific, project-specific fire risk analysis would occur for any proposed new development that would be subject to a project-specific CEQA analysis. If it is determined during the CEQA process that the implementing project would be constructed within or adjacent to a VHFHSZ, or future project activities would exacerbate an existing fire risk, then mitigation measures would be proposed at the time to address the potential fire risk. In addition to any project-specific fire-related mitigation recommendations, any new development within Los Angeles County (included the unincorporated areas) would be subject to Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance with the County Fire Code would also ensure developments that are within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques.

Given that any project that would result from the adoption of the Draft 2045 CAP would address fire risks at the time of development, and that any future development would be required to comply with the County Fire Code, the impacts as a result of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

References

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State Water Resources Control Board (SWRCB), 2021. GeoTracker database. Hazardous materials sites in Los Angeles County.

10. HYDROLOGY AND WATER QUALITY

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?**

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Less than Significant Impact. The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP would not include measures or actions that would degrade surface or groundwater quality or violate any water quality standards or waste discharge requirements. However, projects implementing Draft 2045 CAP measures, depending on the nature of future developments, could include activities that may create an impact to surface or groundwater quality.

Projects implementing Draft 2045 CAP measures within the unincorporated County would be required to comply with independently enforceable requirements of the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities Order 2012-0006-DWQ (Construction General Permit) and the Los Angeles County Municipal Separate Storm Water System (MS4) Permit. Compliance with the provisions of these permits would ensure that construction activities would not create a significant adverse impact to water quality. In addition, new projects would be required to undergo a project-specific CEQA analysis, during which any potential impact to water quality would be identified and addressed during the planning process. Therefore, implementation of the Draft 2045 CAP would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. As a result, impacts would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

b) **Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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As discussed above, the Draft 2045 CAP would not directly impact water resources, including groundwater resources. While the adoption of the Draft 2045 CAP would not directly impact groundwater supplies or groundwater recharge, it could encourage new projects implementing Draft 2045 CAP measures in unincorporated areas of the County. Depending on the nature of future developments, they could include activities that may impact groundwater supplies and groundwater recharge. However, the Draft 2045 CAP would include a number of actions to increase the use of alternate water sources and reduce water consumption.

While the Draft 2045 CAP may promote development that may require water for construction and operation, these developments would be required to comply with the Draft 2045 CAP measures that require net zero water in new development and significant reductions in indoor and outdoor water use for municipal,

commercial, and industrial development. Therefore, overall, the strategies and measures proposed in the Draft 2045 CAP would result in reductions in water demand. While the Draft 2045 CAP may result in the development of facilities that would require water for construction and operation, these developments would be required to comply with the adopted Draft 2045 CAP; therefore, would be required to be net zero water and would not result in additional water demand. Therefore, the Draft 2045 CAP would have a beneficial impact with regard to water supply, impacts would be less than significant and these considerations will not be evaluated further in the EIR.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of a Federal 100-year flood hazard area or County Capital Flood floodplain; the alteration of the course of a stream or river; or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site; (ii) substantially increase the rate, amount, or depth of surface runoff in a manner which would result in flooding on- or off-site; (iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (iv) impede or redirect flood flows which would expose existing housing or other insurable structures in a Federal 100-year flood hazard area or County Capital Flood floodplain to a significant risk of loss or damage involving flooding?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The adoption of the Draft 2045 CAP would not directly cause alterations to drainage patterns through alteration of the course of a stream or river, or through the addition of impervious surfaces. It is possible, however, that future projects implementing Draft 2045 CAP measures would include activities that could contribute to the alteration of an existing drainage pattern of a site. The General Plan Safety Element includes goals and policies that would discourage development within delineated flood hazard zones; the Safety Element is currently undergoing an update and it expected that similar or more stringent goals and policies will be included. Compliance with the existing and newly adopted goals and policies would ensure that impacts would be less than significant, and this potential impact will not be evaluated further in the EIR.

d) Otherwise place structures in Federal 100-year flood hazard or County Capital Flood floodplain areas which would require additional flood proofing and flood insurance requirements?

The adoption of the Draft 2045 CAP would not place structures within a flood hazard or floodplain area. The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. However, it is not known at the time of this analysis whether the adoption

of the Draft 2045 CAP would encourage new developments within a flood hazard or floodplain area. However, as discussed above, the existing General Plan goals and policies discourage new development in flood hazard or floodplain areas. Compliance with the goals and policies included in the General Plan would ensure impacts would be less than significant, and potential impacts will not be evaluated further in the EIR.

e) Conflict with the Los Angeles County Low Impact Development Ordinance (L.A. County Code, Title 12, Ch. 12.84)?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. New projects implementing Draft 2045 CAP measures would be evaluated independent of the Draft 2045 CAP for compliance with the Los Angeles County Low Impact Development (LID) Ordinance.

New developments within the unincorporated County also could be subject to the National Pollutant Discharge and Elimination System (NPDES) General Permit for Stormwater Discharge Associated with Construction and Land Disturbance Activities Order 2012-0006-DWQ (Construction General Permit) and the Los Angeles County Municipal Separate Storm Water System (MS4) Permit. Compliance with the provisions of these permits would ensure that construction activities would further assure project consistency with the County LID Ordinance. Requisite compliance with the independently enforceable requirements of the LID Ordinance would assure that adoption and implementation of the Draft 2045 CAP would result in no impact relating to this criterion. Accordingly, this criterion will not be evaluated further in the EIR.

f) Use onsite wastewater treatment systems in areas with known geological limitations (e.g., high groundwater) or in close proximity to surface water (including, but not limited to, streams, lakes, and drainage course)?

Less than Significant Impact. The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Potential future projects implementing Draft 2045 CAP measures may connect to existing sewer lines, on-site septic tanks, and/or alternative waste water disposal systems (rare). In the event that a septic tank or alternative waste water disposal system installation is proposed, a testing and permitting process would need to be completed prior to installation.

The Web Soil Survey provides septic tank absorption field data to inform developers of the suitability of soil for supporting the use of septic tanks and other alternative wastewater treatments systems. Web Soil Survey data suggests that the suitability of the soils in the unincorporated County varies not limited to very limited and may have one or more features that are unfavorable to septic tank usage (NRCS 2021). Any new development that would include the utilization of a septic tank or alternative waste water disposal system, would be regulated by the Los Angeles County Department of Public Health (LACDPH) and the Land Use Program of the Environmental Health Division.

Home and business property owners that want to install or replace an onsite wastewater treatment system (OWTS) must submit an application and the required documents listed on the application in order to go

through the OWTS review process. Obtaining a permit would be required prior to the construction of any septic tank or alternative waste water disposal system, and each system would be constructed within the parameters of the State Water Resources Control Board (SWRCB) Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems (SWRCB 2012). System design approvals may be submitted to the County Building and Safety Department prior to obtaining building permits for proposed projects.

As this procedure would be required prior to construction of any and all septic tanks and alternative waste water disposal systems, all new developments would be subject to these state and local requirements. Proper soils are essential for installation and maintenance of septic tank and alternative waste water disposal systems; requisite compliance with these independently enforceable state and local requirements would ensure that adoption and implementation of the Draft 2045 CAP would have no impact related to this criterion. Accordingly, this criterion will not be evaluated further in the EIR.

g) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Adopting the Draft 2045 CAP would not directly result in an increased risk of release of pollutants due to inundation by a flood, tsunami, or seiche. According to the General Plan, there are several areas that have been mapped as a flood hazard zones and the entire County coastline is considered a tsunami hazard area (Los Angeles County 2015a; Los Angeles County 2015b). The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element.

Although adoption of the Draft 2045 CAP would not directly result in the release of pollutants, it is possible that future projects implementing Draft 2045 CAP measures could be located in or near a flood or tsunami hazard zone. However, it is not known at the time of this analysis whether the adoption of the Draft 2045 CAP would encourage new developments that would release pollutants due to inundation in flood hazard, tsunami, or seiche zones. If future developments subject to a discretionary agency approval are proposed in areas of flood or tsunami risk, then project-specific CEQA analyses would be required. However, as discussed above, the existing General Plan goals and policies discourage new development in flood hazard or floodplain areas. Compliance with the goals and policies included in the General Plan would ensure impacts would be less than significant. This consideration will not be evaluated further in the EIR.

h) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Adoption of the Draft 2045 CAP would not directly affect the beneficial uses of surface waters governed in the basin plan or involve direct extraction of groundwater.

The Los Angeles Regional Water Quality Control Board describes its water quality control plan as follows: “Los Angeles Regional Board’s Basin Plan is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan: (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the state's antidegradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the Basin Plan.” The

Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties is available online (Los Angeles RWQCB 2021).

The Sustainable Groundwater Management Act (SGMA), which became law in 2014, created a new structure for local groundwater management by local agencies through groundwater sustainability agencies (GSAs) toward achieving sustainable groundwater management within 20 years. The formation of GSAs for all basins that have been designated as high- and medium-priority groundwater basins was required by July 1, 2017. Each GSA for these high- and medium-priority basins must then develop a groundwater sustainability plan (GSP) that details how sustainable groundwater management will be achieved within 20 years of implementing the GSP. The GSP is a tool used to help the GSA sustainably manage the basin. The Department of Regional Planning represents the County of Los Angeles on two GSAs: Santa Clarita Valley GSA and Santa Monica Basin GSA.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. It is possible that future projects would be developed as part of furthering the goals of the Draft 2045 CAP, and that such projects could include activities that may conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. However, any future projects would be subject to the independently enforceable requirements of the of the basin plan and SGMA. This requisite compliance would assure that the Draft 2045 CAP would have no impact relative to this criterion. Accordingly, this criterion will not be evaluated further in the EIR.

References

County of Los Angeles, 2015a. Los Angeles County General Plan 2035. Chapter 12, Safety Element. Tsunami Hazard Area.

County of Los Angeles, 2015b. Los Angeles County General Plan 2035. Chapter 12, Safety Element. Flood Hazard Zones.

Los Angeles RWQCB, 2020. Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties. Available online: https://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.html. Page updated May 18, 2020.

Natural Resources Conservation Service (NRCS), 2021. Web Soil Survey. Septic Tank Absorption Fields—Contra Costa County, California. Map. Scale 1:24,500.

State Water Resources Control Board (SWRCB), 2012. Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Water Treatment Systems. June 19, 2012.

11. LAND USE AND PLANNING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Physically divide an established community?

The Draft 2045 CAP would be a policy level document that does not include site-specific projects or proposals that could physically divide an established community. The Draft 2045 CAP would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and future activities supported by the Draft 2045 CAP are anticipated to be located primarily within established communities. Therefore, the Draft 2045 CAP would have no direct impacts.

The projects implementing Draft 2045 CAP strategies would generally improve connections between and within communities. Examples of measures proposed in the Draft 2045 CAP that would encourage infill development to increase density to the extent allowed in the General Plan near high quality transit areas are Measures T1 and T2. Development of transit, bicycle transit and pedestrian routes would be encouraged by Measures T3 and T4. Draft 2045 CAP Measures E1, E5, E8, and W1 could promote the construction of facilities such as solar generation, water recycling, or waste management facilities. Implementation of these types of projects would be subject to project level review and are typically designed to connect to the communities they are anticipated to serve. No changes to General Plan land use designations are proposed as part of the Draft 2045 CAP. Therefore, adoption of the Draft 2045 CAP would result in no impacts relating to the potential to divide an established community. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

b) Cause a significant environmental impact due to a conflict with any County land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The Draft 2045 CAP would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and no changes to land use designations are proposed. The CAP is part of the Air Quality Element of the General Plan and adoption of the Draft 2045 CAP would replace the CCAP and require a General Plan Amendment. While significant impacts are not anticipated, this issue will nonetheless be further evaluated in the EIR to provide a more detailed analysis of the Draft 2045 CAP's consistency with existing land use plans and zoning. Most notably, the analysis will evaluate the CAP's consistency with the General Plan, its respective elements (including the 2021-2029 Housing Element), and SCAG's 2020-2045 RTP/SCS (Connect SoCal).

c) Conflict with the goals and policies of the General Plan related to Hillside Management Areas or Significant Ecological Areas?

The Draft 2045 CAP would be a policy level document that would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and no changes to land

use designations are proposed. The potential for the Project to conflict with policies related to Hillside Management Areas are analyzed in Section 7, Geology and Soils, under criterion f). As described in Section 7, no impact would result. The potential for the Project to conflict with policies related to the management of Significant Ecological Areas is addressed in Section 4, Biological Resources, under criterion f). As indicated in that section, the possibility that the Draft 2045 CAP could conflict with the goals and policies of the General Plan related to SEAs would be less than significant and this will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

12. MINERAL RESOURCES

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

- a) **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

The General Plan includes a map of designated Mineral Resource Zones (MRZs) locations within the County (County of Los Angeles 2015). The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Projects implementing Draft 2045 CAP measures could be proposed in the area of a known mineral resource that would be of value to the region and the residents of the state and, as a result, could result in the loss of availability to such resources. However, the Conservation and Natural Resources Element of the General Plan includes goals and policies that are designed to protect significant mineral resources and to ensure that new developments proposed in designated MRZs are not lost or destroyed. Additionally, the Surface Mining and Reclamation Act of 1975 (SMARA) regulates surface mining operations to assure that adverse environmental impacts are minimized, and mined lands are reclaimed to a usable condition. SMARA also encourages the production, conservation, and protection of the state’s mineral resources.

As compliance with SMARA and the General Plan goals and policies protecting mineral resources would be required prior to construction of any new developments in MRZs, all new projects implementing Draft 2045 CAP measures would be subject to these state and local requirements. Compliance with these state and local requirements would ensure that adoption of the Draft 2045 CAP would not result in the loss of availability of known mineral resources. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

- b) **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

For the reasons discussed in the context of criterion a), adoption and implementation of projects in furtherance of the Draft 2045 CAP could result in a potential significant impact related to this criterion. However, as discussed in criterion a), any new developments encouraged by adoption of the Draft 2045 CAP would be subject to existing goals and policies included in the General Plan, as well as the SMARA. Accordingly, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

References

Los Angeles County, 2015. Los Angeles County General Plan 2035. Chapter 9, Conservation and Natural Resources Element. Mineral Resources Zones.

13. NOISE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project result in:

<p>a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the County General Plan or noise ordinance (Los Angeles County Code, Title 12, Chapter 12.08), or applicable standards of other agencies?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP identifies Strategies, Measures, and Actions to provide an approach for the reduction of GHG emissions from community activities, including future development under the General Plan. While the Draft 2045 CAP would not directly result in development, implementation of the CAP could indirectly result in construction and operation of future development what would increase noise levels in unincorporated areas of the County. During construction associated with future development, the potential would exist for temporary or periodic increases in noise levels and/or ground-borne noise and vibration levels on and adjacent to project sites. This potential significant impact will be analyzed further in the EIR.

<p>b) Generation of excessive groundborne vibration or groundborne noise levels?</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP identifies Strategies, Measures, and Actions to provide an approach for the reduction of GHG emissions from community activities, including future development under the General Plan. While the Draft 2045 CAP would not directly result in development, implementation of the CAP could indirectly result in temporary construction activities of future development that could increase groundborne vibration or groundborne noise levels in unincorporated areas of the County. This potential significant impact will be analyzed further in the EIR.

<p>c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Los Angeles County includes a large number of public- and private-use airports that contribute to the noise environment, including in unincorporated areas of the County. Adoption of the Draft 2045 CAP would not directly result in development within plan areas of Airport Land Use Compatibility Plans (ALUCPs). Implementation of the CAP could indirectly result in development within ALUCPs, including the comprehensive Los Angeles County ALUCP and the ALUCP for the General William J. Fox Airfield. However, independent of the Draft 2045 CAP, future development would be required to be consistent with any applicable ALUCP constraints. Furthermore, compliance with policies included in the Land Use Element

and Noise Element of the General Plan related to land use compatibility would ensure that future development would not conflict with ALUPs. In particular, General Plan Policy LU 7.6 explicitly requires consistency that airport land use plans address conflicts between airport operations and surrounding land uses. Policy N 1.12 requires that land use decisions on parcels adjacent to transportation facilities, including those adjacent to airports, consider existing and future noise levels of the adjacent transportation facilities. Requisite compliance with independently enforceable obligations of ALUPs and the General Plan would ensure that the Draft 2045 CAP would result in a less than significant impact relative to the potential exposure of people residing or working in unincorporated areas of the County to excessive airport or airstrip noise. Accordingly, this criterion will not be evaluated further in the EIR.

14. POPULATION AND HOUSING

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would support development allowed under the General Plan land use assumptions with the 2021-2021 Housing Element. The Draft 2045 CAP would be a policy level document that does not include site-specific projects or proposals that could directly induce population growth. Projects implementing Draft 2045 CAP policies are anticipated to primarily be located within the urban environment and in disturbed areas with existing infrastructure. The Draft 2045 CAP includes Measure T1 to encourage density near high-quality transit areas and Measure T2 to develop land use plans addressing jobs/housing balance and increased mixed use to the extent allowed by the General Plan. No changes to General Plan land use designations are proposed. Therefore, the Draft 2045 CAP would not result in an unanticipated increase in density or population growth outside of what was accounted for in the General Plan with the 2021-2029 Housing Element. Therefore, impacts would be less than significant, and this issue will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

b) Displace substantial numbers of existing people or housing, especially affordable housing, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. Implementation of the measures in the Draft 2045 CAP would involve retrofitting existing building or requiring new developments incorporate water conservation systems, energy efficiency upgrades, and sustainable waste management upgrades. These retrofits and upgrades for new developments are not anticipated to displace existing housing or people. Some of the CAP strategies could promote the construction of larger projects such as solar facilities, water recycling facilities, and waste management facilities. These types of facilities are typically sited away from existing residential areas and would not be likely to displace existing housing. Projects implementing Draft 2045 CAP measures would be evaluated for project level compliance with existing regulations and environmental requirements once details are known. Draft 2045 CAP Impacts would be less than significant and will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

and construction of structures, subdivisions, and developments in an SRA provide for basic emergency access and perimeter wildfire protection measures.

2019 California Fire Code

The California Fire Code (24 CCR Part 9) establishes regulations to protect life and property from the hazards of fires in new and existing buildings and structures. The Fire Code also establishes requirements intended to provide safety and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout the State of California. The Fire Code includes regulations regarding fire resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire service features such as fire apparatus access roads, means of egress fire safety during construction and demolition, and wildland-urban interface areas.

Los Angeles County 2035 General Plan

The Safety Element of the General Plan provides the following goals and policies potentially relevant to the Draft 2045 CAP (County of Los Angeles 2015):

Goal S 4: Effective County emergency response management capabilities.

- Policy S 4.1:** Ensure that residents are protected from the public health consequences of natural or man-made disasters through increased readiness and response capabilities, risk communication, and the dissemination of public information.
- Policy S 4.2:** Support County emergency providers in reaching their response time goals.
- Policy S 4.3:** Coordinate with other County and public agencies, such as transportation agencies, and health care providers on emergency planning and response activities, and evacuation planning.
- Policy S 4.4:** Encourage the improvement of hazard prediction and early warning capabilities.
- Policy S 4.5:** Ensure that there are adequate resources, such as sheriff and fire services, for emergency response.
- Policy S 4.6:** Ensure that essential public facilities are maintained during natural disasters, such as flooding.

The Public Services and Facilities Element of the General Plan provides the following goals and policies potentially relevant to the Draft 2045 CAP (County of Los Angeles 2015):

Goal PS/F 1: A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.

- Policy PS/F 1.1:** Discourage development in areas without adequate public services and facilities.
- Policy PS/F 1.2:** Ensure that adequate services and facilities are provided in conjunction with development through phasing or other mechanisms.

- Policy PS/F 1.3:** Ensure coordinated service provision through collaboration between County departments and service providers.
- Policy PS/F 1.4:** Ensure the adequate maintenance of infrastructure.
- Policy PS/F 1.5:** Focus infrastructure investment, maintenance and expansion efforts where the General Plan encourages development.
- Policy PS/F 1.6:** Support multi-faceted public facility expansion efforts, such as substations, mobile units, and satellite offices.
- Policy PS/F 1.7:** Consider resource preservation in the planning of public facilities.

Developer Fee for the Consolidated Fire Protection District of Los Angeles County

In response to increasing demands for new facilities, equipment, and staffing created by new development, the County has implemented a Developer Fee Program to fund the purchase of fire station sites, the construction of new stations, and the funding of certain capital equipment in the high-growth areas of the County (County of Los Angeles 2020a). The developer fees, which are specified in the Developer Fee Detailed Fire Station Plan (County of Los Angeles 2020a), are paid to the Consolidated Fire Protection District of Los Angeles County (Fire District). This Fire District developer fee is adjusted annually and is charged on all new development, including residential buildings, new detached residential accessory structures, new commercial buildings, and new additions over 2,000 square feet prior to building permit issuance.

Los Angeles County Title 22 Planning and Zoning Codes – Mitigation Fees Section 22.246.060

Section 22.246.070 Law Enforcement Facilities Fee

According to Chapter 22.14, Definitions, of Los Angeles County’s Title 22 Planning and Zoning Code, law enforcement fees provide funds for law enforcement facilities related to residential, commercial, office, and/or industrial development projects. The amount to be paid is determined based on which law enforcement facilities fee zone the proposed project is located in: Zone 1: Santa Clarita Zone, Zone 2: Newhall Zone, and Zone 3: Gorman Zone.

Library Facilities Mitigation Fee

According to the County’s General Plan, the library facilities mitigation fee is based on the estimated cost of providing the projected library facility needs in each library planning area (County of Los Angeles 2015). The mitigation fee shall provide funds for library facilities related to a residential development project.

School District Developer Fees

Los Angeles Unified School District has developer fee collection rates for residential and commercial/industrial developments. Compton Unified School District collects developer fees for residential and commercial/industrial developments. Districts that do not collect developer fees include Montebello Unified, Pasadena Unified, Hawthorne Unified, Rowland Unified, and Centinela Valley Union High School District (Los Angeles County, 2021).

Discussion

Increases in demand for public services such as fire protection, schools, parks, and libraries are generally created by increases in population. The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions. The Draft 2045 CAP does not propose any changes to the land use

designations or density beyond what is currently allowed under the General Plan. Therefore, adoption of the Draft 2045 would not be anticipated to result in substantially new or increased population growth not already accounted for in the General Plan that could in turn require the construction of new or expanded public services.

While the Draft 2045 CAP itself does not include any project proposals, it would promote the development of projects designed to increase water conservation, energy efficiency, and low-carbon transportation. Many of these projects would involve retrofitting and improving existing buildings and developments. The Draft 2045 CAP includes measures that would encourage green space, which could result in the construction or expansion of parks and open spaces. Some of the projects could involve new construction of water recycling facilities, composting facilities, and solar energy generation facilities as allowed under General Plan land use designations. Projects implementing CAP measures are likely to require construction work crews. However, projects implementing CAP measures are anticipated to have generally short construction periods and construction workers could come from within the existing community. Thereby, substantial population growth inducement is not expected beyond what was accounted for in the General Plan buildout. The location and design of projects intended to implement CAP policies are not known. Individual projects implementing CAP policies would be required to comply with applicable land use plans and regulations designed to ensure adequate public services including those identified above under the regulatory setting. Therefore, impacts from adoption of the Draft 2045 CAP on demand for public services would be less than significant.

References

County of Los Angeles Department of Regional Planning, 2021. Program Environmental Impact Report for the Los Angeles County Housing Element Update. June 2021. URL: https://planning.lacounty.gov/assets/upl/project/Housing_peir.pdf

16. RECREATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Regulatory Setting

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. An increase in the use of existing neighborhood and regional parks or recreational facilities typically would occur as a result of population growth. The Draft 2045 CAP does promote buildout to the higher densities allowed near high quality transit areas and mixed-use development (Measure T1 and T2). However, as described in Section 14, *Population and Housing*, the Draft 2045 CAP would not result in an unanticipated increase in density or population growth outside of what was accounted for in General Plan. Therefore, the Draft 2045 CAP would not result in substantial new unplanned population growth that could in turn result in the increase use of recreational facilities causing the creation or acceleration of substantial physical deterioration of recreational facilities.

The Draft 2045 CAP would promote implementation projects that could include mixed-use developments, solar energy generation facilities, waste management facilities, transit routes, and water recycling facilities. Depending on the location of such implementing projects, construction could have the potential to result in minor disruptions to recreational resources. However, these disruptions are expected to be temporary, would occur at different locations throughout the County, and would not result in a significant disruption of recreational resources in one neighborhood or location such that any increase in use of the facilities would create or accelerate substantial physical deterioration.

The Draft 2045 CAP would not result in population growth outside of densities and growth accounted for in the existing General Plan and 2021-2019 Housing Element. For these reasons, the potential for the Draft 2045 CAP to cause or accelerate substantial physical deterioration would be less than significant., this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

b) Does the project include neighborhood and regional parks or other recreational facilities or require the construction or expansion of such facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. The Draft 2045 CAP includes measures that would encourage green space, which could result in the construction or expansion of parks and open spaces. The Draft 2045 CAP includes Measure A3 which encourages the expansion of green spaces in unincorporated areas of the County. This

measure could promote the construction of new parks or recreational facilities or the expansion of existing green spaces as allowed under current General Plan land use designations. The expansion of existing recreational facilities could require some demolition and minor construction impacts. The construction of new recreational facilities could also result in demolition of existing buildings and minor construction impacts. The creation of new green space could result in environmental impacts; however, in general, the expansion of green spaces is likely to improve environmental conditions by creating more potential habitat improving aesthetics, creating more carbon sequestration opportunities, and creating more infiltration for water runoff. Furthermore, the construction impacts of creating new open space would generally be expected to be short-term and minor. Overall creating additional green space is expected to result in beneficial environmental impacts. Additionally, projects implementing CAP measures would be required to comply with applicable land use plans and policies for recreational facilities including those identified above. Impacts are considered less than significant.

c) Would the project interfere with regional trail connectivity?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. The Draft 2045 CAP promotes the expansion of bicycle and pedestrian networks (Measure T3) and the expansion of green space (Measure A3). These measures are anticipated to promote projects to expand regional trail connectivity that would result in beneficial impacts. Additionally, projects implementing CAP measures would be required to comply with applicable land use plans and policies for recreational facilities including those identified above. Impacts are considered less than significant.

17. TRANSPORTATION

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Conflict with an applicable program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Draft 2045 CAP would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element and no changes to land use designations are proposed as part of the Draft 2045 CAP. The Draft 2045 CAP would be a policy document to provide a community-wide approach to the reduction of GHG emissions from community activities, including future development under the General Plan. While significant impacts are not anticipated, consistency with applicable plans, policies, and regulations related to the circulation system, transit, roadway, bicycle and pedestrian facilities will nonetheless be evaluated further in the EIR.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

The Draft 2045 CAP would provide an approach to the reduction of GHG emissions from community activities, including future development under the General Plan. The potential for GHG reduction measures to result in reductions in vehicles miles traveled (VMT) is anticipated to result in less than significant impacts. Nonetheless, this issue will be further evaluated in the EIR.

c) Substantially increase hazards due to a road design feature (e.g., sharp curves) or incompatible uses (e.g., farm equipment)?

The Draft 2045 CAP would provide an approach to the reduction of GHG emissions from community activities, including future development under the General Plan. While significant impacts are not anticipated, the potential for GHG reduction measures to increase hazards due to a road design feature or incompatible uses will be evaluated further in the EIR.

d) Result in inadequate emergency access?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The 2019 County of Los Angeles All-Hazards Mitigation Plan does not include specific evacuation routes to be used in the event of an emergency (County of Los Angeles 2019). However, the General Plan includes a map of freeway and highway Disaster Routes, many of which cross through portions of the unincorporated County (Los Angeles County 2015). Depending on the nature of projects implementing Draft 2045 CAP measures, they may require construction in major roadways or the closure of major roadways to facilitate construction activities. If construction activities within major roadways or road closures were required to facilitate projects implementing Draft 2045 CAP measures, then activities could obstruct major roadways and could hinder evacuation procedures.

Although the locations and details of potential projects implementing Draft 2045 CAP measures are not known at the time of this analysis, such projects would be subject to individual project review pursuant to the grading or building permit application process. If, based on such review, it is determined that a specific project could conflict with an emergency response or evacuation plan, then a project-specific traffic control plan would be required to avoid such conflicts. Because any potential impacts to the implementation of an emergency response or evacuation plan would be identified and addressed before a related impact could occur, the impacts associated with implementation of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

18. TRIBAL CULTURAL RESOURCES

	<i>Less Than Significant</i>			
<i>Potentially Significant Impact</i>	<i>Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	

a) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <p>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code § 5020.1(k), or</p> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|-------------------------------------|--------------------------|--------------------------|--------------------------|

Los Angeles County is situated on land traditionally occupied by indigenous people associated with five Native American groups: Gabrielino (including the Tongva and Kizh), Tataviam, Serrano, Kitanemuk, and Ventureño Chumash. These groups have rich heritage and deep traditional and cultural values associated with the natural environment and material culture.

Signed into law in September of 2014, Assembly Bill (AB) 52, established “tribal cultural resources” as a new class of resources under CEQA. Tribal cultural resources are defined in PRC 21074 as “site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe.” Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, where one or more California Native American Tribes has requested formal written notification of proposed projects from a lead agency, the lead agency shall provide formal written notification of proposed projects and engage in consultation with requesting tribes as prescribed in the statute.

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element. As a policy document, the Draft 2045 CAP itself would not result in direct impacts to tribal cultural resources.

On October 21, 2019, the County submitted notification and request to consult letters to five (5) individuals and organizations pursuant to AB 52. On October 21, 2019, the County also submitted notification and request to consult letters to twenty-four (24) individuals and organizations pursuant to SB 18. In particular, AB 52 letters were sent via mail to the following California Native American tribes and individuals:

- Andrew Salas, Gabrieleño Band of Mission Indians – Kizh Nation
- Anthony Morales, Gabrieleno Tongva San Gabriel Band of Mission Indians
- Jairo Avila, Fernandeño Tataviam Band of Mission Indians
- Lee Clauss, San Manuel Band of Mission Indians

- Octavio Escobedo, Tejon Indian Tribe

No responses were received from any of the individuals/organizations pursuant to AB 52.

SB 18 letters were sent via mail to the following California Native American tribes and individuals:

- Andrew Salas, Gabrieleño Band of Mission Indians – Kizh Nation
- Anthony Morales, Gabrieleno Tongva San Gabriel Band of Mission Indians
- Charles Alvarez, Gabrielino – Tongva Tribe
- Donna Yocum, San Fernando Band of Mission Indians
- Fred Collins, Northern Chumash Tribal Council
- Gino Altamirano, Coastal Band of the Chumash Nation
- Jairo Avila, Fernandeno Tataviam Band of Mission Indians
- Julie Tumamait-Stenslie, Barbareno/Ventureno Band of Mission Indians
- Julio Quair, Chumash Council of Bakersfield
- Kenneth Kahn, Santa Ynez Band of Chumash Indians
- Lee Clauss, San Manuel Band of Mission Indians
- Gino Altamirano, Coastal Band of the Chumash Nation
- Mark Cochrane, Serrano Nation of Mission Indians
- Mark Vigil, San Luis Obispo County Chumash Council
- Matias Belardes, Juaneno Band of Mission Indians Acjachemen Nation
- Mona Tucker, yak tityu tityu yak tithini-Northern Chumash Tribe
- Robert Dorame, Gabrielino Tongva Indians of California Tribal Council
- Robert L. Gomez, Tubatulabals of Kern Valley
- Robert Martin, Morongo Band of Mission Indians
- Robert Robinson, Kern Valley Indian Community
- Rudy Ortega, Fernandeno Tataviam Band of Mission Indians
- Sandonne Goad, Gabrielino/Tongva Nation
- Sonia Johnston, Juaneno Band of Mission Indians
- Teresa Romero, Juaneno Band of Mission Indians Acjachemen Nation – Romero
- Wayne Walker, Serrano Nation of Mission Indians

A total of five responses were received from the individuals/organizations pursuant to SB 18. The Juaneño Band of Mission Indians Acjachemen Nation-Belardes, Morongo Band of Mission Indians, and the San Manuel Band of Mission Indians indicated they had no concerns regarding the project and did not request consultation. The Santa Ynez Band of Chumash Indians also did not request consultation; however, they indicated that if supplementary literature reveals additional information, or if the scope of work were to change, that they would like to be notified. The Coastal Band of Chumash Indians requested consultation. In response, the County submitted emails on November 21, 2019 and January 8, 2020 to schedule a consultation meeting with the Coastal Band of Chumash Indians, but no response was received. The County also sent a letter via regular mail and email on March 11, 2020 to once again schedule a consultation call with the Coastal Band of the Chumash Nation; however, no response was received.

The AB 52 and SB 18 Native American consultation documentation is provided in Appendix A of this IS.

No tribal cultural resources were identified as a result of consultations that are either listed or eligible for listing in the California Register of Historical Resources (CRHR), or in a local register of historical resources.

Future projects to implement some GHG reduction measures contained in the Draft 2045 CAP would involve structural improvements and/or ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of a tribal cultural resource. Future projects would be required to comply with existing federal, State, and local regulations, and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA, including compliance with AB 52. Such projects could nonetheless result in significant impacts to tribal cultural resources either listed in or eligible for listing in the CRHR or local register and mitigation measures may be needed. Impacts to tribal cultural resources are considered to be potentially significant and will be further evaluated in the EIR.

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2021 Housing Element. As a policy document, the Draft 2045 CAP itself would not result in direct impacts to tribal cultural resources.

As mentioned above, no tribal cultural resources were identified as a result of consultations

Future projects to implement some GHG reduction measures contained in the Draft 2045 CAP would involve structural improvements and/or ground disturbing activities that could, depending on their location, result in direct or indirect adverse changes to the significance of a tribal cultural resource. Future projects would be required to comply with existing federal, State, and local regulations, and undergo the County’s discretionary review process, where applicable, including completion of subsequent project-level planning and environmental review under CEQA, including compliance with AB 52. Such projects could nonetheless result in significant impacts to tribal cultural resources determined by the lead agency in its discretion to be

significant. Impacts to tribal cultural resources are considered to be potentially significant and will be further evaluated in the EIR.

19. UTILITIES AND SERVICE SYSTEMS

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
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Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly result in new or expanded facilities. However, Draft 2045 CAP Strategies could promote the construction of new facilities in order to achieve water conservation and recycling goals, energy efficiency goals, renewable energy goals, and waste diversion goals. Some of the measures may result in retrofitting, plumbing and electrical modifications in existing buildings or the installation of new features such as rooftop solar or water recycling systems (Measure E2, Measure E7, Measure E8, Measure E9, and Measure W3). In general, projects implementing Draft 2045 CAP measures are expected to result in beneficial environmental impacts to utilities by reducing water demand, reducing the demand on water recycling facilities, and reducing the demand for natural gas and electrical power through energy efficiency measures and measure to achieve low-carbon energy use (Measures E1 through E4 and Measure E7).

As described above, the Draft 2045 CAP would result in primarily beneficial impacts with regard to the use of water wastewater treatment, electric power, natural gas, stormwater drainage. The Draft 2045 CAP could promote the construction of new facilities such as new water recycling facilities, EV charging stations, composting facilities, and solar energy generation facilities which have the potential to result in environmental impacts. Development of potential future projects supported by Draft 2045 CAP measures would be evaluated on an individual basis once details are known. No changes to General Plan land use designations are proposed. Therefore, the Draft 2045 CAP would not result in an unanticipated increase in density or population growth outside of what was accounted for in the General Plan that could result in increased demand for utilities. As such, implementing the Draft 2045 CAP would not create new demand related to water, wastewater, stormwater drainage, electric power, natural gas power, or telecommunications utilities. Impacts to this criterion are considered less than significant. Accordingly, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The Draft 2045 CAP includes a number of actions to increase the use of alternate water sources and reduce water consumption. Included within Measure E8 are implementing actions to develop a net zero water ordinance, remove barriers for retrofitting on-site gray water recycling systems, and to partner with LA County

to explore the potential for indirect potable reuse. The performance goals for Measure 8 include the following: 1) 100% of new development is net zero water by 2030; and 2) achieve 80% use of recycled water for agricultural and industrial uses by 2045. Measure E9 which is intended to reduce indoor and outdoor water consumption includes the following performance goals: 1) reduce water consumption by 50% by 2045; 2) adopt a water efficiency ordinance for existing buildings; 3) reduce outdoor landscaping water use by 50% by 2045; and 4) reduce municipal water consumption by 50% by 2045. As demonstrated by the performance metrics, implementation of Measure E8 and E9 would reduce municipal, agricultural, industrial, and outdoor landscaping water use substantially. While the Draft 2045 CAP may promote development that may require water for construction and operation, these developments would be required to comply with the Draft 2045 CAP measures that require net zero water in new development and significant reductions in indoor and outdoor water use for municipal, commercial, and industrial development. Therefore, overall, the strategies and measures proposed in the Draft 2045 CAP would result in reductions in water demand. While the Draft 2045 CAP may result in the development of facilities that would require water for construction and operation, these developments would be required to comply with the adopted Draft 2045 CAP and; therefore, would be required to be net zero water and would not result in additional water demand. Therefore, the Draft 2045 CAP would have a beneficial impact with regard to water supply, impacts would be less than significant this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly result in increased demand on wastewater treatment facilities. Increases in the demand for wastewater treatment is generally associated with an increase in population. As described in Section 14, *Population and Housing*, the Draft 2045 CAP would be consistent with the General Plan and the 2021-2029 Housing Element and would not result in population growth outside of what was accounted for in the General Plan. Therefore, the buildout assumptions that inform the measures in the Draft 2045 CAP would be consistent with the population growth planned for in the General Plan and 2021-2029 Housing Element.

The Draft 2045 CAP would include measures to increase water conservation which could result in a slight decrease in the amount of wastewater required to be treated by wastewater treatment providers. Some measures in the Draft 2045 CAP would promote the development of facilities which could include mixed use development, water recycling facilities, or compost processing facilities (Measure E8, Measure W1, and Measure W3). These facilities could result in an increase in demand for wastewater treatment. Development of potential future projects supported by Draft 2045 CAP measures would be evaluated on an individual basis once details are known. Individual proposals for projects supported by CAP measures would be required to undergo project-level CEQA review and disclose any potential impacts related to wastewater treatment and provide mitigation of any significant impacts, if necessary. Impacts are considered less than significant.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

The Draft 2045 CAP would be a policy document that would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include specific proposed projects that could directly generate solid waste. The Draft 2045 CAP encourages the reduction of solid waste and includes Strategy 9 to reduce GHG emissions associated with solid waste generation. The intent is to increase solid waste diversion in order to reduce the amount of solid waste placed in landfills. Strategy 9 includes Measure W1, which includes implementing actions to increase organic composting in non-residential buildings and within communities. The performance goal for Measure W1 is to reach an organic diversion rate of 95% by 2045. Measure W2 includes implementing actions in order to increase the diversion of recyclable materials. Measure W3 includes implementing measures to incorporate sustainable waste systems and practices with a goal of decreasing per capita waste by 35% by 2045. The implementation of these measures would reduce solid waste generation within the County and impacts would be beneficial. While the Draft 2045 CAP could indirectly promote the construction of facilities in order to meet water recycling, waste diversion, and renewable energy goals which could result in minor amount of waste generated by project construction and operation, these implementing projects would also be required to comply with the waste management measures proposed in the Draft 2045 CAP. Therefore, adoption of the Draft 2045 CAP would not generate substantial solid waste or impair attainment of solid waste reduction goals and impacts would be less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As mentioned above, the adoption of the Draft 2045 CAP would result in beneficial impacts with regard to solid waste management and the diversion of waste from landfills. Any new facilities required to support the measures in the Draft 2045 CAP would be required to comply with existing regulations for solid waste management including the permitting requirements of CalRecycle. Requisite compliance with management and reduction statutes and regulations related to solid waste would ensure that the impacts of the Draft 2045 CAP would be less than significant. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

Although the locations and details of potential projects implementing Draft 2045 CAP measures are not known at the time of this analysis, such projects would be subject to individual project review pursuant to the grading or building permit application process. If, based on such review, it is determined that a specific project could conflict with an emergency response or evacuation plan, then a project-specific traffic control plan would be required to avoid such conflicts. Because any potential impacts to the implementation of an emergency response or evacuation plan would be identified and addressed before a related impact could occur, the impacts associated with implementation of the Draft 2045 CAP would be less than significant. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

LA County is large, and the topography, vegetation and climate vary across the County. Large portions of the undeveloped areas of the County (particularly in the Santa Monica Mountains, Santa Clarita Valley, and Antelope Valley) include the following vegetation types: coastal sage, riparian oak woodlands, and chaparral. Fire risk in LA County is particularly high in the undeveloped areas of the County that are designated as VHFHSZ. These areas typically contain chaparral ecosystems as they contain volatile oils that are particularly flammable. Additionally, chaparral communities are typically located in mountainous areas where the steep terrain can fuel the spread of wildfire (LA County 2021).

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under General Plan land use assumptions with adoption of the 2021-2029 Housing Element. The Draft 2045 CAP does not include any specific projects that could directly expose structures or occupants to wildfire risks. Since no changes to land use designations or specific projects are proposed as part of the Draft 2045 CAP, no new or substantially increased risks associated with wildfires are anticipated.

Projects promoted by the Draft 2045 CAP that could include housing would likely be developed in urban areas which are already developed and not located in undeveloped areas with high fire risk. Some projects implementing Draft 2045 CAP measures such as composting facilities, water recycling facilities, or renewable generation facilities could be located in areas designated as VHFHSZs. Depending on the location and site-specific conditions of implementing projects, such projects could increase the risk of an ignition during construction due to the use of equipment, vehicles, and tools and the storage of fuels and other flammable materials. As described in Section 9, *Hazard and Hazardous Materials*, under criterion g), new development would be required to comply with Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance with the County Fire Code also would ensure developments that are within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. The operation of most facilities that would be promoted by the Draft 2045 CAP would not be expected to substantially increase wildfire risk. Projects also would be required to comply with the California Building Code which identifies building fire safety requirements such as sprinklers, resistance standards, and the clearance of debris and vegetation within a prescribed distance from structures in wildfire hazard areas.

Furthermore, future projects would be required to comply with the General Plan policies, which are intended to reduce the potential for development to be located in high fire hazard areas and encourage mitigation to ensure that developments are built to be fire resistant and have the capacity to ensure proper ingress, egress, and sufficient fire suppression resources onsite:

- Policy S 3.1:** Discourage high density and intensity development in VHFHSZs.
- Policy S 3.2:** Consider climate change implications in planning for FHSZs.
- Policy S 3.3:** Ensure that the mitigation of fire related property damage and loss in FHSZs limits impacts to biological and other resources.
- Policy S 3.4:** Reduce the risk of wildland fire hazards through the use of regulations and performance standards, such as fire-resistant building materials and vegetation.
- Policy S 3.5:** Encourage the use of fire-resistant vegetation that is compatible with the area’s natural vegetative habitats in fuel modification activities.
- Policy S 3.6:** Ensure adequate infrastructure, including ingress, egress, and peak load water supply availability for all projects located in FHSZs.
- Policy S 3.7:** Consider siting and design for developments located within FHSZs, particularly in areas located near ridgelines and on hilltops, to reduce the wildfire risk.
- Policy S 3.8:** Support the retrofitting of existing structures in FHSZs to help reduce the risk of structural and human loss due to wildfire.

Compliance with the LA County Fire Code, California Building Code, and the LA County General Plan would reduce the risk that future projects would be in fire-prone areas and would ensure that developments contain proper fire prevention measures and capacity for fire suppression during construction and operation. While the Draft 2045 CAP itself would not result in any direct impacts to wildfire risk, compliance with these codes and policies would significantly reduce the potential for the Draft 2045 CAP to indirectly result in projects that could expose people to the risks from the spread of wildfire. Requisite compliance with independently enforceable provisions of laws, regulations, plans and standards (including those set forth in the LA County Fire Code, California Building Code, and the General Plan) would assure that the adoption and implementation of the Draft 2045 CAP would result in a less than significant impact relating to the potential exposure of project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Accordingly, this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with

adoption of the 2021-2021 Housing Element. The Draft does not include any specific project proposal and therefore, would not result in any direct increases in wildfire risk that would necessitate the installation of fire prevention infrastructure such as fuel breaks, and emergency water sources. Individual proposals for project supported by Draft 2045 CAP measures would be required to undergo project-level review and disclose any potential impacts related to wildfire risk and provide mitigation of any significant impacts, if necessary. If fuel breaks, emergency water sources, or other fire prevention features are required to reduce wildfire risks, then the environmental impacts of those features would be evaluated as part of the project-level CEQA review. In addition to any project-specific fire-related mitigation recommendations, any new development within Los Angeles County (including the unincorporated areas) would be subject to Title 32 of the Los Angeles County Code (the Los Angeles County Fire Code). Compliance with the County Fire Code would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance with the County Fire Code would also ensure developments that are within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. Further, any project that would result from the adoption of the Draft 2045 CAP would be required to address fire risks before the potential impact could result. Accordingly, this topic will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

As described under criterion b), the portions of the County that are designated as VHFHSZs are characterized by steep slopes that could create the potential for downslope or downstream flooding, landslides, or runoff. Also as described under criterion b), the Draft 2045 CAP would not directly result in any projects that would increase wildfire risk or alter slopes or drainage patterns in a manner that could increase the risk for post fire downslope or downstream flooding or landslides. Projects implementing Draft 2045 CAP measures could, depending on the location and site-specific conditions of projects, increase the risk of wildfire and post-fire flooding or landslides. As described above, all future projects would be required to comply with the County Fire Code, California Building Code, and the General Plan policies which would reduce the extent to which future projects would increase fire risk. Additionally, future projects would be subject to project-level review where site specific fire risk would be evaluated and mitigation, if necessary, would be applied to address significant impacts. Therefore, the potential for future implementing projects to result in the ignition of a fire which could result in downstream flooding or landslides would be less than significant at the project level as well as cumulatively.

Additionally, As discussed in Section 7, *Geology and Soils*, under criterion a.iv), if projects implementing the CAP measures were to be proposed in susceptible areas, significant effects due to the impacts of landslides could result. However, all new developments would be required to comply with the California Building Code and the County Building Code. Requisite compliance with these codes would ensure that each new development would not result in a potential significant impact either at the project level or cumulatively.

Requisite compliance with applicable laws, regulations, and ordinances would assure that new projects implementing Draft 2045 CAP measures would not result in a significant impact. Therefore, this consideration will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

e) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated county wide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2021 Housing Element. The Draft 2045 CAP does not include any specific projects that could directly expose structures or occupants to a significant risk of loss, injury or death involving wildland fires. Since no changes to land use designations or specific projects are proposed as part of the Draft 2045 CAP, no new or substantially increased risks associated with wildfires are anticipated.

Some projects implementing Draft 2045CAP measures such as composting facilities, water recycling facilities, or renewable energy generation facilities could be located in areas designated as VHFHSZs. Depending on the location and site-specific conditions of implementing projects, they could increase the risk of an ignition during project construction due to the use of equipment, vehicles, and tools and the storage of fuels and other flammable materials. As described in Section 9, *Hazard and Hazardous Materials*, under criterion g), and further analyzed above under criterion b), new development would be required to comply with the Los Angeles County Fire Code, the California Building Code, and policies in the General Plan that require that fire prevention measures be incorporated into development and that developments include proper ingress and egress and equipment to respond to fire hazards. Compliance with these requirements would ensure that any new development in the unincorporated County would be in an area with adequate access (for emergency vehicles/personnel) and adequate water and pressure to meet flow standards (in the event that a fire needs to be extinguished). Compliance also would ensure that any future developments that are proposed within mapped VHFHSZs are properly inspected, obtain the applicable permits, and abide by fire prevention techniques. The operation of most facilities that would be promoted by the Draft CAP would not be expected to substantially increase wildfire risk.

For these reasons, any new projects implementing Draft 2045 CAP measures would not result in a significant impact relating to this criterion. Therefore, it will not be analyzed further as part of the CEQA process for the Draft 2045 CAP.

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LACoFD, 2021. LA County Fire Department 2021 Strategic Plan. URL: https://osfm.fire.ca.gov/media/lyulfm3z/2021_lac_fireplan.pdf . June 9, 2021.

California Department of Forestry and Fire Protection (CAL FIRE), 2011. Fire Hazard Severity Zones in Local Responsibility Areas (LRA). Forest Resource Assessment Program. Map. Scale 1:150,000.

Los Angeles County, 2015. Los Angeles County General Plan 2035. Chapter 12, Safety Element. Disaster Routes.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
--	---	--	---	----------------------

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------	--------------------------	--------------------------

As disclosed in Section 4, Biological Resources under criterion a), projects implementing Draft 2045 CAP measures have the potential to result in impacts to candidate, sensitive, or special status species such as Swainson’s hawk and Arroyo toad. Impacts to candidate, sensitive, and special status species are considered to be potentially significant and will be further evaluated in the EIR. Similarly, the potential for the Draft 2045 CAP to result in substantial adverse effects on sensitive natural communities (evaluated in Section 4, Biological Resources under criterion b) is considered to be potentially significant and will be evaluated further in the EIR. Section 4, Biological Resources also identified the potential for projects implementing Draft 2045 CAP measures to impact federally protected wetlands (evaluated in criterion c), interfere with the movement of migratory fish, native resident, or wildlife species (evaluated under criterion d), or convert oak woodlands or other unique native woodlands (evaluated under criterion e) to be potentially significant. Therefore, the potential for the Project to result in impacts to these biological resources will be evaluated further in the EIR.

As analyzed in Section 5, Cultural Resources, the Draft 2045 CAP has the potential to impact historical resources and archaeological resources. As analyzed in Section 13, the Draft 2045 CAP has the potential to impact tribal cultural resources. Therefore, potential impacts related to cultural resources and tribal cultural resources will be evaluated further in the EIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------	--------------------------	--------------------------

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with adoption of the 2021-2029 Housing Element. According to CEQA Guidelines Section 15130(e), if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further

analyze that cumulative impact. Potential cumulative impacts would result if the Draft 2045 CAP promotes growth in the County in excess of what was accounted for in the General Plan and the 2021-2029 Housing Element. The potential for cumulative effects will be considered in the EIR.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

The Draft 2045 CAP would be a policy document intended to reduce unincorporated countywide GHG emissions and would support development already allowed under the General Plan land use assumptions with the 2021-2029 Housing Element. The Draft 2045 CAP does not include any specific projects that could directly result in adverse effects on human beings. However, projects implementing Draft 2045 CAP measures could result in potentially significant impacts as disclosed throughout this Initial Study. Therefore, the potential for Air Quality, Noise, and Transportation and other potentially significant impacts to result in a potentially significant impact to human beings will be evaluated further in an EIR.

APPENDIX A

Tribal Consultation

Appendix A.3

Newspaper Notifications

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PROOF OF PUBLICATION

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 } SS
COUNTY OF LOS ANGELES }

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the assistant principal clerk of the printer of the Acton Agua Dulce News, (Acton Agua Dulce Weekly News) a newspaper of general circulation, printed and published weekly in the Community of Acton, county of Los Angeles, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under date of February 8, 1989, Case Number 9391; that the notice, of which the annexed is a printed copy has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

Dec. 30, 2021

in the year *2021*

I certify (or declare) under penalty of perjury that the foregoing is true and correct

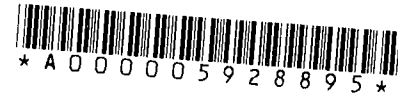
M. Gayle Joyce
Supervisor

5/12-30-2021
ryg

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME:

Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION : Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS : The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is re-

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I am a resident of Los Angeles County, over the age of eighteen years and not a party to any or interested in the matter noticed.

The notice, of which the annexed is a printed copy appeared in the:

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On the following dates:

December 30, 2021

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Los Angeles, California, this

3rd day of January 2022



Signature
Debbie Yerkes

3541828

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING

PROJECT NAME :
Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP)

PROJECT LOCATION : Unincorporated areas of Los Angeles County

The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS : The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: Air Quality Biological Resources Cultural Resources Noise Tribal Cultural Resources PUBLIC REVIEW PERIOD : The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence. Please send written comments to the following address: Thuy Hua, Supervising Regional Planner Los Angeles County Department of Regional Planning 320 West Temple Street, 13th Floor Los Angeles, CA 90012 For email submittal of your comment letter, send to: climate@planning.lacounty.gov Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the PEIR. All written comment letters/emails will be included in an appendix in the Draft PEIR and the contents considered in the preparation of the PEIR. DOCUMENT AVAILABILITY AND PROJECT WEBSITE : This Notice of Preparation and the Initial Study are available for view online at: <https://planning.lacounty.gov/climate>. NOTICE OF PUBLIC SCOPING MEETING: The County will conduct a public scoping meeting to solicit oral and written comments from interested parties on the scope and content of the PEIR. All interested parties are invited to attend the scoping meeting to assist in identifying issues to be addressed in the PEIR. The scoping meeting will include a brief presentation of the project scope to be addressed in the PEIR, a summary of the PEIR process, and will provide attendees with an opportunity to provide input to the scope and content of the PEIR. The scoping meeting will be held online via Zoom on January 13, 2022 at 5:00 p.m. PST. Please visit <https://planning.lacounty.gov/site/climate/meetings-hearings/> to register for the meeting.
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I am a citizen of the United States; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principle clerk of the printer of Gardena Valley News, a newspaper of general circulation, published ONCE WEEKLY in the city of Gardena, County of LOS ANGELES, which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of LOS ANGELES, State of California under the date of November 13, 1958, Case Number 192381; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

December 30, 2021

That said newspaper was regularly issued and circulated on those dates.

SIGNED:

Gardena Valley News

Subscribed to and sworn by me this 30th day of December 2021.

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NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME: Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION : Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS : The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: Air Quality Biological Resources Cultural Resources Noise Tribal Cultural Resources PUBLIC REVIEW PERIOD : The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence. Please send written comments to the following address: Thuy Hua, Supervising Regional Planner Los Angeles County Department of Regional Planning 320 West Temple Street, 13th Floor Los Angeles, CA 90012 For email submittal of your comment letter, send to: climate@planning.lacounty.gov Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the PEIR. All written comment letters/emails will be included in an appendix in the Draft PEIR and the contents considered in the preparation of the PEIR. DOCUMENT AVAILABILITY AND PROJECT WEBSITE : This Notice of Preparation and the Initial Study are available for view online at: <https://planning.lacounty.gov/climate>. NOTICE OF PUBLIC SCOPING MEETING: The County will conduct a public scoping meeting to solicit oral and written comments from interested parties on the scope and content of the PEIR. All interested parties are invited to attend the scoping meeting to assist in identifying issues to be addressed in the PEIR. The scoping meeting will include a brief presentation of the project scope to be addressed in the PEIR, a summary of the PEIR process, and will provide attendees with an opportunity to provide input to the scope and content of the PEIR. The scoping meeting will be held online via Zoom on January 13, 2022 at 5:00 p.m. PST . Please visit <https://planning.lacounty.gov/site/climate/meetings-hearings/> to register for the

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DECLARATION

I am a resident of Los Angeles County, over the age of eighteen years and not a party to any or interested in the matter noticed.

The notice, of which the annexed is a printed copy appeared in the:

GLENDALE INDEPENDENT

On the following dates:

December 30, 2021

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Los Angeles, California, this

10th day of January 2022

Handwritten signature of Debbie Yerkes

Signature
Debbie Yerkes

3541830

"The only Public Notice which is justifiable from the standpoint of true economy and the public interest, is that which r...



NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME: Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP); PROJECT LOCATION: Unincorporated areas of Los Angeles County; The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected landowners, businesses, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION: The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning (DRP) released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving numerous comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2015, 2020, 2025, and 2045; new GHG emissions targets for 2025, 2035, and 2045; a revised suite of GHG reduction strategies; and others. In response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a clarification of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance by using the CAP per CEQA Guidelines, Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS: The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: AIR QUALITY; Biological Resources; Cultural Resources; Noise; Initial Cultural Resources; PUBLIC REVIEW PERIOD: The County invites interested parties to provide written comments on the Draft 2045 CAP. Comments about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence. Please send written comments to the following address: Tudy Hui, Supervising Regional Planner, Los Angeles County, Department of Regional Planning, 350 West Temple Street, 11th Floor, Los Angeles, CA 90012. For email submittal of your comment letter, send to: climate@planning.lacounty.gov. Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of those topics in the PEIR. All written comment statements will be included in an appendix to the Draft PEIR and the contents considered in the preparation of the PEIR. DOCUMENT AVAILABILITY AND PROJECT WEBSITE: This Notice of Preparation and the Initial Study are available for view online at: https://planning.lacounty.gov/climate/. NOTICE OF PUBLIC SCOPING MEETING: The County will conduct a public scoping meeting to solicit oral and written comments from interested parties on the scope and content of the PEIR. All interested parties are invited to attend this scoping meeting to assist in identifying issues to be addressed in the PEIR. The scoping meeting will include a brief presentation of the project scope to be addressed in the PEIR, a summary of the PEIR process, and will provide attendees with an opportunity to provide input to the scope and content of the PEIR. The scoping meeting will be held online via Zoom on January 13, 2022 at 5:00 p.m. PST. Please visit https://planning.lacounty.gov/submitting-comments-meetings-hearings/ to register for the meeting. 12/30/21 CAS-3541830 GLENDALE INDEPENDENT

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Type	Order No	Description	Amount
Invoice	B3541831	LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN (DRAFT 2045 GPN GOVT PUBLIC NOTICE 36000 LA OPINION 12/29/2021	1,318.09
		ONLINE CHARGE	0.59
		\$ 54.41 * 1 Cols * 24.214285 Inches * 1 Inserts	1,317.50
		85% Discount :	1,120.38
		Commission :	197.71

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PROOF OF PUBLICATION
(2015.5C.C.P)



PO Box 71847, Los Angeles, CA 90071
Tel: (213)896-2260 • Fax: (213)896-2260

STATE OF CALIFORNIA

I am a citizen of the United States and a resident of the county aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of La Opinión a newspaper of general circulation, printed and published daily in the city of Los Angeles, county of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of July 28, 1969, Case Number: 950176; that the notice, of which the annexed is a printed copy, has been published in each regular and not in any supplement thereof on the following dates, to wit:

December 29

all in the year 2021

I certified (or declared) under penalty of perjury that the foregoing is true and correct.

Dated at Los Angeles, California, this

29 day of December, 2021

Rosa Berumen

Signature

AVD #017 Controlled
Rev. 03/12



* A 0 0 0 0 5 9 1 4 8 1 5 *

This space is for

Proof of publicat

AVISO DE PREPARACIÓN DE UN BORRADOR DE PROGRAMA DE INFORME DE IMPACTO AMBIENTAL Y REUNIÓN DEL ALCANCE PÚBLICO
NOMBRE DEL PROYECTO: Plan de Acción Climática de 2045 (Borrador 2045 CAP) del Condado de Los Angeles
UBICACIÓN DEL PROYECTO: Areas no incorporadas del Condado de Los Angeles
El Condado de Los Angeles (Condado) es la Agencia Líder de conformidad con la Ley de Calidad Ambiental de California (CEQA, por sus siglas en inglés) y sus regulaciones de implementación, las Directrices de CEQA. El Condado tiene la intención de preparar un Programa de Informe de Impacto Ambiental (PEIR, por sus siglas en inglés) para el Plan de Acción Climática de 2045 (CAP) que sería un componente de implementación del Elemento de Calidad del Aire del Plan General del Condado de Los Angeles. El Condado ha preparado este Aviso de Preparación para proporcionar a las Agencias Responsables, Agencias Fiduciarias,

agencias federales, estatales y locales, y organizaciones, y otras partes interesadas con información correspondiente a este proyecto y sus efectos ambientales potenciales, y solicitar su opinión sobre el alcance y contenido del PEIR.
DESCRIPCIÓN DEL PROYECTO: El Borrador 2045 CAP requerirá una Enmienda al Plan General para reemplazar el Plan de Acción Climática de la Comunidad del Condado de Los Angeles (2020 .CCAP), que es un componente de implementación del Elemento de Calidad del Aire del Plan General del Condado de Los Angeles. A principios de 2020, el Departamento de Planificación Regional ("DRP", por sus siglas en inglés) publicó un Borrador de Debate Público del Anteproyecto 2045 CAP (Borrador de Debate Público). Después de recibir comentarios importantes de las partes interesadas, DRP determinó la necesidad de revisar y actualizar sustancialmente el Borrador de Debate Público. Las revisiones incluirán un inventario de emisiones GHG para 2018; nuevas pronósticos de emisiones para 2030, 2035, y 2045; nuevos objetivos de emisiones GHG para 2030, 2035, y 2045; una serie revisada de estrategias, medidas y acciones de reducción de GHG en respuesta a los comentarios públicos para que sea más claro, específico, factible, y cuantificable; un apéndice de modelado técnico para explicar los estimados de reducción de GHG del Borrador 2045 CAP; una consideración de las preocupaciones de justicia y equidad; y una nueva lista de verificación de consistencia de revisión de desarrollo para permitir que los proyectos optimicen el cumplimiento de CEQA para el uso del CAP, según la Sección 15183.5 de las Directrices de CEQA.
POSIBLES EFECTOS AMBIENTALES: El Condado ha preparado un Estudio Inicial que está siendo distribuido con este Aviso de Preparación. Debido a que el Estudio Inicial indica que el proyecto propuesto puede tener un impacto significativo en el medio ambiente, el Condado ha determinado que se requiere la preparación de un PEIR. El PEIR se enfocará en los efectos potencialmente significativos del proyecto, discutir brevemente cualquier efecto que se considere no significativo. El PEIR incluirá una evaluación más detallada de los siguientes problemas ambientales: Calidad del Aire, Recursos Biológicos, Recursos Culturales, Recursos Culturales Tribales.
PERIODO DE REVISIÓN PÚBLICA: El Condado invita a las partes interesadas a proporcionar comentarios por escrito en cuanto a sus preocupaciones específicas acerca de los posibles efectos potenciales del proyecto. El Condado solicita que cualquier Agencia Responsable o Fiduciaria que responda a este aviso lo haga de manera consistente con la Sección 15082(b) de las Directrices Estatales de CEQA. Un periodo de revisión de 30 días comienza el 3 de enero de 2022, y finaliza el 1 de febrero de 2022. Debido a los límites de tiempo exigidos por la ley estatal, por favor envíe su respuesta por escrito o al correo electrónico lo antes posible, antes del 1 de febrero de 2022 a las 5:00 p.m. Por favor incluya su nombre y dirección para toda la correspondencia escrita. Envíe sus comentarios por escrito a la siguiente dirección: Thuy Hua, Supervisor de Planificación Regional, Departamento de Planificación Regional del Condado de Los Angeles, 320 West Temple Street, 13vo. Piso, Los Angeles, CA 90012. Para enviar una carta de comentarios por correo electrónico, envíela a: climate@planning.lacounty.gov. Cualquier comentario proporcionado debe identificar los temas específicos de preocupación ambiental y su razón para sugerir el estudio de estos temas en el PEIR. Todos las cartas de comentarios escritos/correo electrónico serán incluidos en un apéndice en el Borrador PEIR y los contenidos considerados en la preparación del PEIR.
DOCUMENTO DE DISPONIBILIDAD Y SITIO WEB DEL PROYECTO: Este Aviso de Preparación y el Estudio Inicial están disponibles para verse en línea en: https://planning.lacounty.gov/climate.
AVISO DE REUNIÓN DE ALCANCE PÚBLICO: El Condado llevará a cabo una reunión de alcance público para solicitar comentarios orales y escritos de las partes interesadas en el alcance y contenido del PEIR. Todas las partes interesadas están invitadas a asistir a la reunión de alcance para ayudar en identificar los problemas a ser abordados en el PEIR. La reunión de alcance incluirá una breve presentación del alcance del proyecto a ser abordado en el PEIR, un resumen del proceso del PEIR, y proporcionará a los asistentes una oportunidad de brindar información al alcance y contenido del PEIR. La reunión de alcance se llevará a cabo en línea a través de Zoom el 13 de enero de 2022 a las 5:00 p.m. PST. Por favor visite https://planning.lacounty.gov/site/climate/meetings-hearings/ para registrarse en la reunión. 12/29/21
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Invoice	B3541832	LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN (DRAFT 2045 GPN GOVT PUBLIC NOTICE 40180 LOS ANGELES SENTINEL 12/30/2021	761.83
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		Commission : 114.27	

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Please make check payable to: Daily Journal Corporation

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3800 S CRENSHAW BLVD, LOS ANGELES, CA 90008
Telephone (323) 299-3800 / Fax (323) 299-3896

Thuy Hua
L.A. CO REGIONAL PLANNING
320 W TEMPLE ST, RM 1383
LOS ANGELES, CA - 90012

CNS#: 3541832

PROOF OF PUBLICATION

(2015.5 C.C.P.)

State of California)
County of LOS ANGELES) ss

Notice Type: GPN - GOVT PUBLIC NOTICE

Ad Description:
Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP)

I am a citizen of the United States and a resident of the State of California; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer and publisher of the LOS ANGELES SENTINEL, a newspaper published in the English language in the city of LOS ANGELES, and adjudged a newspaper of general circulation as defined by the laws of the State of California by the Superior Court of the County of LOS ANGELES, State of California, under date of 08/25/1938, Case No. 430764. That the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

12/30/2021

Executed on: 12/30/2021
At Los Angeles, California

I certify (or declare) under penalty of perjury that the foregoing is true and correct.



Signature



NOTICE OF PREPARATION
OF A DRAFT PROGRAM
ENVIRONMENTAL IMPACT
REPORT AND PUBLIC
SCOPING MEETING
PROJECT NAME :

Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION : Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR.

PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public

comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL

EFFECTS : The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues:

Air Quality Biological Resources Cultural Resources Noise Tribal Cultural Resources PUBLIC REVIEW PERIOD : The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence. Please send written comments to the following address: Thuy Hua, Supervising Regional Planner

Los Angeles County
Department of Regional
Planning 320 West Temple
Street, 13th Floor Los
Angeles, CA 90012 For email
submittal of your comment
letter, send to:
climate@planning.lacounty.g
ov Any comments provided
should identify specific topics
of environmental concern and
your reason for suggesting
the study of these topics in
the PEIR. All written
comment letters/emails will
be included in an appendix in
the Draft PEIR and the
contents considered in the
preparation of the PEIR.
DOCUMENT AVAILABILITY
AND PROJECT WEBSITE :
This Notice of Preparation
and the Initial Study are
available for view online at:
[https://planning.lacounty.gov/
climate](https://planning.lacounty.gov/climate). NOTICE OF PUBLIC
SCOPING MEETING: The
County will conduct a public
scoping meeting to solicit oral
and written comments from
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13, 2022 at 5:00 p.m. PST .
Please visit
[https://planning.lacounty.gov/
site/climate/meetings-
hearings/](https://planning.lacounty.gov/site/climate/meetings-hearings/) to register for the
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Invoice	B3541833	LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN (DRAFT 2045 GPN GOVT PUBLIC NOTICE 41095 MALIBU TIMES 12/30/2021	269.79
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		85% Discount : 229.32	
		Commission : 40.47	

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THE MALIBU TIMES

24955 Pacific Coast Hwy #A 102
Malibu, California 90265
(310) 456-5507

PROOF OF PUBLICATION (20155 C.C.P.)

STATE OF CALIFORNIA,
COUNTY OF LOS ANGELES,

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of the

The Malibu Times

a newspaper of general circulation, printed and published Every Thursday

in the City of Malibu County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the

date of December 1, 19 88

Case Number C704330; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

12/30

all in the year 20 21.
I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Malibu

California, this 30 day of DEC, 20 21

Serese Gelbman

Signature



This space is for the County Clerk's Filing Stamp

Proof of Publication of

#3541833 GPN

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME:

Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION: Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION: The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS: The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues:

Air Quality Biological Resources Cultural Resources Noise Tribal Cultural Resources PUBLIC REVIEW PERIOD: The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your

Case Number C704330; that the notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to-wit:

12/30

all in the year 20 21
I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Malibu

California, this 30 day of DEC, 20 21

Sereser Gelbman
Signature

implementing component of the Air Quality... General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS: The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues:

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be held online via Zoom on January 13, 2022 at 5:00 p.m. PST. Please visit https://planning.lacounty.gov/site/climate/meetings-hearings/ to register for the meeting, 12/30/21
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Invoice	B3541834	LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN (DRAFT 2045 GPN GOVT PUBLIC NOTICE 70540 PASADENA STAR NEWS 12/30/2021	571.38
		ONLINE CHARGE	23.53
		\$ 17.50 * 2 Cols * 15.6528 Inches * 1 Inserts	547.85
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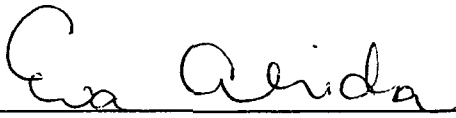
STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States, and a resident of the county aforesaid. I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of PASADENA STAR-NEWS, a newspaper of general circulation for the City of Pasadena, by the Superior Court of the County of Los Angeles, State of California, on the date of June 22, 1927, Case Number 225647. The notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

12/30/2021

I declare under the penalty of perjury that the foregoing is true and correct.

Executed at Monrovia, LA Co. California
On this 12th day of January, 2022.


Signature



Legal No. 0011509205

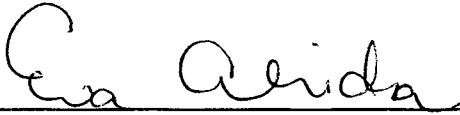
NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME : Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION : Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning (DRP) released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS : The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: Air Quality Biological Resources Cultural Resources Noise Tribal Cultural Resources PUBLIC REVIEW PERIOD : The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence. Please send written comments to the following address: Thuy Hua, Supervising Regional Planner Los Angeles County Department of Regional Planning 320 West Temple Street, 13th Floor Los Angeles, CA 90012 For email submission of your comment letter, send to: climate@planning.lacounty.gov Any comments provided should identify specific topics of environmental concern and your

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12/30/2021

I declare under the penalty of perjury that the foregoing is true and correct.

Executed at Monrovia, LA Co. California
On this 12th day of January, 2022.



Signature

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Invoice	B3541835	LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN (DRAFT 2045 GPN GOVT PUBLIC NOTICE 63280 SAN GABRIEL VALLEY TRIBUNE 12/29/2021	571.28
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**PROOF OF PUBLICATION
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**STATE OF CALIFORNIA
County of Los Angeles**

I am a citizen of the United States, and a resident of the county aforesaid. I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of SAN GABRIEL VALLEY TRIBUNE, a newspaper of general circulation for the City of West Covina, by the Superior Court of the County of Los Angeles, State of California, on the date of September 10, 1957, Case Number 684891. The notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

12/29/2021

I declare under the penalty of perjury that the foregoing is true and correct.

Executed at Monrovia, LA Co. California
On this 2nd day of February, 2022.

Isabella Almeida

Signature



Legal No. **0011509207**

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME: Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION: Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION: The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS: The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: Air Quality Biological Resources Cultural Resources Noise Tribal

Cultural Resources PUBLIC
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Guidelines. A 30-day review period
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please send your written response
to the address or email below at the
earliest possible date, but no later
than February 1, 2022, at 5:00 p.m.
Please include your name and
address for all written
correspondence. Please send
written comments to the following
address: Thuy Hua, Supervising
Regional Planner, Los Angeles
County Department of Regional
Planning, 320 West Temple Street,
13th Floor, Los Angeles, CA 90012
For email submittal of your
comment letter, send to:
climate@planning.lacounty.gov
Any comments provided should
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written comment letters/emails will
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Draft PEIR and the contents
considered in the preparation of the
PEIR.

DOCUMENT
AVAILABILITY AND PROJECT
WEBSITE : This Notice of
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to NOTICE OF PUBLIC SCOPING
MEETING: The County will
conduct a public scoping meeting to
solicit oral and written comments
from interested parties on the scope
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<https://planning.lacounty.gov/site/climate/meetings-hearings/>
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Invoice	B3541836	LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN (DRAFT 2045 GPN GOVT PUBLIC NOTICE 73400 THE ARGONAUT 12/30/2021	278.85
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Proof of Publication

(2015.5 C.C.P.)

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of the Argonaut, a newspaper of general circulation, printed and published weekly in the City of Argonaut, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of February 19, 1988, modified October 5, 1976, Case Number C47170; that the notice, of which the annexed is a printed copy (set in type no smaller than nonpareil), has published in each regular and entire issue of said newspaper and not been in any supplement thereof on the following dates; to wit:

December 30, 2021

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Argonaut, California

This 30th day of December 2021



Ann Turrietta, Legal Clerk, Los Angeles County, California

00004882 00043655

Curtis Small
CNSB(Calif. Newspaper Service Bur.)
P.O. Box 60460
Los Angeles, CA 90060



NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME: Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION : Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS : The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: Air Quality Biological Resources Cultural Resources Noise Tribal Cultural Resources PUBLIC REVIEW PERIOD : The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency, responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence. Please send written comments to the following address: Thuy Hua, Supervising Regional Planner Los Angeles County Department of Regional Planning 320 West Temple Street, 13th Floor Los Angeles, CA 90012 For email submittal of your comment letter, send to: climate@planning.lacounty.gov Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the PEIR. All written comment letters/emails will be included in an appendix in the Draft PEIR and the contents considered in the preparation of the PEIR. DOCUMENT AVAILABILITY AND PROJECT WEBSITE : This Notice of Preparation and the Initial Study are available for view online at: https://planning.lacounty.gov/climate/ NOTICE OF PUBLIC SCOPING MEETING: The County will conduct a public scoping meeting to solicit oral and written comments from interested parties on the scope and content of the PEIR. All interested parties are invited to attend the scoping meeting to assist in identifying issues to be addressed in the PEIR. The scoping meeting will include a brief presentation of the project scope to be addressed in the PEIR, a summary of the PEIR process, and will provide attendees with an opportunity to provide input to the scope and content of the PEIR. The scoping meeting will be held online via Zoom on January 13, 2022 at 5:00 p.m. PST. Please visit https://planning.lacounty.gov/site/climate/meetings-hearings/ to register for the

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		\$ 20.61 * 15.555 Inch * 1 Ins * 2 Cols	641.16
		ONLINE POSTING FEE	23.53
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LOS ANGELES, CA 90060

FILE NO. 3541837
PROOF OF PUBLICATION
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of THE DAILY BREEZE, a newspaper of general circulation, printed and published in the City of Torrance*, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of County of Los Angeles, State of California, under the date of June 10, 1974, Case Number SWC7146. The notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

12/30/2021

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Torrance, California
On this 30th day of December, 2021.

Pauline Fernandez

Signature

*The Daily Breeze circulation includes the following cities: Carson, Compton, Culver City, El Segundo, Gardena, Harbor City, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Long Beach, Manhattan Beach, Palos Verdes Peninsula, Palos Verdes, Rancho Palos Verdes, Rancho Palos Verdes Estates, Redondo Beach, San Pedro, Santa Monica, Torrance and Wilmington.

Legal No. **0011509814**

NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME : Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION : Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS : The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: Air Quality Biological Resources Cultural Resources Noise Tribal



Cultural Resources PUBLIC
REVIEW PERIOD : The County
invites interested parties to provide
written comments as to your
specific concerns about the project's
potential environmental effects.
The County requests that any
Responsible or Trustee Agency
responding to this notice do so in a
manner consistent with Section
15082(b) of the State CEQA
Guidelines. A 30-day review period
starts on January 3, 2022, and ends
on February 1, 2022. Due to the time
limits mandated by state law,
please send your written response
to the address or email below at the
earliest possible date, but no later
than February 1, 2022, at 5:00 p.m.
Please include your name and
address for all written
correspondence. Please send
written comments to the following
address: Thuy Hua, Supervising
Regional Planner Los Angeles
County Department of Regional
Planning 320 West Temple Street,
13th Floor Los Angeles, CA 90012
For email submittal of your
comment letter, send to:
climate@planning.lacounty.gov
Any comments provided should
identify specific topics of
environmental concern and your
reason for suggesting the study of
these topics in the PEIR. All
written comment letters/emails will
be included in an appendix in the
Draft PEIR and the contents
considered in the preparation of the
PEIR. DOCUMENT
AVAILABILITY AND PROJECT
WEBSITE : This Notice of
Preparation and the Initial Study
are available for view online at:
<https://planning.lacounty.gov/climate>
te. NOTICE OF PUBLIC SCOPING
MEETING: The County will
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from interested parties on the scope
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will include a brief presentation of
the project scope to be addressed in
the PEIR, a summary of the PEIR
process, and will provide attendees
with an opportunity to provide input
to the scope and content of the
PEIR. The scoping meeting will be
held online via Zoom on January 13,
2022 at 5:00 p.m. PST . Please visit
<https://planning.lacounty.gov/site/climate/meetings-hearings/> to
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12/30/21
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		<i>AFFIDAVIT CHARGE</i>	10.00
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THE SIGNAL
25060 Avenue Stanford #141
Valencia, CA 91355

Proof of Publication
(2015.5 C.C.P.)

STATE OF CALIFORNIA
County of Los Angeles

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years and not a party to or interested in the action for which the attached notice was published. I am a principal clerk of THE SIGNAL, which was adjudged a newspaper of general circulation on March 25, 1988 (Case number NVC 15880) for the City of Santa Clarita and State of California. Attached to this Affidavit is a true and complete copy as was printed and published on the following date(s):

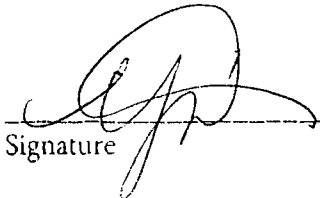
12/29

All in the year 20 21

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Santa Clarita, California, this

29th day of December 20 21


Signature



NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME :

Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP). PROJECT LOCATION : Unincorporated areas of Los Angeles County. The County of Los Angeles (County) is the Lead Agency pursuant to the

California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA

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Invoice	B3541839	LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN (DRAFT 2045 GPN GOVT PUBLIC NOTICE 77140 WHITTIER DAILY NEWS 12/30/2021	571.38
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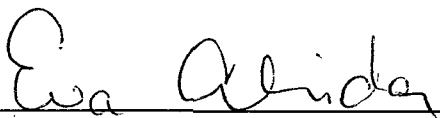
**STATE OF CALIFORNIA
County of Los Angeles**

I am a citizen of the United States, and a resident of the county aforesaid. I am over the age of eighteen years and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of WHITTIER DAILY NEWS, a newspaper of general circulation for the City of Whittier, by the Superior Court of the County of Los Angeles, State of California, on the date of October 10, 1960, Case Number 369393. The notice, of which the annexed is a true printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

12/30/2021

I declare under the penalty of perjury that the foregoing is true and correct.

Executed at Monrovia, LA Co. California
On this 12th day of January, 2022.



Signature



NOTICE OF PREPARATION OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT AND PUBLIC SCOPING MEETING PROJECT NAME : Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) PROJECT LOCATION : Unincorporated areas of Los Angeles County The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR. PROJECT DESCRIPTION : The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. ENVIRONMENTAL EFFECTS : The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: Air Quality Biological Resources Cultural Resources Noise Tribal Cultural Resources PUBLIC REVIEW PERIOD : The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence. Please send written comments to the following address: Thuy Huo, Supervising Regional Planner Los Angeles County Department of Regional Planning 320 West Temple Street, 13th Floor Los Angeles, CA 90012 For email submittal of your comment letter, send to: climate@planning.lacounty.gov Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of

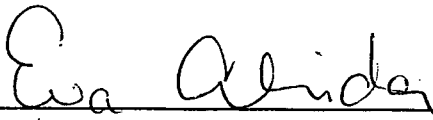
County of Los Angeles

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12/30/2021

I declare under the penalty of perjury that the foregoing is true and correct.

Executed at Monrovia, LA Co. California
On this 12th day of January, 2022.



Signature

rLP15-05/17/17

1

Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5. POTENTIAL ENVIRONMENTAL EFFECTS: The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues: Air Quality Biological Resources Cultural Resources Noise Tribal Cultural Resources PUBLIC REVIEW PERIOD: The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines. A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence. Please send written comments to the following address: Thuy Hua, Supervising Regional Planner Los Angeles County Department of Regional Planning 320 West Temple Street, 13th Floor Los Angeles, CA 90012 For email submission of your comment letter, send to: climate@planning.lacounty.gov Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the PEIR. All written comment letters/emails will be included in an appendix in the Draft PEIR and the contents considered in the preparation of the PEIR. DOCUMENT AVAILABILITY AND PROJECT WEBSITE: This Notice of Preparation and the Initial Study are available for view online at: <https://planning.lacounty.gov/climate>. NOTICE OF PUBLIC SCOPING MEETING: The County will conduct a public scoping meeting to solicit oral and written comments from interested parties on the scope and content of the PEIR. All interested parties are invited to attend the scoping meeting to assist in identifying issues to be addressed in the PEIR. The scoping meeting will include a brief presentation of the project scope to be addressed in the PEIR, a summary of the PEIR process, and will provide attendees with an opportunity to provide input to the scope and content of the PEIR. The scoping meeting will be held online via Zoom on January 13, 2022 at 5:00 p.m. PST. Please visit: <https://planning.lacounty.gov/site/climate/meetings-hearings/> to register for the meetings.
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Reference No	Description	Customer Ref No
210241	Climate Action Plan (Draft 2045 CAP)	

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PROOF OF PUBLICATION
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STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I am a citizen of the United States and resident of the State of California. I am over the age of eighteen years, and not party or interested in the above-entitled matter. I am the principal clerk of the publisher of:

The Acorn Newspapers
30423 Canwood Street, Suite 108
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A newspaper of general circulation, printed and published weekly in the City of Agoura, Malibu Judicial District, County of Los Angeles, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of April 6, 2000, Case Number BS061493. That the notice of which the Annexed is a printed copy has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates to-wit:

December 30,

in the year of 2021.

I certify or declare under penalty of perjury that the foregoing is true and correct.

Dated at Agoura Hills, California

this 30th day of December 2021.

Sincerely,



Laura Rosas
Legal Advertising

COUNTY CLERK FILING STAMP

PROOF OF PUBLICATION

NOTICE OF PREPARATION

Climate Action Plan (Draft 2045 CAP)

**NOTICE OF PREPARATION
OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT
REPORT**

AND PUBLIC SCOPING MEETING

PROJECT NAME: Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP)

PROJECT LOCATION: Unincorporated areas of Los Angeles County

The County of Los Angeles (County) is the Lead Agency pursuant to the California Environmental Quality Act (CEQA) and its implementing regulations, the CEQA Guidelines. The County intends to prepare a Program Environmental Impact Report (PEIR) for the 2045 Climate Action Plan (CAP) that would be an implementing component of the Air Quality Element of the Los Angeles County General Plan. The County has prepared this Notice of Preparation to provide Responsible Agencies, Trustee Agencies, potentially affected federal agencies, organizations, and other interested parties with information regarding this project and its potential environmental effects, and to solicit your input on the scope and content of the PEIR.

PROJECT DESCRIPTION: The Draft 2045 CAP would require a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (2020 CCAP), which is an implementing component of the Air Quality Element of the Los Angeles County General Plan. In early 2020, the Department of Regional Planning ("DRP") released a Public Discussion Draft of the Draft 2045 CAP (Public Discussion Draft). After receiving significant comments from stakeholders, DRP determined the need to substantially revise and update the Public Discussion Draft. Revisions will include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions in response to public comments to be more clear, specific, feasible, and quantifiable; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP, per CEQA Guidelines Section 15183.5.

POTENTIAL ENVIRONMENTAL EFFECTS: The County has prepared an Initial Study, which is being circulated with this Notice of Preparation. Because the Initial Study indicates that the proposed project may have a significant impact to the environment in one or more resource areas, the County has determined that preparation of a PEIR is required. The PEIR will focus on the potentially significant effects of the project, and briefly discuss any effects found not to be significant. The PEIR will include a more detailed evaluation of the following environmental issues:

- Air Quality
- Biological Resources
- Cultural Resources
- Noise
- Tribal Cultural Resources

PUBLIC REVIEW PERIOD: The County invites interested parties to provide written comments as to your specific concerns about the project's potential environmental effects. The County requests that any Responsible or Trustee Agency responding to this notice do so in a manner consistent with Section 15082(b) of the State CEQA Guidelines.

A 30-day review period starts on January 3, 2022, and ends on February 1, 2022. Due to the time limits mandated by state law, please send your written response to the address or email below at the earliest possible date, but no later than February 1, 2022, at 5:00 p.m. Please include your name and address for all written correspondence.

Please send written comments to the following address:

Thuy Hua, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

For email submittal of your comment letter, send to: climate@planning.lacounty.gov

Any comments provided should identify specific topics of environmental concern and your reason for suggesting the study of these topics in the PEIR. All written comment letters/ emails will be included in an appendix in the Draft PEIR and the contents considered in the preparation of the PEIR.

DOCUMENT AVAILABILITY AND PROJECT WEBSITE: This Notice of Preparation and the Initial Study are available for view online at: <https://planning.lacounty.gov/climate>.

NOTICE OF PUBLIC SCOPING MEETING: The County will conduct a public scoping meeting to solicit oral and written comments from interested parties on the scope and content of the PEIR. All interested parties are invited to attend the scoping meeting to assist in identifying issues to be addressed in the PEIR.

The scoping meeting will include a brief presentation of the project scope to be addressed in the PEIR, a summary of the PEIR process, and will provide attendees with an opportunity to provide input to the scope and content of the PEIR.

The scoping meeting will be held online via Zoom on **January 13, 2022 at 5:00 p.m. PST.**

Please visit <https://planning.lacounty.gov/site/climate/meetings-hearings/> to register for the meeting.

Published: December 30, 2021 Acorn Newspaper 210241

Date: 12/28/2021		Fiscal Year: FY 21-22		Department Tracking # (optional): #089		Department of Auditor-Controller - Shared Services Division				P.O. # <input type="checkbox"/> Agreement <input type="checkbox"/> Non-Agreement					
Request for Supplies and Services						Phone Number: 213-893-0060		Fax Number: 213-974-6384							
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Requestor's Name: Kai Hung Lai															
Delivery Location: (Address, Suite #, City, State and Zip Code) 320 W. Temple Street Room 1383, Los Angeles, CA 90012										Request For Supplies or Services Received					
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Signature/Approval - Division/Section Oscar Chica <small>Digitally signed by Oscar Chica Date: 2021.12.28 10:05:59 -08'00'</small>					Terms <input type="checkbox"/> Yes <input type="checkbox"/> No		F.O.B. Delivered		Source of Quotation		Purchasing Agent		Date Ordered		
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Appendix A.4

Scoping Meeting Materials

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Los Angeles County

Department of Regional Planning

Public Scoping Meeting for the Proposed **Los Angeles County 2045 Climate Action Plan**

January 13, 2022

Agenda

- **Introductions**

- Thuy Hua, Supervising Regional Planner, DRP
- Iris Chi, Regional Planner, DRP
- Cameron Robertson, Regional Planner, DRP
- Janna Scott, Director, ESA
- Brian Schuster, Senior Managing Associate, ESA

- **Project Description**

- **California Environmental Quality Act (CEQA) Process**
- **Purpose of CEQA Scoping meeting**
- **CEQA Environmental Issue Areas**
- **Project Timeline**
- **Scoping Comments & Public Review**



Project Description

What is a Climate Action Plan?

- Comprehensive roadmap that outlines the specific activities that an agency will undertake to reduce greenhouse gas emissions.



Project Description

The 2045 Climate Action Plan (CAP) would:

- Amend the Los Angeles County General Plan and replace the 2020 Community Climate Action Plan with the 2045 CAP



Project Description

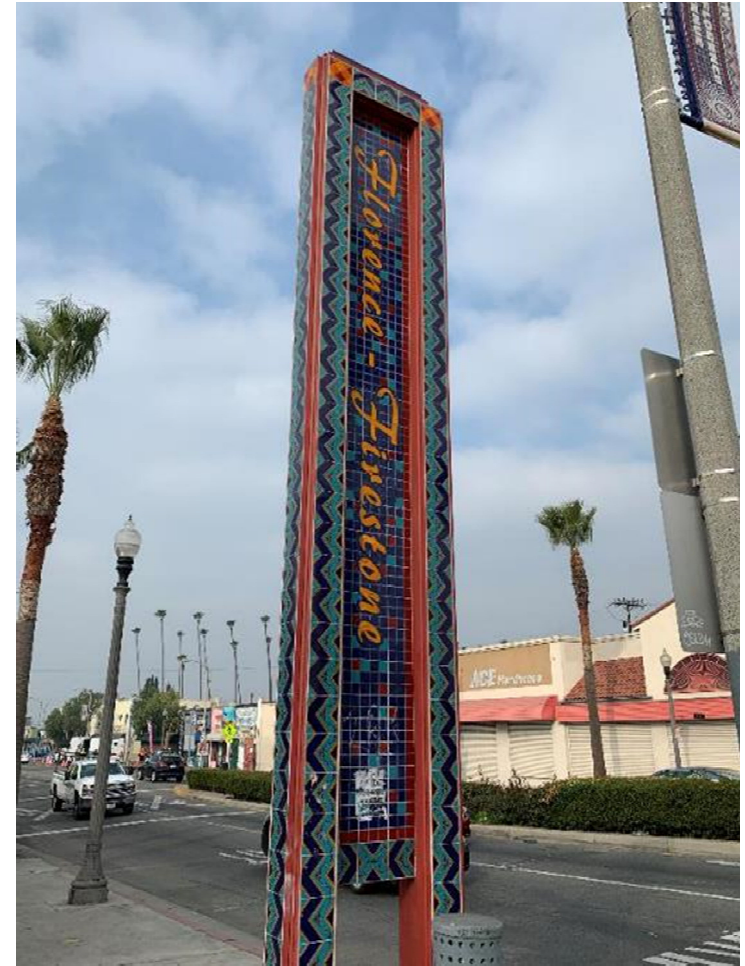
The 2045 Climate Action Plan would (continued):

- Include a new 2018 greenhouse gas (GHG) emission inventory
- Include emissions forecasts and targets for 2030, 2035, and 2045
- Update the GHG emission reduction strategy for unincorporated areas of the County with equity at the forefront through these sectors:



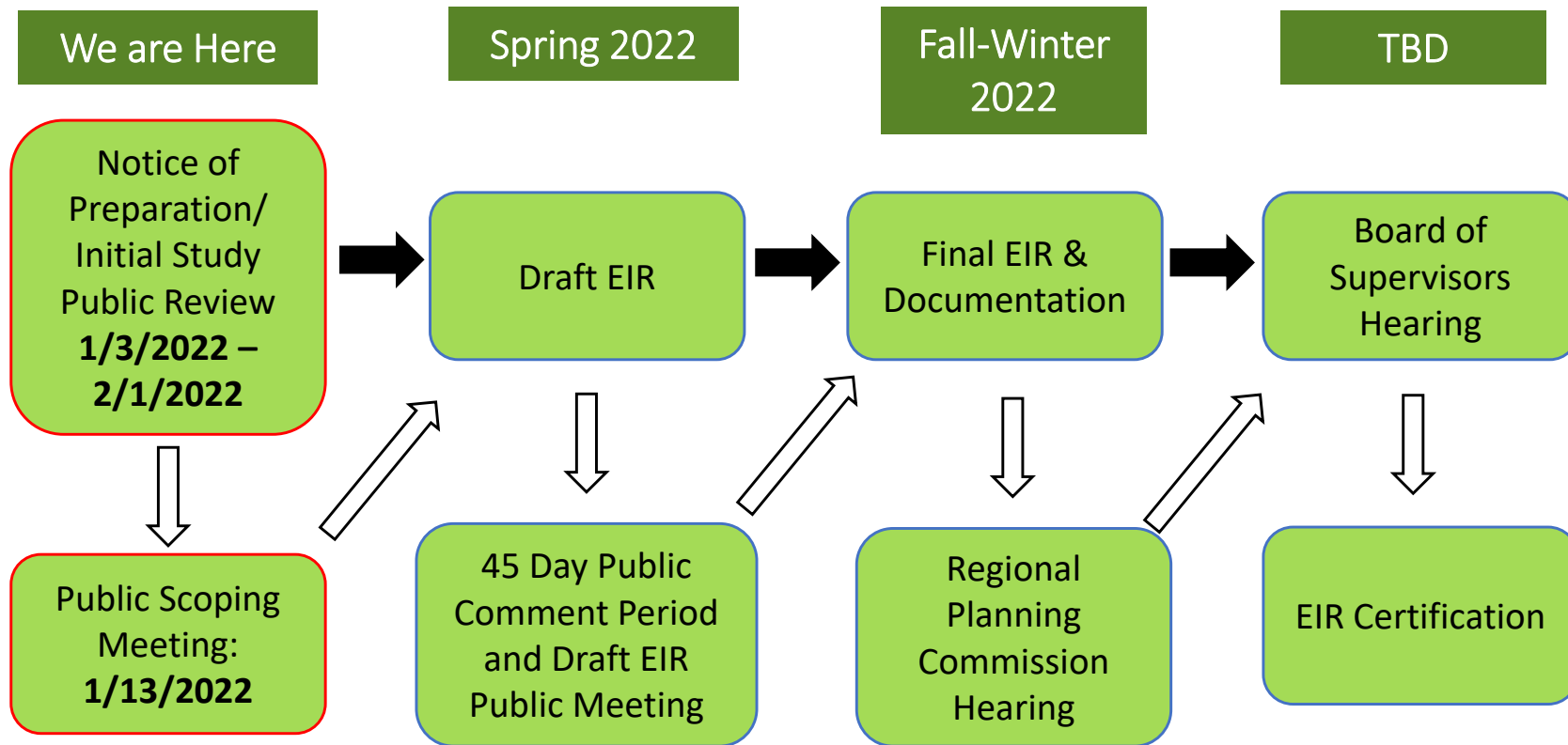
CEQA Process

- Required by law for all discretionary actions
- Informs public & decision makers
- Feasible ways to avoid, reduce, and/or mitigate impacts
- Considers alternatives
- Discloses significant & unavoidable impacts
- Opportunity to comment on the environmental issues



CEQA EIR Process & Schedule

EIR Milestones



Purpose of CEQA Scoping Meeting



- Receive information on the proposed project elements
- Review findings of the Notice of Preparation/Initial Study (NOP/IS)
- Obtain comments on specific environmental topics
- Inform the scope & nature of the Environmental Impact Report (EIR) analysis prepared under the California Environmental Quality Act (CEQA)



CEQA Environmental Issues Areas

Environmental Issue Areas Determined to have a Less Than Significant Impact:

- Aesthetics
- Agriculture / Forestry
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Population/Housing
- Public Services
- Recreation
- Transportation
- Utilities/Service Systems
- Wildfire



CEQA Environmental Issues Areas

Environmental Issue Areas with Potential Impacts:

- Air Quality
- Biological Resources
- Cultural Resources
- Noise
- Tribal Cultural Resources



Project Timeline and Public Comment

Jan 3, 2022 -
Feb 1, 2022

- Notice of Preparation Comment Period

Spring/Summer
2022

- Draft 2045 Climate Action Plan
- Draft EIR

Fall-Winter 2022

- Draft 2045 Climate Action Plan
- Final EIR
- Public Hearings



NOP Location and Contact Information

The NOP and Initial Study are available online at:

<https://planning.lacounty.gov/site/climate/los-angeles-county-cap>

Written comments are due by: **February 1, 2022 at 5:00 p.m.**

Please direct all responses to:

Thuy Hua

Los Angeles County Department of Regional Planning

320 W Temple St 13th Floor

Los Angeles, CA 90012

Email: climate@planning.lacounty.gov

Project website: planning.lacounty.gov/climate



Comment Period & Conclusion

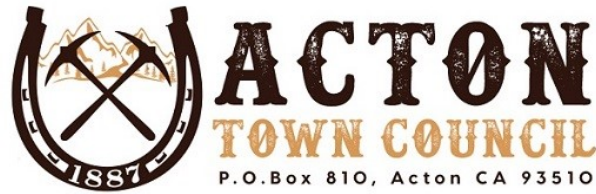


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Appendix A.5

Scoping Input Received

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February 1, 2022

Thuy Hua
Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012
Electronic transmission of 42 pages to:
climate@planning.lacounty.gov and
THua@planning.lacounty.gov

Subject: Acton Town Council Scoping Comments Regarding the Climate Action Plan.

Reference: Solicitation of Public Input on the Scope Program Environmental Impact Report for the Climate Action Plan Initiated January 3, 2022.

Dear Ms. Hua;

The Acton Town Council ("ATC") appreciates this opportunity to provide scoping comments on the Climate Action Plan ("CAP"). These comments are submitted within the 30-day time limit established by the Department of Regional Planning ("DRP") for the Scoping Interval that began on January 3, 2022; therefore, they are deemed timely filed.

As a preliminary comment, the ATC is concerned that the scope of the CAP as described in the Initial Study ("IS") is vague and therefore troubling. For instance, in the "Community" and "Zoning Designation" sections on page 1, the IS states that the CAP is applicable only in unincorporated areas of the County and will be implemented only in unincorporated areas of the County. Yet, page 2 states that the CAP will provide Greenhouse Gas ("GHG") emission reductions for regional GHG Reduction Actions ("GRAs") and page 41 states that the CAP establishes County-wide GHG emission reduction targets to achieve carbon neutrality by 2045. Additionally, the IS relies heavily on the Sustainability Plan (which is a County-wide document) and even the first CAP "strategy" that is identified in the IS refers to "Lead by Example". All of this indicates that the CAP will serve as a County-wide benchmark and will have a "County-wide" focus rather than an "unincorporated" focus. This is of substantial concern because it means that CAP goals, policies, and strategies will **not** be geared toward the rural communities that must comply with them and which comprise most of the County's unincorporated area; rather, they will be tailored to the "urban form" and urban land uses that predominate within the cities of Los Angeles

County. We see this trend clearly on page 4 of the IS which identifies Strategy 5 and directs the "transition of existing buildings to all-electric." This may be a perfectly reasonable approach in urban areas where temperatures do not drop much below freezing in winter, however it is a dangerous proposition for rural mountain communities where snow and freezing temperatures are common and where electrical service is highly unreliable (particularly over the last few years)¹. Therefore, "transitioning" existing buildings in these areas to all-electric service **will** lead to catastrophic results particularly in winter.

This example demonstrates the importance of clearly establishing that the CAP is only applicable to unincorporated areas, thus its scope is limited to circumstances that pertain to unincorporated areas. In other words, county-wide GHG emission targets, and the emphasis on regional GRAs and the county-wide Sustainability Plan have no place in the CAP. This is critical, because the rural communities which comprise the largest unincorporated area and are most affected by the CAP have development profiles, environmental circumstances, and land use policies that have nothing in common with the rest of the County. In other words, CAP strategies that are appropriate for cities and urban populations are neither suitable for, nor transferable to, rural unincorporated areas within the County; accordingly, the CAP must be specifically tailored to unincorporated communities and not used as a tool to decarbonize the entire County. Unfortunately, none of this is reflected in the IS. In fact, the IS demonstrates that the CAP will not include policies that are appropriate to rural unincorporated areas because it clarifies that the County intends to use the CAP to "Lead by Example" and show urban cities how to force change regardless of extant circumstances. It seems that the County is singularly disinterested in tailoring CAP strategies to rural unincorporated areas or ensuring that CAP policies are appropriate for the unincorporated communities which they govern.

Another general concern with the IS is that it consistently minimizes and erroneously trivializes the significantly adverse environmental impacts that CAP implementation will create. The IS downplays every environmental factor that it addresses by stating that the CAP is merely a "policy document" and claiming that it will not directly result in any impacts because it merely supports development already approved under the General Plan and because projects that implement the CAP will undergo CEQA review in the future. It is clear from these statements that the County does not grasp the scope, purpose, or intent of CEQA. First, adopted County policies *always* create environmental impacts because they direct County activities, ordinances, and decisions, and thereby clearly mandate change;

¹ For example, many Acton residents were without electrical power throughout the recent Thanksgiving holiday. Southern California Edison cut power to Acton residents on the day before Thanksgiving and did not restore service for two days. There was no reason for it; meteorological data taken for the area demonstrate that wind speeds were quite low. Yet, SCE cut power to Acton residents for 48 hours anyway and ruined their Thanksgiving; SCE did not restore power until late Friday afternoon. For more information on this incident, please see the comments submitted by the ATC to the California Public Utilities Commission provided as Attachment A.

that is why General Plans, Climate Action Plans, and other plans are always required to undergo CEQA review. The IS errs in declaring that the CAP will not directly result in impacts because if that were true, then the CAP itself would serve no purpose and its policies and targets would be utterly meaningless. Clearly, this is not the case because the IS states the County intends to use the CAP to create substantial changes in the County and thus "lead by example". Accordingly, it is categorically incorrect for the IS to claim that, as a mere "policy document", the CAP will not directly result in any impacts. Second, the CAP does not support development already approved by the General Plan; in fact, it radically alters adopted General Plan policies by mandating full decarbonization of every sector within every element of the adopted General Plan. The current General Plan does not envision full decarbonization and it never contemplated the environmental impacts of full decarbonization, so the IS factually errs in stating that the CAP merely supports development already approved under the General Plan. Third, it is a multifold violation of CEQA for the County to sidestep its obligation to conduct environmental review of CAP policies simply because the projects that implement these policies will undergo CEQA review at a later date; specifically:

- CEQA requires environmental review of CAP policies and targets and it explicitly mandates that the County consider alternative targets that will reduce environmental impacts while still achieving broad project objectives. So, for example, CEQA requires the County to consider alternatives to the CAP's 100% decarbonization target which will reduce significant environmental impacts while still achieve important decarbonization objectives. Simply put, CEQA requires the County to address the environmental impacts of CAP policies and CAP targets and consider alternative policies and targets *before the CAP is adopted*. This requirement is not satisfied by merely conducting CEQA reviews of individual projects which are implemented in the future to achieve CAP targets.
- CEQA requires the County to consider the cumulative effects of implementing CAP policies, and it does not permit the County to "silo" its environmental impact analysis by individually considering CAP implementation projects on a stand-alone basis and thereby ignore the extent to which these impacts are cumulatively considerable.
- CEQA does not permit a Lead Agency to defer CEQA review, yet that is precisely the outcome that will result if the County fails to conduct an adequate CEQA review of CAP policies simply because the individual projects that will eventually implement these CAP policies will someday undergo environmental review.

Accordingly, the ATC respectfully disagrees with IS conclusions regarding potentially significant adverse environmental effects of the CAP. Contrary to what the IS asserts, the CAP has the potential to create many significant adverse environmental impacts, thus CAP strategies and targets warrant proper environmental review.

In the interest of brevity, the remaining ATC comments are provided below and arranged according to topic.

The CAP Environmental Review Must Consider Alternatives to Decarbonization Targets, Waste Diversion Rates, and Other Strategies.

The IS asserts that, though not required by law, the CAP will achieve "carbon neutrality" by 2045 (page 1) and that this target is "county-wide" (page 41). Additionally, the IS asserts that the CAP will incorporate waste diversion strategies, water conservation measures, etc. (though it does not appear to identify actual targets for any of these strategies). Among other things, CEQA requires that the County identify alternatives to each of these CAP strategies (including "no project" alternatives) and assess the environmental impacts of each alternative and the climate change benefits that each alternative provides. These CEQA-mandated alternative analyses are critically important because they identify opportunities for reducing project impacts while still achieving broad project objectives.

To ensure a legally sufficient CEQA review, the County will have to consider various GHG emission reduction strategies, including those that do not achieve carbon neutrality by 2045. The IS indicates that the CAP environmental review will consider ""high and low" emission scenarios, and it mentions a "business as usual" forecast, but these terms are vague and not defined. The GHG reduction target alternatives that the County must consider to ensure a legally sufficient CAP environmental review (aside from the 2045 carbon neutral target) include a "no project" alternative (which is perhaps what the IS means by "business as usual") as well as a GHG emission reduction target that complies with current regulations but goes no further. Another GHG reduction alternative that should be considered is one which establishes a 2045 target that is midway between carbon neutrality and whatever is mandated by law. And, for each GHG reduction alternative, the County must identify the potentially significant adverse environmental impacts that it will create (including an analysis of the total acreage of solar panels, energy storage facilities, and transmission infrastructure required to achieve it) as well as the climate change reduction potential that it will provide so that the County can meaningfully determine whether the climate change benefits achieved by each alternative truly outweigh the adverse environmental impacts that it creates.

In a similar manner, the County must consider various alternatives to the waste diversion strategy, the water conservation strategy, and all the other CAP strategies identified in the IS to ensure an adequate CEQA review. For example, the ATC understands that the County is required to meet minimum waste diversion requirements over the next few decades, so an alternative that the county must consider in the CAP environmental review is one which achieves these regulatory requirements but goes no further. Another alternative that should be addressed is one that achieves diversion rates that are midway between the

minimum required by law and the actual target established by the CAP (which the IS fails to identify). And, for each alternative, the County must identify the adverse environmental impacts that it will create (such as the extent and location of all the new facilities that will be required to achieve them) and quantify the climate change benefit that it will provide so that a meaningful determination can be made regarding whether the benefits of each alternative truly outweigh its impacts. This is the only way to ensure a legally sufficient CEQA review.

The IS Improperly Ignores the Environmental Impacts of Expanding Utility Scale Solar Facilities in Rural Communities to Achieve CAP Decarbonization Goals.

According to the IS, a centerpiece of the CAP will be the full decarbonization of energy usage within 23 years through the expansion of renewable energy (particularly solar energy). According to the IS, there is no regulatory driver for achieving 100% decarbonization; it is merely something that the County wishes to accomplish. It is estimated that at least 43,000 acres of solar panels will be required to fully decarbonize the unincorporated areas of Los Angeles County²; accordingly, and to ensure compliance with the California Environmental Quality Act ("CEQA"), the environmental document prepared for the CAP must, *at a minimum*, consider the impacts of this solar panel development as well as the energy storage and transmission facilities that they will require for feasible operation. However, the IS makes it clear that the GHG emission reduction targets established by the CAP will actually be "county-wide" because the County wants to "lead by example"; this means that the CAP itself will be the foundation upon which county-wide

² According to the California Energy Commission ("CEC"), Los Angeles County consumed 65649.87 GWhr of electricity in 2020 (<https://ecdms.energy.ca.gov/elecbycounty.aspx>). Since unincorporated residents comprise approximately 10% of the population in Los Angeles County, unincorporated electrical consumption is approximately 6565 GWh per year. Since 30% of this consumption is already renewable, 70% (or 4596 GWhr) will have to be served by new solar facilities just to decarbonize the existing energy use profile (i.e., it does not account for the electrification of all future buildings and all existing buildings) According to the National Renewable Energy Laboratory ("NREL"), utility scale solar requires 3.4 acres per GWhr·year (<https://www.nrel.gov/docs/fy13osti/56290.pdf>), which means that more than 15,624 acres of new solar facilities will be required just to de-carbonize existing electrical consumption in unincorporated Los Angeles County. To achieve other CAP decarbonization goals (transportation electrification, building electrification, electric cars, etc.) it is estimated that twice as much solar facilities will be required; this brings the total up to 31,250 acres. And, according to the Southern California Association of Governments ("SCAG"), population in the County will grow by 20% by 2045, (https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_demographics-and-growth-forecast.pdf?1606001579) so the actual amount of new solar facilities required to achieve CAP goals in unincorporated Los Angeles County will be at least 37,500 acres. And, since "storage losses" of 10% and "transmission losses" of 5% are common, the actual number of acres required to fully decarbonize unincorporated Los Angeles County will be at least 43,000 acres.

decarbonization is achieved. As such, the environmental document prepared for the CAP must address the environmental impacts of achieving this county-wide decarbonization outcome. Specifically, CEQA demands that the CAP environmental document consider the impacts of developing more than 430,000 acres (or 672 square miles) of new solar panels as well as the energy storage and transmission facilities that these facilities will require to decarbonize all of Los Angeles County³. In other words, because the County will use the CAP as the primary tool for advancing decarbonization throughout the County, the CAP environmental review must consider the environmental impacts of achieving this county-wide decarbonization outcome.

Notably, the CAP's decarbonization goal can be achieved in one of two ways: either by directing renewable energy generation and storage to occur locally so that power is sustainably created where it is used (typically referred to as "distributed generation") or by directing renewable energy generation and storage to occur remotely in massive solar farms that are typically located in the desert and require the construction of extensive high voltage transmission lines through Very High Fire Hazard Severity Zones to deliver power to urban "load". It is certainly feasible to achieve the CAP's decarbonization goals via distributed generation because 1470 square miles of the County are already developed⁴ and can therefore easily accommodate 672 square miles of solar panels that are required to achieve CAP decarbonization goals county-wide.

Obviously, the environmental impacts of directing renewable energy generation and storage to occur locally will be relatively low because it will only affect the existing "built" environment (since it relies on existing roof tops using existing distribution lines and substations). Accordingly, a CAP that directs the expansion of distributed generation to achieve its renewable energy target can be reasonably deemed to create "less than

³ The CEC reports that Los Angeles County consumed 65649.87 GWhr of electricity in 2020 (<https://ecdms.energy.ca.gov/elecbycounty.aspx>). Assuming that 30% of this consumption is already renewable, 70% (or 45955 GWhr) will have to be served by new solar facilities just to decarbonize the County's existing energy use profile (i.e., it does not account for the electrification of all future buildings and all existing buildings). This will require more than 156,000 acres of new solar panels according to NREL data which reports that 3.4 acres of solar panels are required to produce a GWhr per year of solar energy (<https://www.nrel.gov/docs/fy13osti/56290.pdf>). This will double to more than 300,000 to accommodate all other CAP decarbonization goals (transportation electrification, elimination of natural gas for heating and cooking, electric vehicles, etc.). And, factoring the 20% population growth that SCAG projects for 2045 increases the number of acres of solar panels to achieve CAP goals county wide to more than 370,000. Factoring in the 10% storage loss and the 5% transmission loss that is always associated with renewable generation and transmission increases the total required solar panel area to more than 430,000 acres.

⁴ According to Page 90 of the Sustainability Plan, 64.4% of the County is classified as "natural area" which means that 35.6% is developed. And, according to page 15, Los Angeles County is 4,084 square miles in area. Together, these statistics demonstrate that more than 1,400 square miles of Los Angeles County is developed (.356 x 4084 = 1454).

significant" environmental impacts. However, if the CAP does not direct the development of distributed generation to achieve its decarbonization goals, then the environmental document will be required to consider the substantially adverse environmental impacts of developing more than 430,000 acres of remote utility scale generation and storage facilities in the pristine deserts of Southern California to achieve county-wide decarbonization as well as the new transmission facilities that will be required to serve these remote solar "farms". Under this circumstance, the impacts that will have to be addressed in the CAP environmental review are diverse, substantial, and they include (but are not limited to) aesthetics, transmission line wildfire ignitions, biological resource destruction⁵, farmland conversion, open space conversion, dust storms, valley fever, and increased asthma and respiratory insults in the rural communities of the Antelope Valley.

For example, the Audubon Society has clearly shown that utility-scale solar facilities in broad, open space areas that are rich with wildlife habitat (like the Antelope Valley) is particularly deadly to birds because they mistake the masses of solar panels as water bodies and the birds then collide with the panels when they try to land. Birds are also killed by the transmission lines that serve these utility scale facilities. That is why the Audubon Society supports "rooftop solar" over utility scale solar in open space areas as "ecologically ideal because it doesn't disrupt any habitat, but rather makes use of already-built space that would otherwise not go to productive use."⁶

The health impacts of the ambient dust generated by the construction and operation of utility scale solar farms are also of significant concern, particularly in the Antelope Valley where (according to health statistics compiled by Los Angeles County) the County's highest childhood asthma rates and COPD rates are found⁷ (actually, the incidence of these diseases in the Antelope Valley are among the highest in the nation). All of these existing health concerns will be substantially exacerbated by development of the additional utility scale solar facilities that will be required to achieve CAP decarbonization goals. CEQA does not permit the County to ignore these health impacts or any other adverse impacts posed by the 430,000 acres of solar panels that will be required to achieve CAP decarbonization goals county-wide.

⁵ The County is fully aware of the destruction to biological resources, habitat, and corridors that are created by remote solar farms in the Antelope Valley desert area. For example, solar project in the Antelope Valley have destroyed hundreds of Joshua Trees that are supposed to be "protected", and the Silverado project approved by the County destroyed large areas of burrowing owl habitat and relocated many burrowing owls with only limited success. Solar farms have fenced off tens of thousands of acres of desert lands, eliminated entire wildlife corridors, dislocated wildlife, and destroyed extensive habitats.

⁶ <https://www.audubon.org/news/solar-power-and-birds>

⁷ "Los Angeles County Indicators of Health" found here: http://publichealth.lacounty.gov/ha/docs/2015LACHS/KeyIndicator/PH-KIH_2017-sec%20UPDATED.pdf

The County seems to be at least dimly aware that CAP implementation could result in extensive new solar farms in the Antelope Valley. For instance, the IS affirms that the CAP will "incentivize" the development of solar facilities in rural areas (at 10, 15) and it specifically identifies the Antelope Valley as an area that will be targeted for such programs. (10, 12, 14, 15, 20). However, the CAP must avoid "incentivizing" the development of solar facilities in rural areas by directing the expansion of new solar facilities in developed areas only. If the CAP does not include such directives, then the County is *obligated* to address the environmental impacts of the 430,000 acres of remote utility scale solar facilities that will be required to achieve CAP decarbonization goals county wide.

Remarkably, the IS makes it clear that the County intends to *ignore* all the adverse environmental impacts posed by the 430,000 acres of solar panels that will result from CAP implementation because the IS only identifies Air Quality, Noise, Biological Resources, and Cultural Resources as environmental factors that will be considered in the CAP environmental review. Worse yet, the IS indicates that even these impacts will be given scant consideration. For example, neither the "Cultural Resources" section nor the "Tribal Cultural Resources" section give any consideration to the potential cultural resource impacts of the 430,000 acres of new solar panels that will result from CAP implementation county wide; these impacts are completely ignored. It is entirely implausible to presume that the installation of 430,000 acres of solar panels will not have any impacts on cultural or tribal cultural resources, yet that is precisely the premise adopted by the IS. The *only way* to ensure that CAP decarbonization goals do not impact cultural resources is for the CAP to direct new renewable resources toward developed areas; if the CAP does not include such directions, then the "Cultural Resources" section and the "Tribal Cultural Resources" section of the CAP environmental document must properly address the impacts of destroying 430,000 acres of land to achieve CAP decarbonization goals county wide. The "Air Quality" section of the IS is similarly deficient because it completely ignores the terrible dust storms and attendant valley fever concerns that will be created by expanding utility scale solar farms in the Antelope Valley to achieve CAP decarbonization goals. The IS section on "Biological Resources" is even worse: it indicates that the impacts of remote utility scale solar facilities will not be analyzed in the CAP environmental document at all because in the future, individual utility scale solar projects will "undergo site-specific review and CEQA analysis to analyze and mitigate potential significant impacts to candidate, sensitive, or special status species and their habitats". This approach violates CEQA in several ways. First, CEQA prohibits Lead Agencies from deferring analysis of potentially significant biological resource impacts, so the CEQA document prepared for the CAP must address "head on" the 430,000 acres of remote utility scale generation that will result from implementation of CAP decarbonization goals county wide if they are not met via distributed generation. Second, analyzing the environmental impacts of each utility scale solar project individually ignores the extent to which they pose cumulatively considerable impacts, thus it utterly violates CEQA.

The ATC cannot fathom why the IS completely ignores the environmental impacts of securing the renewable energy resources that will be required to achieve CAP decarbonization goals; perhaps the County is simply unaware of the enormous quantity of solar panels that these renewable energy resources will require. If this is the case, then this letter provides material factual evidence demonstrating that at least 43,000 acres of new solar panels will be required to achieve CAP decarbonization goals in unincorporated Los Angeles County, and at least 430,000 acres will be required to fully decarbonize Los Angeles County. Unless the CAP specifically directs these new solar facilities to be constructed in developed areas, they will cause significant adverse environmental impacts that must be addressed in the CAP environmental document. Anything less will constitute a gross violation of CEQA.

The IS Wrongly Eliminates Aesthetic Impacts from the List of Environmental Factors that Must be Considered in the CAP Environmental Analysis.

According to the IS, the County has concluded that CAP implementation will not result in any "Aesthetic Impacts" and thus does not intend to consider aesthetic impacts in the CAP environmental document. This is a mistake. The following paragraphs identify the errors noted in the IS, and demonstrate that aesthetic impacts must be fully addressed in the CAP environmental document.

Page 10 of the IS states "Other potential projects promoted by Draft 2045 CAP Strategies could include composting facilities, renewable energy generation facilities, or water recycling facilities which could be located in more rural areas of the County and, depending on the design and location, create a greater level of visual contrast compared with existing conditions." The ATC agrees that converting 430,000 acres in rural areas into solar farms and substantially expanding waste handling and composting facilities in rural areas will create a substantially "greater level of visual contrast in the rural areas where they will be constructed"; the waste facilities will also contribute significantly to odor problems as well. The Antelope Valley is already home to more than 50,000 acres of solar farms and two enormous dumps that serve the County of Los Angeles, so any incremental increase in such facilities in the Antelope Valley will be significant. Yet, and despite this clear acknowledgment that the CAP will pose significant aesthetic impacts in rural areas, the IS nonetheless declares that aesthetic impacts will be "less than significant" and it explicitly omits them from consideration in the CAP environmental document. This constitutes a grievous CEQA error which can only be rectified by ensuring that the CAP environmental review properly considers the significant adverse environmental impacts that CAP implementation will have in rural areas including (but not limited to) those pertaining to renewable energy generation and waste reduction.

Page 11 of the IS states "utility-scale solar energy generation projects would be required to comply with the Renewable Energy Ordinance (REO), which regulates ground-mounted solar projects to address community concerns and minimize environmental impacts. The REO requires that any ground-mounted solar project obtain a Minor Conditional Use Permit or Conditional Use Permit. Both permits require that ground-mounted solar be analyzed for negative visual impacts and the potential for the facility to impact the viewshed (LA County Office of the County Counsel, 2016). Compliance with the REO and the enforcement of conditions listed as part of the REO would ensure that the potential for small-scale and utility-scale solar energy generation projects to impact visual resources would be minimized." This statement is factually incorrect. The REO does **not** "ensure that the potential for utility scale solar energy projects to visual resources would be minimized" and County Counsel is flat out wrong to claim that it does. This is because the REO does not address impacts of utility scale renewable energy projects to visual resources; to the contrary, the REO only requires a "landscape buffer" in small areas which are never maintained so on the rare occasion when a few straggling bushes are planted, they quickly die and blow away. More importantly, the REO does not consider the cumulative aesthetic impacts of the 50,000+ acres of solar farms already in the Antelope Valley, and it will never address the cumulative aesthetic impacts of adding 430,000 acres of additional solar farms required to achieve CAP goals county-wide. Equally important, none of the CUPs issued for solar farms in the Antelope Valley have *ever* considered the cumulative impacts of the 50,000+ acres of solar farms that have already torn up the Antelope Valley, caused unbearable dust problems and turned entire sections of the desert into a sea of black glass. Therefore, the IS materially errs in declaring that the REO will adequately address the aesthetic impacts of all the new solar facilities required to achieve CAP decarbonization goals.

Page 12 of the IS states "The compliance of future projects with the General Plan and County Code would reduce the potential impact of future projects on scenic vistas." This statement is categorically false. Neither the General Plan nor the County Code ever contemplated 430,000 acres of new solar panels or even 43,000 acres of new solar panels because neither are founded on the full decarbonization profile that is established by the CAP. Because the CAP greatly expands decarbonization programs far beyond what was ever considered in the General Plan or is now contemplated by the County Code, it is a gross error for the County to declare that scenic vista impacts of new solar facilities developed to achieve CAP decarbonization goals will be reduced by merely complying with the General Plan and Zoning Code. Therefore, the IS materially errs in declaring that compliance with the General Plan and County Code is sufficient to protect scenic vistas from the massive solar farms that will result from CAP implementation.

Page 12 of the IS also states "some projects could result in more noticeable visual contrast and changes, especially if projects are located in more rural areas of the County such as solar projects proposed in the Antelope Valley" but "solar energy generation projects

would be required to comply with the REO, which includes conditions to reduce the visual impacts of solar projects". The extent to which this statement trivializes the conversion of at least 43,000 acres, and in reality, more than 430,000 acres of acres of desert land into solar farms is *stunning*, as is its vague and understated acknowledgement that these solar farms will create a "more noticeable visual contrast". The IS then compounds this grossly insupportable statement by wrongly declaring that the REO will reduce these visual impacts. Nothing could be further from the truth; the "landscape buffer" that the REO requires along small sections of a solar farm (which consists of a few straggling shrubs that provide no screening, are never maintained, and die within a few months anyway) does nothing to "reduce visual impacts of solar projects" and it will certainly not address the cumulative aesthetic impacts of the 43,000 - 430,000 additional acres of solar panels that will be required to meet CAP goals. Therefore, the IS materially errs in concluding that CAP implementation will not result in significant visual impacts.

Page 14 of the IS addresses whether the CAP will substantially degrade existing visual character because of the bulk or scale of the project, and the IS concludes that this concern will be less than significant because "The potential for utility-scale or other sized solar energy generation projects to be proposed in more rural areas such as the Antelope Valley would continue to be analyzed on a project-specific basis for purposes of CEQA." Notably, this statement does not support a finding of "less than significant" aesthetic impacts; in fact, it seems to suggest the opposite because it acknowledges that the CAP will result in new large utility scale solar projects in the Antelope Valley and that such projects warrant CEQA review (albeit in the future). On that basis alone, the County has a statutory obligation to conclude that the CAP poses potentially significant aesthetic impacts in the Antelope Valley. Worse yet, by declaring that the aesthetic impacts of solar projects in the Antelope Valley will be analyzed later on a "project specific basis", the County evinces a clear intent to improperly defer analysis of these potentially significant aesthetic impacts and improperly avoid addressing whether they are cumulatively considerable. The County is reminded that CEQA does not permit a Lead Agency to defer the analysis of potentially significant impacts to a later time and it certainly does not allow the Lead Agency to ignore cumulatively considerable impacts by separately analyzing individual projects in a "piecemeal" fashion.

In summary, the CAP GHG goals will require more than 43,000 acres of new solar panels just to decarbonize unincorporated areas and more than 430,000 acres to achieve county-wide decarbonization; if the CAP does not direct the expansion of these new solar facilities toward already developed areas, the CAP will cause devastating aesthetic impacts on remote rural areas. These aesthetic impacts, along with the associated aesthetic impacts of massive new transmission lines and energy storage facilities, must be addressed in the CAP environmental review because they will not be mitigated by merely complying with the General Plan (which never considered 43,000 acres of new solar farms let alone 430,000 acres) or complying with the REO (which fails to adequately address aesthetic concerns

and completely ignores cumulatively considerable aesthetic impacts). The ATC challenges the conclusion set forth in the IS that the aesthetic impacts of CAP implementation are "less than significant". We further assert that it is entirely unacceptable for the County to proceed with CAP development without a thorough examination of the significant aesthetic (and other) environmental impacts that CAP implementation will have on the rural residents of Los Angeles County as a result of the solar farms, transmission lines, storage facilities, and other accoutrement required to achieve compliance with CAP GHG targets.

The IS Ignores Many Environmental Impacts Because It Wrongly Asserts That Projects Implementing the CAP will be Located Within the Urban Environment.

The conclusions presented in the IS regarding potential environmental impacts are largely contingent on the assumption that projects implementing the CAP will occur in developed or "urban" areas⁸. However, this assumption is only valid if the CAP specifically directs that implementation of its policies occur in urban areas. Unfortunately, nothing in the IS states (or even suggests) that the CAP will direct the implementation of its policies to urban areas; in fact, the IS specifically identifies rural communities in the Antelope Valley as a likely location where solar development will occur to achieve CAP targets. In other words, there are significant contradictions in the assumptions which underlie the IS; as a result, IS conclusions regarding environmental factors that are based on these contradictory assumptions are completely erroneous. Accordingly, the CAP environmental review must address all the environmental factors that the IS wrongly removed from consideration because of erroneous assumptions including impacts that were eliminated based on the premise that projects implementing the CAP will occur in developed and "urban" areas".

Other Environmental Factors Wrongly Eliminated by the Initial Study.

According to page 8 of the IS, the following environmental factors are deemed to not be potentially significant impacts affected by CAP decarbonization goals: Energy, Geology/Soils, GHG Emissions, Hazards, Hydrology, Land Use, Minerals, Population and Housing, Public Services, Transportation, and Wildfire. The ATC disputes these conclusions for the reasons set forth below.

Energy: Achieving county-wide decarbonization in Los Angeles County will create profound changes in energy generation and delivery in the County, and these changes have the potential to create significant adverse impacts. The IS errs in concluding that, just because the CAP will not result in wasteful, inefficient, or unnecessary energy use or

⁸ For example, the IS analyses of aesthetic impacts, agriculture/forest impacts, biological resource impacts, population and housing impacts, and wildfire impacts all presume that projects implementing the CAP will be located within the urban environment.

conflict with a local plan, it poses no significant adverse energy impacts. For example, the CAP substantially increases our dependence on electrical energy; this will result in more blackouts and brown outs, particularly during the summer when peak loads cannot be met by available energy resources. This is not opinion, it is fact⁹. Additionally, the CAP strategy to decarbonize existing development by transitioning to all-electric facilities will substantially impact rural residents that do not have reliable electrical service and even expose them to life-threatening conditions (as discussed above). Furthermore, the existing distribution grid in Los Angeles County will likely require additional switchgear installations and other upgrades to accommodate the 430,000 acres of new rooftop solar that will be installed if the CAP directs county-wide decarbonization targets to be achieved via distributed generation. On the other hand, if the CAP directs its decarbonization targets to be met by remote utility scale generation facilities, then the existing transmission and subtransmission system that delivers power to the urban core of Los Angeles County will require substantial upgrades to accommodate remote generation from the 430,000 acres of new solar facilities that the targets require. In other words, the CAP's 2045 decarbonization target will require substantial alterations in the County's energy system and these alterations must be evaluated for their environmental impacts; thus, the IS errs substantially in eliminating energy as an environmental factor that must be addressed in the CAP environmental review.

Geology/Soils: The IS concludes that the CAP will not "Result in substantial soil erosion or the loss of topsoil" (page 37). This conclusion is incorrect. The installation of 430,000 acres of remote utility scale generation will result in extensive, permanent vegetation removal in fragile desert areas. This in turn will increase wind-blown dust and substantially alter topsoil profiles wherever solar farms are installed. This is a substantial concern in the Antelope Valley where soil stability is highly variable and where regulatory agencies including the AVAQMD and the Antelope Valley Resource Conservation District have struggled to address wind-blown dust from existing solar farms. The potentially significant topsoil impacts that will be created by the installation of 430,000 acres of new solar panels necessary to achieve CAP decarbonization targets must be addressed in the CAP environmental review; the only way the County can avoid addressing these impacts is if the CAP directs its decarbonization goals to be achieved through the expansion of distributed generation in already developed areas.

Hazards: The IS concludes that the CAP will not pose any significant hazard risk. The ATC disagrees. Achieving CAP decarbonization goals will require the addition of extensive new battery storage facilities to ensure power delivery when the sun is not shining and the wind is not blowing; it is estimated that thousands of megawatts of battery storage facilities will be required to decarbonize Los Angeles County. These battery storage facilities are prone

⁹ [https://www.nbcnews.com/news/us-news/california-warned-brace-another-summer-energy-blackouts-n1268879'](https://www.nbcnews.com/news/us-news/california-warned-brace-another-summer-energy-blackouts-n1268879)

to overheating, ignition and even explosion¹⁰, and once ignited, take days to burn out¹¹. Accordingly, they pose a significant hazard wherever they are located. The significant hazards posed by the extensive battery storage facilities that will be required to achieve the CAP's decarbonization target must be addressed in the CAP environmental review. Additionally, the development of 430,000 acres of solar farms in remote areas will substantially increase ambient dust levels and, by extension, increase the threat of Valley Fever and other respiratory insults to residents who will be exposed to the increased dust levels. These hazards must also be addressed in the CAP environmental review.

Hydrology: The IS concludes that CAP implementation will not substantially decrease groundwater supplies (page 49) or substantially alter existing drainage pattern (page 50). The ATC disagrees. If CAP decarbonization goals are achieved via remote utility scale generation, the 430,000 acres of solar farms that will be constructed will require significant quantities of water to wash and maintain the panels (panel washing must be done at least several times per year, particularly in desert areas where ambient dust degrades panel performance). Since these remote locations do not have access to recycled water resources, the solar farms will rely on groundwater resources. Washing 430,000 acres (or 672 square miles) of solar panels located in the desert several times a year will require significant quantities of groundwater, and the CAP environmental review must consider the impacts this will have on groundwater supplies. Additionally, utility-scale solar facilities require extensive grading to level the ground for optimum panel configuration; thus, installing the 630,000 acres of solar panels required to achieve CAP targets will result in significant grading and, by extension, significantly alter to drainage courses. Accordingly, the IS is wrong to conclude that the CAP will not alter existing drainage patterns.

Transportation: The IS concludes that CAP implementation will not substantially impact transportation. The ATC disagrees. CAP targets will de-carbonize all modes of transportation in Los Angeles County within 23 years and electrify all transit and vehicle facilities; this will expose the County's transportation system to new risks that have not heretofore been encountered. For example, events which affect the transmission grid will impede power deliveries to the County's urban areas and bring portions of the County's transportation network to a standstill. This is not hypothetical; in fact, a small fire at the Vincent transmission substation actually caused power flows on a major energy

¹⁰ <https://cleanenergynews.ihsmarket.com/research-analysis/vistra-battery-storage-facility-in-california-remains-shut-aft.html>
<https://www.genre.com/knowledge/publications/pmint21-3-en.html>
<https://www.insurancejournal.com/magazines/mag-features/2020/09/07/581175.htm>.

¹¹ <https://www.usatoday.com/story/money/cars/2021/08/02/tesla-megapack-battery-ignites-fire-australia-burns-4-days/5453874001/>

transmission corridor to be cut by more than 50%¹². The urban portions of Los Angeles County are served by only a handful of high voltage transmission substations; this makes Los Angeles County residents incredibly vulnerable to power disruptions. And, as the County's electrical dependence increases through implementation of the CAP, these vulnerabilities will become magnified, and they will become exponentially large if the CAP's decarbonization goals are met through expansion of remote utility scale renewable generation rather than local distributed generation. In other words, implementing the CAP via remote renewable generation will pose significant operational risks to the County's transportation infrastructure; these risks must be addressed in the CAP environmental review.

Wildfire: The IS concludes that CAP implementation will not pose significant wildfire risks and in particular the IS asserts that the CAP will not "exacerbate fire risk" (page 76) or require the construction of power lines or other utilities "that may exacerbate fire risk" (page 77). These conclusions are absurd. Implementation of CAP decarbonization targets will require massive increases in utility facilities that pose significant fire risks, including battery storage facilities (as discussed above). And, if the CAP does not direct new renewable energy facilities to be constructed in already developed areas, then achieving CAP decarbonization goals will require massive new transmission lines to deliver power from the 430,000 acres of new, remotely sited, utility scale solar facilities. These lines will be constructed within the Angeles Forest and in other mountainous areas that are designated as "Very High Fire Hazard Severity Zones" and as such will greatly increase wildfire risks. The IS wrongly concludes otherwise, and these risks must be addressed in the CAP environmental review.

Utilities: The IS concludes that CAP implementation will not result in the construction of new electric power facilities "the construction or relocation of which could cause significant environmental effects" (page 72). This conclusion is absurd. Implementation of the CAP's county-wide decarbonization targets will require the construction of more than 430,000 acres of new solar panels, thousands of megawatts of energy storage facilities, and extensive new grid facilities; accordingly, the construction and operation of these facilities will cause significant environmental effects. The environmental document prepared for the CAP must address the significant adverse environmental impacts of these facilities particularly if the CAP fails to direct new renewable energy development to occur in already developed areas.

¹² The Vincent substation connects the Los Angeles Basin to renewable resources located in the Antelope Valley and is a primary energy "node" serving Los Angeles County. It is also the southern terminus of the "Path 26" energy corridor connecting Southern and Northern California. A transformer fire at this facility caused Path 26 to be de-rated from 3000 MW to only 1400 MW. <http://www.caiso.com/Documents/DMAReportApril2003.pdf>

Specific Comments Regarding CAP Strategies, GHG Targets, and Other Matters Presented in the Initial Study.

The ATC offers the following specific comments pertaining to the various CAP strategies and GHG reduction measures identified in the IS.

- Strategy 2 identifies a Measure to "Develop Land Use Plans Addressing Jobs/Housing Balance & Increase Mixed Use". The problem is, the adopted County General Plan and the adopted Antelope Valley Area Plan already provide land use plans that address jobs/housing and establish appropriate "Mixed-Use" profiles. If different land use plans or new "mixed-use" profiles are established in the CAP, then the CAP itself will be in conflict with existing land use policies already adopted into the County General Plan and the Antelope Valley area Plan; this would violate the statutory purpose of the General Plan¹³. The ATC is particularly concerned by this measure because "mixed use" development is intrinsically contrary to the type of low density land uses that are established for the rural unincorporated areas which are subject to the CAP.
- Strategy 2 also asserts "Reduce single-occupancy vehicle trips". There is no justification for this strategy since the CAP GHG goals will be met by decarbonization. In other words, there is no need to deprive people of the freedom to drive where they wish and when they wish because they will be driving electric vehicles and therefore "single-occupancy vehicle trips" will not contribute to GHG emissions.
- Strategy 3 asserts "Expand Bicycle & Pedestrian Network to Serve Residential, Employment, & Recreational Trips". The ATC objects to the limitations that are placed on this strategy and the extent to which it ignores equestrian uses. It is unacceptable to limit the active transport policies established by the CAP to only address bicycle and pedestrian modes, particularly within Acton and in the other rural communities that will be subject to the CAP. This strategy must be expanded to address equestrian uses and secure an equestrian network to serve residential, employment, and recreational trips.
- Strategy 3 also asserts "Removal of Parking Minimums". This strategy will eliminate EV charging locations, reduce driving enjoyment, and it is not needed to achieve GHG reductions because GHG goals will be met through decarbonization. Therefore, there is no justification for "Removal of Parking Minimums".

¹³ "If a general plan is to fulfill its function as a 'constitution' guiding 'an effective planning process,' a general plan must be reasonably consistent and integrated on its face. A document that, on its face, displays substantial contradictions and inconsistencies cannot serve as an effective plan because those subject to the plan cannot tell what it says should happen or not happen." (*Concerned Citizens of Calaveras County v. Board of Supervisors* (1985) 166 Cal.App.3d 90, 97.)

- Strategy 5 includes " Transition Existing Buildings to All-Electric" and "Standardize All-Electric New Development". As indicated above, this strategy will not work in rural areas where electrical service is unreliable; it will result in casualties and even fatalities.
- Strategy 6 includes "Increase Renewable Energy Production". As indicated above, there are two ways to implement this strategy: either via distributed generation within already developed areas or via remote utility scale generation in rural and open space areas. Because the former poses relatively smaller environmental impacts, and the latter creates significant environmental impacts, it is essential that the CAP clearly articulate which of these two approaches will be incorporated in Strategy 6 implementation; it is also critical that the environmental document prepared for the CAP properly addresses the impacts corresponding to the Strategy 6 implementation program established by the CAP.
- Strategy 8 includes "Increase Use of Recycled Water and Gray Water Systems" and "Reduce Indoor and Outdoor Water Consumption". The IS provides no information regarding this strategy or the targets that it will establish for recycling water and reducing consumption, thus it is impossible for the public to provide meaningful scoping comments regarding this Strategy 8. And, without further information pertaining to this strategy or how it will be implemented, the public cannot comment on its implication or impacts. What is meant by "reduce indoor and outdoor water consumption"? Does the County plan to restrict water usage to meet the state goal of 50 gallons per person per day? If so, then the animal rescues, equestrian uses, and other uses in Acton will be eliminated by this strategy. Also, what does it mean to "Increase Use of Recycled Water and Gray Water Systems" particularly in unincorporated rural areas that do not have sewage facilities and are not supposed to have sewage facilities? The lack of detail provided by the County regarding Strategy 8 has prevented the ATC from providing substantive comments regarding its potential environmental impacts and thus thwarted the purpose and intent of CEQA scoping.
- Strategy 9 includes "Increase Organic Waste Diversion", "Maximize Countywide Diversion Rate", and "Institutionalize Sustainable Waste Systems & Practices". The IS provides no information regarding this strategy or the targets¹⁴ that it will establish for waste diversion and waste practices. As a result, the public cannot meaningfully comment on the implications or impacts of Strategy 9. Presumably, this strategy will increase the number of waste facilities in the County; it is also likely to increase trip rates because instead of having one trash pickup a week, residences will have three or more (organic waste, recyclable waste, and trash). If these facilities are located in remote areas, that will add to the transportation impacts of this strategy and it will

¹⁴ Page 74 of the IS states that Measure W3 includes a goal of "decreasing per capita waste by 35% by 2045" but this target is not described in the strategy details provided on pages 3-5 and it is not mentioned anywhere else in the IS, so it is not certain whether this is even an actual CAP target.

create adverse environmental impacts in the areas where they are located. Consideration must also be given to where the recycled/diverted waste will go. The ATC understands that the County is eager to increase mulch generation as a means of increasing diversion rates, but most mulch that is currently produced by facilities in Los Angeles County is contaminated with trash and it often has a terrible stench; this is because current standards allow a considerable amount of trash in organic material before it is mulched. Unfortunately, due to the lack of detail provided by the County regarding Strategy 9, the ATC is uncertain whether these comments are even relevant to the CAP scoping effort. In any event, we have been prevented from providing substantive comments regarding the potential environmental impacts of Strategy 9 in a manner that thwarts the purpose and intent of CEQA scoping.

- Page 2 of the IS states that the CAP will include revisions to address "locating new housing developments away from existing sources of air pollution". It is the ATC's understanding that matters pertaining to the location of new housing and the proximity of housing to air pollution sources lie within the purview of the General Plan Land Use Element, Air Pollution Element, and Safety Element (and perhaps the AVAQMD and SCAQMD); such matters do not belong in the CAP. The purpose of the CAP is to focus on climate action and not air pollution. If the CAP does include policies which locate new housing away from existing sources of air pollution, then the environmental document prepared for the CAP must address the displacement impacts that will be created by such policies. Additionally, any new CAP housing policies will have to be compared to policies already adopted in various General Plan and Area Plan elements to ensure they do not introduce any contradictions or pose increased environmental impacts beyond those considered when the elements were adopted.

Conclusion

The ATC respectfully requests that the County incorporate the comments offered above in the CEQA review that will be conducted for the CAP. If you have any questions or require additional information, please do not hesitate to contact us at atc@actontowncouncil.org.

Sincerely;



Jeremiah Owen, President
The Acton Town Council

Attachments



December 27, 2021

Director L. Palmer
Safety and Enforcement Division,
California Public Utilities Commission
505 Van Ness Avenue,
San Francisco, California, 94102
Electronic transmission of twenty four (24) pages to:
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Subject: The Acton Town Council Comments on the Southern California Edison's
Post Event Report dated December 10, 2021.

Reference: SCE De-energization Events of November 24-26, 2021

Dear Director Palmer;

The Acton Town Council ("ATC") respectfully submits the following comments on the "Post-Event Report" ("Report") addressing the "Public Safety Power Shutoff" ("PSPS") event of November 24 to November 26, 2021 that was prepared by Southern California Edison ("SCE"). The 15-day deadline established by D.19-05-042 for submitting comments on this PSPS event fell on Saturday, December 25; accordingly, and consistent with Commission Rule 1.15, these comments are being submitted on the next business day and are thus deemed timely filed. These comments will also be distributed to those on the Service List for R.18-12-005.

The Acton Town Council only recently became aware of the fact that portions of Acton are served by the Sand Canyon circuit; specifically, the entire east half of Segment 7 of the Sand Canyon circuit lies in Acton and serves Acton residents. As a result of the lengthy PSPS power shutoff that SCE recently initiated on this circuit, many Acton residents did not have electrical service before, during, and after Thanksgiving Day. Because this PSPS event greatly affected Acton residents, the Acton Town Council reviewed SCE's PSPS Post Event Report that was served to stakeholders late in the evening on December 10, 2021, and we noted several significant problems. Our concerns are provided below in a sectionalized format to facilitate review by Commission staff.

"Our lives begin to end the day we become silent about things that matter" Martin Luther King, Jr.

SCE's Post Event Report Fails to Accurately Describe PSPS Events Affecting Acton:

SCE's Post Event Report gives an inaccurate and arguably false description of the PSPS event experienced by Acton residents served by the Sand Canyon circuit. For instance, it states on page 36 that "On Wednesday night, November 24, (as discussed in Section 2.5) 428 customers on the Impala circuit were brought back online by a backup generator at 6:18 pm. Customers on the Sand Canyon, Energy, and Blackhills circuits (608 total) were restored to service around 8 pm". This is incorrect. Service to Acton residents on the Sand Canyon circuit was not restored until 2 days later on November 26. These Acton residents had no power either before, during, or after Thanksgiving Day.

SCE Did Not Utilize Sectionalization Effectively to Reduce PSPS Impacts in Acton

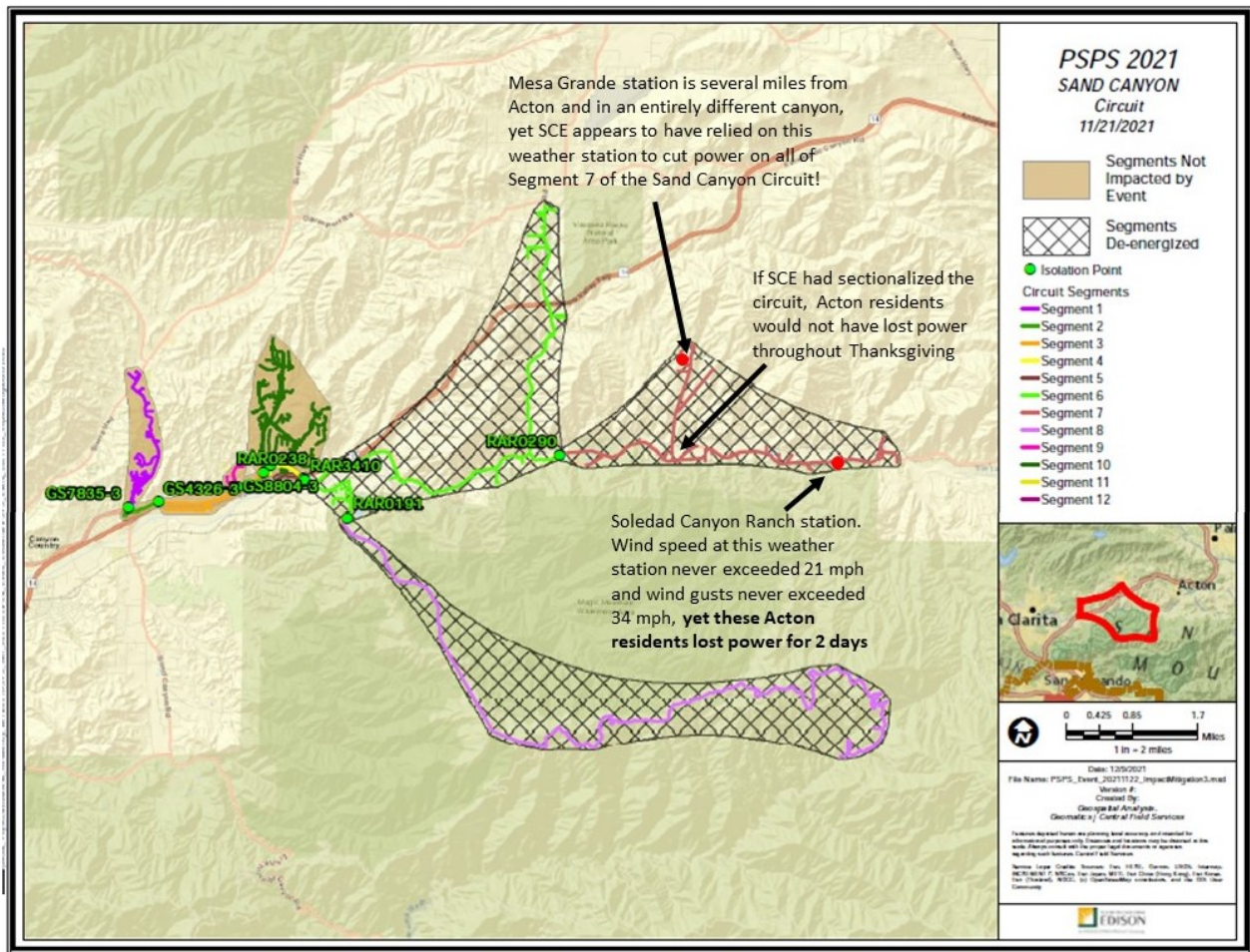
The ATC could find no reference to the weather station data that SCE relied upon to de-energize Acton residents before, during, and after the Thanksgiving holiday. Nonetheless, the ATC downloaded all the data from the weather station along the portion of Segment 7 of the Sand Canyon circuit that serves Acton (referred to as the "Soledad Canyon Ranch" station), and found that, for the entire 46-hour period during which Acton residents were de-energized over the Thanksgiving holiday, *sustained wind speeds never exceeded 20.6 mph and wind gusts never exceeded 33.5 mph* (see data provided in Attachment 1). In other words, *wind speeds on the portion of Segment 7 of the Sand Canyon circuit that serves Acton never even approached SCE's PSPS thresholds at any time before, during, or after Thanksgiving yet our residents lost power for 2 days anyway*. Notably, windspeeds of 27 mph were measured several miles northwest of Acton at the "Mesa Grande" station that is located in an entirely different canyon and is served by a branch off Segment 7 (see data provided in Attachment 2); however, this does not justify SCE's power shutoff to Acton residents because SCE should have segmented the Sand Canyon circuit at the branch point and thus only de-energized customers in the vicinity of the "Mesa Grande" station. This fact is shown more clearly in Figure 1 below, which reproduces the Sand Canyon circuit map provided on page 113 of SCE's post Event Report and shows where SCE should have deployed sectionalization to prevent Acton residents from losing power throughout the Thanksgiving holiday.

SCE Relies on Unreasonable Windspeed Thresholds to Initiate PSPS in Acton.

SCE continues to cut power in Acton based on unreasonably low windspeed thresholds; according to the "Event Data Workbook" spreadsheet that SCE submitted with its Post Event Report dated December 10, 2021, SCE denied power to Acton residents over the Thanksgiving holiday based on a sustained windspeed threshold of only 26 mph and a wind gust threshold of only 39 mph. As the ATC has repeatedly pointed out in numerous documents filed with the Commission¹, cutting power to customers at such

¹ "The Acton Town Council's Comments on the Proposed Decision Addressing the Late 2019 Public Safety Power Shutoff Events" filed May 10, 2021 in Proceeding I.19-11-013 at 6, 10. Application for Rehearing of Decision D.21-06-014 by the Acton Town Council submitted on July 7, 2021 at 10. See "The Acton Town Council Opening Comments on the Proposed Decision Adopting Phase 3 Revised (cont'd.)

Figure 1. SCE's Sand Canyon Circuit with Annotations Indicating Where Sectionalization Should Have Been Deployed.



low windspeed thresholds violates the reasonableness standard established by Commission Resolution ESRB-8 because such de-energization events are driven by structural deficiencies on SCE's distribution system rather than the presence of "strong

and Additional Guidelines and Rules for Public Safety Power Shutoffs (Proactive De-Energizations) of Electric Facilities to Mitigate Wildfire Risk Caused by Utility Infrastructure" filed June 10, 2021 in Proceeding R.18-12-005 at 3, 5. See also "Application for Rehearing of Decision D.21-06-014 by The Acton Town Council" filed July 7, 2021 in Proceeding I.19-11-013 at 15-17, 22. See also ATC Supplemental Comments on 2021 Wildfire Mitigation Plan Updates submitted to the Commission March 29, 2021; see also all ATC comments on all SCE PSPS post-event reports filed in 2020 and 2021, particularly those dated March 1, 2021.

winds"²; this renders SCE's PSPS events *intrinsicly and explicitly unreasonable*. SCE openly admits that its PSPS windspeed thresholds are driven by "circuit health" concerns (see page 10 of the December 10, 2021 Post Event report); SCE defines "circuit health" based on the number and extent of structural deficiencies existing on the circuit. Specifically, SCE's "circuit health" factors are derived from the number of structures that are either "imminently about to fail" (referred to as "P1" structures) or will fail within 6 months (referred to as "High P2" structures)³. SCE also openly admits that it utilizes low windspeed thresholds on circuits that have "a history of local circuit outages at lower wind speeds" (see page 10 of the December 10, 2021 Post Event report). At the very least, this assertion proves that portions of SCE's distribution facilities are demonstrably incapable of reliable operation under moderate wind speeds and therefore violates Commission-adopted structural standards codified in General Order 95 ("GO95"). Equally important, the application of low windspeed thresholds to facilities that have "a history of local circuit outages at lower wind speeds" demonstrates that SCE prefers to simply de-energize its customers rather than maintain circuits in a manner that serves customers reliably. Finally, this statement is an open admission that at least some of SCE's equipment is neither constructed nor maintained to a standard that is sufficient to accommodate "known local conditions" as required by GO95⁴ because if it were, there would be no "history of local circuit outages at lower wind speeds".

All of this demonstrates conclusively that SCE does not maintain its distribution equipment in compliance with adopted Commission orders; as a result, SCE's distribution equipment poses wildfire risks to Acton residents and others. Since 2019, SCE has reduced its exposure to the wildfire liability risk posed by its own deficient equipment by simply cutting power; in so doing, SCE has routinely increased

² Resolution ESRB-8 establishes that a de-energization event is "reasonable" only if there is an imminent and significant and significant risk that "strong winds" will topple power lines or cause major vegetation related impacts [at 4]. The Commission has determined that electrical facilities which comply with General Order 95 ("GO-95") are capable of withstanding wind loads greater than 56 miles per hour (D.09-09-0309 and D.14-02-015), so winds less than 56 mph do not pose a "danger" of toppling power lines. Regarding the risk of "vegetation related impacts": The National Weather Service recognizes the "Beaufort" Scale which establishes winds must exceed 39 mph before twigs come off trees thus an "imminent and significant risk" of "major vegetation related impacts" does not exist when winds are below 40 mph. [<https://www.weather.gov/mfl/beaufort>],

³ See page 5 of discovery response from SCE to the ATC dated March 23, 2021 that was provided to the Commission in Attachment 1 of the "Application for Rehearing of Decision D.21-06-014 by the Acton Town Council" filed July 7, 2021 in Proceeding I.19-11-013.

⁴ Rule 31.1 of General Order 95 states (with emphasis added) "A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or *known local conditions* require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company *shall follow the higher standard*."

public safety hazards significantly. These de-energization events have violated SCE's statutory obligation under the Public Utilities Code; specifically, §399.2 (which requires SCE to operate their distribution equipment in a safe and reliable manner) and §451 (which requires SCE to furnish and maintain adequate electrical service necessary to promote public safety). These de-energization events have also controverted the Commission's express directive that "Under no circumstances may the utilities employ de-energization solely as a means of reducing their own liability risk from utility-infrastructure wildfire ignitions"⁵.

Despite the extensive evidence provided by the ATC to the Commission since 2019 which demonstrates that SCE equipment deficiencies violate Commission Orders, and despite its own statutory obligation under §2101 of the Public Utilities Code to enforce statutes affecting public utilities and see "that violations thereof are promptly prosecuted", the Commission has persistently declined to initiate any reasonableness reviews of SCE de-energization activities⁶ *even though its own adopted decisions and directives require such reviews*⁷. This lack of Commission interest in enforcing its own standards and ensuring compliance with basic reliable electrical service requirements imposed by the Public Utilities Code is inexplicable. It is also astounding, given the scope of SCE distribution equipment deficiencies that were revealed in various Commission reports that were released just last month⁸. The Commission cannot stand by any longer; it has a statutory obligation to investigate the reasonableness of SCE's de-energization events and assess the extent to which these events violated §399.2 and §451 by denying customers safe and reliable power because they were initiated to mask equipment deficiencies and thereby avoid liability. The salient issue that the Commission has persistently failed to address is that SCE initiates PSPS events in Acton and elsewhere because its distribution equipment is deficient; this fact is demonstrated by SCE's persistent use of a 26 mph or less windspeed threshold for cutting power to Acton residents. Notably, it is not just the community of Acton that is saddled by these low windspeed thresholds; 20 of the circuits that were affected by SCE's PSPS event over

⁵ D.19-05-042 at 68.

⁶ The Commission recently affirmed that it "has not to date undertaken a review of the reasonableness of **a utility's decision to call a PSPS event**" [D.21-06-034 at 23].

⁷ D.19-05-042 at 107. Also, ESRB-8 affirms the need to "assess the reasonableness of all electric IOU de-energization events in order to ensure that the power shut off is executed only as a last resort and for a good reason" [at 4]. Also, the Scoping Memo issued on August 3, 2020 in Proceeding I.19-11-013 affirms that the Commission's Safety Enforcement Division will "engage in a reasonableness review of all PSPS events" [page 5 at FN11].

⁸ See Commission investigation reports released November 2021 on the Liberty, Meyers, Rye, Thomas and Woolsey fires found here: <https://www.cpuc.ca.gov/industries-and-topics/wildfires/wildfires-staff-investigations>.

the Thanksgiving holiday have windspeed thresholds of 26 mph or less⁹. And, as the ATC has previously pointed out, nearly 50 of SCE's distribution circuits have sustained windspeed thresholds less than 31 mph¹⁰.

Finally, it must be clarified that *the ATC does not object* to cutting power on structurally deficient equipment to prevent wildfire ignitions; to the contrary, de-energization under such circumstances is critical to protecting life and property. If SCE had de-energized its equipment in a timely manner, the Thomas, Woolsey, Rye, Meyers, and Liberty conflagrations may have been avoided. Similarly, the Kincade, Zogg, and Camp fires could perhaps have also been avoided if PGE had de-energized its equipment. What concerns the ATC is that every de-energization event that SCE initiates to avoid wildfire ignitions on substandard or structurally deficient equipment constitutes a failure to operate distribution equipment in a safe and reliable manner and is therefore a direct violation of §399.2 of the Public Utilities Code. This is because SCE sacrifices reliability for safety if it de-energizes a distribution circuit when deficiencies on the circuit pose a wildfire risk. Additionally, every de-energization event poses a substantial public safety risk¹¹; thus, every time SCE cuts power to prevent wildfire ignitions on deficient or substandard equipment, it violates §451 by failing to maintain adequate electrical service necessary to promote public safety. *What the ATC does object to* is that SCE is never held accountable for these violations. More specifically, the ATC objects to the manner in which SCE continually violates Public Utility Code provisions pertaining to public safety and electrical reliability; we further object to the Commission's abject refusal to conduct "reasonableness reviews" of SCE's PSPS events and thereby investigate these violations. SCE's actions can perhaps be accounted for by the fact that, as a corporation, it avoids the destruction and attendant liability of a wildfire sparked by deficient equipment by simply cutting power at low windspeeds. However, the Commission's persistent refusal to conduct any "reasonableness reviews" of the numerous and extensive PSPS events that have occurred over the last three wildfire seasons cannot be accounted for, particularly in light of its prior commitment to "assess the reasonableness of all electric IOU de-energization events in order to ensure that the power shut off is executed only as a last resort and for a good reason"¹². Furthermore, the Commission's willful abrogation of its statutory duty under the Public Utilities Code to promptly prosecute violations of statutes affecting public utilities is bizarre and unfathomable. The Commission's inaction has substantially undermined public

⁹ See the "Event Data Workbook" spreadsheet that SCE submitted with its PSPS Post Event Report filed December 10, 2021 [Tab T03].

¹⁰ Application for Rehearing of Decision D.21-06-014 by the Acton Town Council submitted on July 7, 2021 at A2-3.

¹¹ D.09-09-030 at 30-40.

¹² Resolution ESRB-8 at 4.

safety¹³ and contemporaneously served the interests of utilities like SCE because it permits them to sidestep their obligation to provide safe and reliable power and maintain adequate electrical service to promote public safety; it bears all the hallmarks of "regulatory capture"¹⁴. The Commission must shake off the deference that it has shown and continues to show to SCE and other utilities and begin to act in the interest of the public by conducting reasonableness reviews of PSPS events and holding utilities accountable when they violate the Public Utilities Code by shutting off power to mask equipment deficiencies and thereby protect themselves from liability.

SCE Fails to Identify and Weigh the Public Safety Risks Posed by its PSPS Events.

The Commission has repeatedly ordered utilities like SCE to include in every PSPS Post Event Report an "explanation of how the utility determined that the benefit of de-energization outweighed potential public safety risks"¹⁵; these orders were driven by the utility's statutory obligation under Public Utilities Code §451 to promote the safety of their customers. The public safety risks that SCE is supposed to consider were carefully laid out in D.09-09-030 and include, but are not limited to: wildfire risks due to the widescale use of generators, barbeques, camp stoves, candles, and lanterns; disruption in communication networks; loss of customer communication access; disruption to emergency communication and evacuation procedures; endangering customers with disabilities, adversely impacting schools, adversely impacting water supply to fight fires and serve domestic needs, impairment of traffic control measures, and diversion of public safety personnel. Notably, every one of these adverse impacts occurred as a result of SCE's PSPS activities in 2019 (as the ATC pointed out in all of our filings submitted in Proceeding I.19-11-013). Instead of addressing these risks and showing that they were outweighed by a discernible public safety benefit, SCE's December 10 2021 Post Event Report contrives something called a "PSPS Risk" that is based on unidentified studies and undisclosed information pertaining to the "2003 Northeast Blackout" and the "2011 Southwest Blackout" addressing consequences from "food spoilage" and "underlying health conditions" in terms of "fatalities and serious injuries per customer minutes interrupted". Notably, the "2011 Southwest Blackout lasted only 13 hours, and the 2003 Northeast Blackout was largely resolved within 14 hours; neither of these events provide any indication of the real public safety risks that result from multiple days without power (which are so common in SCE PSPS events). The Commission is aware that the public safety risks posed by PSPS events are not linear

¹³ By failing to hold utilities accountable for unreasonable power shutoffs, the Commission permits such activities to persist unfettered and thereby directly and substantially contributes to increased public safety risks.

¹⁴ Regulatory Capture is evidenced by a body of commission actions or inactions where "what the regulated entity wants has more influence than what the public interest requires." Scott Hempling, *"Regulatory Capture: Sources and Solutions"*; EMORY LAW CORPORATE GOVERNANCE & ACCOUNTABILITY REVIEW. 25 (2014).

¹⁵ D.19-05-042 at 108; D.21-06-014 at 49; D.21-06-034 at 23.

with time; risks increase substantially with every incremental hour of power shutoff because people become more desperate¹⁶. However, none of this is accounted for in SCE's "PSPS Risk". Moreover, SCE claims that its "PSPS Risk" value is informed by Post Event Reports submitted by investor-owned utilities in 2019, but provides no corroborating information. In fact, the risk parameters that SCE used are not quantified anywhere in the report and the formula that SCE contrived to derive the infinitesimally small "PSPS Risk" that it claims for each circuit is not even disclosed in the spreadsheet that was filed with its Post Event Report¹⁷. In other words, the Commission has insufficient information to conclude that SCE did in fact comply with Commission directive and "weigh" the actual and material public safety risks posed by its PSPS events before cutting power over the Thanksgiving holiday. And, given the widespread public safety risks that materially resulted from SCE's previous PSPS events, it is a certainty that the infinitesimally small public safety risk that SCE claims was posed by its November 24-26 power shutoff event is absurdly underpredicted.

SCE's December 10, 2021 Post Event Report also presents something called a "Wildfire Risk" parameter that appears to be an amalgamation of a projected wildfire "footprint" (i.e., the size a fire could become if it were to ignite) and the number of structures and residents that would be affected within that footprint. SCE then factors in an estimated number of fatalities and injuries that could result if such a wildfire were to occur; this value is then normalized to derive a number which is less than 1 and represents fatalities and injuries that will result if a wildfire were ignited in the vicinity of a particular circuit. Unfortunately, SCE's "wildfire risk" is substantially over predictive for a number of reasons, not the least of which is that it presumes no firefighting resources are deployed to combat the wildfire that is assumed to occur; the wildfire is assumed to rage unabated for 24 hours without any fire suppression or structure protection activities. Moreover, SCE's "wildfire risk" parameter does not factor in the risk that an ignition event will even occur; instead, SCE just assumes that a wildfire is ignited on every circuit. As a result of these and other assumptions, SCE's "wildfire risk" model substantially overstates the "benefits" that are derived from its PSPS events; the extent to which these "benefits" are grossly overstated is revealed by putting SCE's "wildfire risk" model in proper context. For instance, SCE projects the "wildfire risk" posed by the "Stubby" circuit during a single 24-hour wind event is 0.2362¹⁸; mathematically speaking, this

¹⁶ As the ATC has previously pointed out, customer behavior becomes more risky as the length of time they were without power increases. For instance, we have informed the Commission that an Acton resident reported seeing a person at a local gas station who was so desperate for fuel to operate their generator during a lengthy SCE PSPS event that they were pumping gasoline into all sorts of containers, including a glass jar. [Comments on the Safety and Enforcement Division's "Public Report on The Late 2019 Public Safety Power Shutoff Events" From the Acton Town Council (FN 12)].

¹⁷ See "Event Data Workbook" spreadsheet that SCE submitted with its Post Event Report dated December 10, 2021 (tab T04).

¹⁸ Ibid.

means that an injury or fatality is projected to result from a wildfire ignition on the "Stubby" circuit once every four years if it experiences one wind event per year. If the "Stubby" circuit experiences four wind events per year, then SCE's model predicts that a wildfire-related injury or fatality will occur once per year. Such projections are completely insupportable by historical evidence; the "Stubby" circuit has existed for decades, and insofar as the ATC is aware, no injury or fatality ever resulted from a catastrophic ignition on the "Stubby" circuit during a wind event prior to 2019 (when PSPS events became commonplace). As another example, consider the "Sand Canyon" circuit that serves Acton residents and was de-energized by SCE due to "high winds" at least 4 times in 2020 and 4 times in 2021: SCE projects the "wildfire risk" posed by the "Sand Canyon " circuit during a single 24-hour wind event is 0.0703¹⁹; mathematically speaking, this means that an injury or fatality is projected to result from a wildfire ignition on the "Sand Canon " circuit approximately once every three years if it experiences four wind event per year. This risk projection is absurdly over-predictive: the Sand Canyon circuit dates back to the middle of the last century and it experiences frequent wind events every year; yet, insofar as the ATC is aware, it has never caused any wildfire ignitions that resulted in any injuries or fatalities.

Another reason SCE's PSPS risk/wildfire risk model is so erroneous is because it considers each de-energized circuit individually and fails to consider the cumulative impacts of cutting power on multiple circuits in a large area. As the ATC has previously pointed out, SCE's PSPS events cut power from Palmdale to Santa Clarita, and affect an area that is more than 200 square miles; the cumulative disruptions and attendant public safety risks posed by such widespread power shutoffs is completely ignored by SCE's risk methodology.

SCE's "wildfire risk" values are so over-predictive and its "PSPS Risk" values are so under-predictive that they do not represent anything real and they are certainly not consistent with historical data. For instance, the Commission is aware that SCE's PSPS events in 2019 resulted in wildfires that forced the evacuation of tens of thousands of people, burned thousands of acres and numerous structures, prevented wildfire suppression, impeded access and egress, prevented emergency evacuation orders from being received, and caused numerous injuries²⁰. Based on this evidence, it is certain that PSPS events pose substantial public safety risks that are at least on par with the public safety risks they are intended to prevent; yet, SCE's model contrives completely opposite results which conclude that risks posed by any PSPS is several orders of magnitude less than risks posed by a utility-ignited wildfire. Nothing could be further from the truth, and the magnitude of errors that are imbedded in SCE's model is

¹⁹ Ibid.

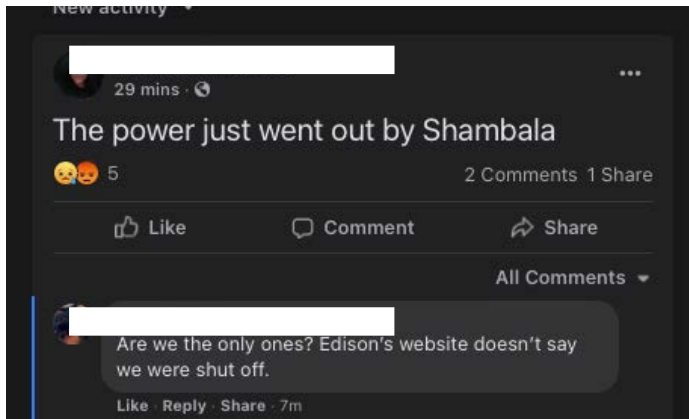
²⁰ See ATC comments submitted to the Commission in Proceeding I.19-05-042, R18-12-005, and R.18-10-007. See also personal experiences relayed by Acton residents to SCE on November 4, 2019 found here: <https://www.youtube.com/watch?v=Og9cJJZ61Mk&t=2101s>.

revealed through a simple comparison of SCE's claimed "PSPS Risks" to SCE's claimed "Wildfire risks". For instance, consider the "Acosta" circuit that serves approximately 3,800 people and which was de-energized for nearly 48 hours over the Thanksgiving holiday: according to page 15 of SCE's Post Event Report, cutting power on the "Acosta" circuit on Thanksgiving eliminated the risk of 213 wildfire-related injuries/fatalities compared to the risk of a single injury/fatality posed by the PSPS event itself. It is certainly likely that a 48-hour PSPS event on the "Acosta" circuit would result in at least one injury or fatality (if not more). However, it is absurdly implausible to conclude that an ignition on the Acosta circuit is likely to result in 213 fatalities/injuries (which is more fatalities/injuries than have occurred in recent wildfire events). In other words, SCE's model is so grossly over-predictive of the wildfire risk posed by its circuits, and it is so grossly under-predictive of the very real and demonstrably significant public safety risks that were created by its PSPS events over the Thanksgiving holiday that SCE's Post Event Report does not comply with the Commission directive that SCE demonstrate that PSPS risks were outweighed by clearly quantified benefits. Accordingly, SCE has failed to demonstrate that it complied with its statutory mandate under Pub. Util. Code § 451 to furnish and maintain adequate electrical service necessary to promote public safety; accordingly, the Commission must censure SCE for its most recent PSPS event.

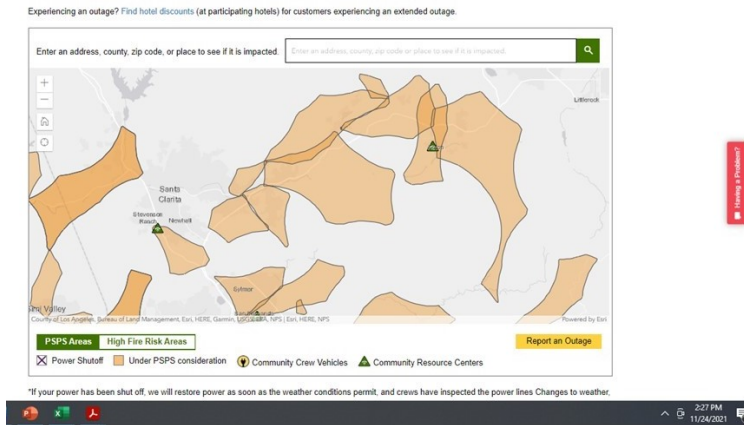
SCE's Notification Process Continues to be Substandard and Deficient.

SCE's Post Event Report dated December 10, 2021 states that more than 30,000 customers did not receive a "1- to 4-hour imminent notification" and more than 3,500 entities did not receive any notification before de-energization. SCE also reports that more than 3,000 customers did not receive any notification before re-energization. These numbers are abysmal. The ATC is particularly concerned about the failure to notify customers before re-energization because of the risk to life and property that such failures create; customers who rely on generators must be notified in advance before re-energization occurs so that they can disconnect their generator before power is restored. This is important; generators that are operated without a transfer switch pose a significant fire danger if they are still operating when system power is restored. It is noted that generators are not supposed to be operated without a transfer switch, however it is naively unrealistic to assume that all of SCE's customers have the knowledge and expertise to properly configure and connect their generator.

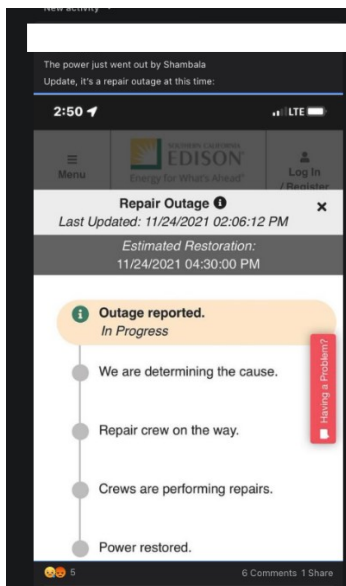
The ATC also notes that SCE's Post Event Report dated December 10, 2021 fails to disclose the abysmal notification process that Acton residents experienced. On November 24 at approximately 2:15, power was cut in southwest Acton; SCE's website was accessed by an Acton resident, but it showed that there were no de-energization activities anywhere in the area. The following is a screenshot of the text trail:



The SCE website was accessed at 2:27; it showed no PSPS activities in or near Acton:



By 2:50, SCE reported the power shutoff in Acton as a "repair"; here is the screenshot:



The power remained off for 2 days.

Conclusion

Naturally, Acton residents are grateful that SCE's multiday power shutoff over the 2021 Thanksgiving holiday was not as widespread in our community as its power shutoff event during the 2020 Thanksgiving holiday. However, the very fact that our residents are grateful to SCE for not cutting their power and ruining their Thanksgiving *is extremely troubling*, and it warrants Commission action. Utility customers are not supposed to be grateful when a utility deigns to sell them power; this is particularly true in rural communities like Acton where individual property owners are forced to pay enormous developer fees to SCE for extending distribution facilities to provide electrical service to their properties. Customers should expect reliable electrical service and the Commission has a statutory obligation to do everything in its power to see that such customer expectations are met; however, this is not the case today. Since 2019, SCE has routinely cut power to customers and thereby endangered lives and property because of inexcusable infrastructure deficiencies, and it does so with impunity because the Commission refuses to assess the reasonableness of SCE's de-energization decisions. The magnitude of the Commission's commitment to not enforce the Public Utilities Code and compel SCE to provide reliable electricity was recently revealed in D.21-06-014 which concluded that no deterrence measures were warranted even though SCE and other utilities extensively violated Public Utilities Code §451 when they initiated PSPS events in 2019. Worse yet, D.21-06-014 provides financial incentives to utilities for simply improving their conduct in PSPS events²¹; it does not even try to compel compliance – it merely hopes that improvements will happen. By "incentivizing" compliance rather than enforcing it, D.21-06-014 turns the Commission's entire enforcement program on its head and lets utilities choose whether they will comply with the Public Utilities Code, and if so, the extent to which they will comply. Because of the appalling deference that the Commission has persistently shown to SCE since the Fall of 2019, Acton residents are now in the untenable position of being grateful when their power is *not* cut off. The absurd situation created by the Commission's failure to hold utilities accountable flies in the face of the entire legislative intent behind the Public Utilities Code which affirms "Reliable electric service is of utmost importance to the **safety, health, and welfare of the state's citizenry and economy**"²².

The Commission now has a fresh opportunity to rectify its previous errors and hold utilities accountable by conducting a "reasonableness review" of SCE's most recent PSPS event. As we have shown above, there is nothing "reasonable" in a 25 mph or less windspeed threshold or a 39 mph or less wind gust threshold or the continued existence of infrastructure that has "a history of local circuit outages at lower wind speeds"; these circumstances violate General Order 95 because they are driven by either structural deficiencies or infrastructure that is not configured to accommodate local conditions. What makes the power shutoff that occurred in Acton over the Thanksgiving holiday

²¹ D.21-06-014 at 60 and Conclusion of Law #16.

²² §330 of the Public Utilities Code.

even more unreasonable is that wind levels on the Acton portion of the Sand Canyon circuit never even exceeded SCE's paltry thresholds, and had SCE had just sectionalized the Briggs Road portion of Segment 7 of the Sand Canyon circuit, our residents on Segment 7 would have lost power for just a few hours the night before Thanksgiving and then been re-energized at the same time that Segment 6 was re-energized. Instead, Acton residents lost power for two days. This, coupled with the fact that SCE did not properly consider the documented public safety risks posed by the power shutoff initiated over Thanksgiving holiday and the fact that it grossly overstated the wildfire risk that its power shutoff avoided, renders the entire PSPS event completely unreasonable. Given these factors, a "reasonableness review" of SCE's most recent PSPS event by the Commission is warranted.

Respectfully submitted;

/s/ Jacqueline Ayer

Jacqueline Ayer

On behalf of The Acton Town Council

December 27, 2021

Attachment 1

Weather Data from SCE's "Soledad Canyon Ranch" Weather Station in Southwest Acton.

SCE SOLEDAD CANYON RANCH WEATHER STATION IN SOUTHWEST ACTON										
# The provisional data available here are intended for diverse user applications.										
# For data reqi review the information										
# available from the NCEI (https://www.ncdc.noaa.gov/customer-support/certification-data)										
# or consult a CCM (http://www.nicm.org).										
# STATION: SE677										
# STATION NAME: SCE Soledad Canyon Ranch										
# LATITUDE: 34.43807			Max sustained winds:		20.56 Occurred on November 25 at 12:50 PM					
# LONGITUDE: -118.26327			Max wind gusts:		33.46 Occurred on November 25 at 12:40 PM					
# ELEVATION [ft]: 2265										
# STATE: CA										
Station_ID	UTC time	Local Time	Temp ° F	RH %	wind speed		wind gust		dew point ° F	
					knots	mph	knots	mph		
SE677	2021-11-24T20:00:00Z	12:00 PM	62.17	15.39	12.52	14.41	22.85	26.3	14.46	
SE677	2021-11-24T20:10:00Z	12:10 PM	61.86	15.51	13.23	15.22	25.97	29.89	14.38	
SE677	2021-11-24T20:20:00Z	12:20 PM	62.43	15.42	13.42	15.44	25.21	29.01	14.71	
SE677	2021-11-24T20:30:00Z	12:30 PM	62.8	15.47	10.5	12.08	22.92	26.38	15.09	
SE677	2021-11-24T20:40:00Z	12:40 PM	62.9	15.35	11.48	13.21	25.78	29.67	14.99	
SE677	2021-11-24T20:50:00Z	12:50 PM	63.09	15.03	11.75	13.52	20.57	23.67	14.67	
SE677	2021-11-24T21:00:00Z	1:00 PM	62.87	14.94	11.53	13.27	19.11	21.99	14.35	
SE677	2021-11-24T21:10:00Z	1:10 PM	63.17	14.74	10.5	12.08	23.49	27.03	14.29	
SE677	2021-11-24T21:20:00Z	1:20 PM	63.69	14.45	9.1	10.47	17.14	19.72	14.26	
SE677	2021-11-24T21:30:00Z	1:30 PM	63.76	14.12	8.95	10.3	17.14	19.72	13.8	
SE677	2021-11-24T21:40:00Z	1:40 PM	63.71	13.87	12.28	14.13	22.22	25.57	13.35	
SE677	2021-11-24T21:50:00Z	1:50 PM	63.72	13.73	13.38	15.4	20.76	23.89	13.13	
SE677	2021-11-24T22:00:00Z	2:00 PM	63.8	13.5	14.03	16.15	24.51	28.21	12.82	
SE677	2021-11-24T22:10:00Z	2:10 PM	63.8	13.14	14.38	16.55	23.62	27.18	12.22	
SE677	2021-11-24T22:20:00Z	2:20 PM	63.52	13.13	15.51	17.85	28.82	33.17	11.97	
SE677	2021-11-24T22:30:00Z	2:30 PM	63.51	13.01	15.22	17.51	23.31	26.82	11.76	
SE677	2021-11-24T22:40:00Z	2:40 PM	63.66	12.79	13.41	15.43	25.71	29.59	11.5	
SE677	2021-11-24T22:50:00Z	2:50 PM	63.28	12.61	15.21	17.5	25.78	29.67	10.89	
SE677	2021-11-24T23:00:00Z	3:00 PM	63.32	12.41	14.95	17.2	26.16	30.1	10.56	
SE677	2021-11-24T23:10:00Z	3:10 PM	63.41	12.39	12.73	14.65	23.31	26.82	10.6	
SE677	2021-11-24T23:20:00Z	3:20 PM	63.21	12.53	13.76	15.83	23.24	26.74	10.69	
SE677	2021-11-24T23:30:00Z	3:30 PM	63.01	12.73	12.24	14.09	20.95	24.11	10.88	
SE677	2021-11-24T23:40:00Z	3:40 PM	62.77	12.34	13.93	16.03	20.76	23.89	10	
SE677	2021-11-24T23:50:00Z	3:50 PM	62.41	12.15	13.82	15.9	22.48	25.87	9.37	
SE677	2021-11-25T00:00:00Z	4:00 PM	61.96	12.18	10.52	12.11	19.3	22.21	9.07	
SE677	2021-11-25T00:10:00Z	4:10 PM	61.45	12.16	7.32	8.42	13.65	15.71	8.63	
SE677	2021-11-25T00:20:00Z	4:20 PM	60.84	12.42	5.22	6.01	9.52	10.96	8.61	
SE677	2021-11-25T00:30:00Z	4:30 PM	60.49	12.71	6.34	7.3	14.16	16.3	8.84	
SE677	2021-11-25T00:40:00Z	4:40 PM	60.16	13.03	5.35	6.16	11.75	13.52	9.12	
SE677	2021-11-25T00:50:00Z	4:50 PM	59.67	13.28	6.97	8.02	16.7	19.22	9.15	
SE677	2021-11-25T01:00:00Z	5:00 PM	58.54	13.83	3.34	3.84	7.43	8.55	9.14	
SE677	2021-11-25T01:10:00Z	5:10 PM	57.97	14.3	3.59	4.13	7.11	8.18	9.42	
SE677	2021-11-25T01:20:00Z	5:20 PM	58.45	14.2	6.81	7.84	12.25	14.1	9.65	
SE677	2021-11-25T01:30:00Z	5:30 PM	58.14	14.34	3.93	4.52	6.86	7.89	9.62	
SE677	2021-11-25T01:40:00Z	5:40 PM	56.99	14.91	2.72	3.13	4.89	5.63	9.55	
SE677	2021-11-25T01:50:00Z	5:50 PM	56.59	14.62	5.34	6.15	13.02	14.98	8.79	
SE677	2021-11-25T02:00:00Z	6:00 PM	57	13.84	4.54	5.22	9.65	11.11	7.92	
SE677	2021-11-25T02:10:00Z	6:10 PM	56.11	14.23	4.49	5.17	8.76	10.08	7.81	
SE677	2021-11-25T02:20:00Z	6:20 PM	55.48	14.56	3.28	3.77	5.71	6.57	7.8	
SE677	2021-11-25T02:30:00Z	6:30 PM	55.72	14.48	5.58	6.42	10.73	12.35	7.88	
SE677	2021-11-25T02:40:00Z	6:40 PM	57.28	13.72	8.52	9.8	14.98	17.24	7.95	
SE677	2021-11-25T02:50:00Z	6:50 PM	57.02	13.98	7.37	8.48	13.78	15.86	8.15	
SE677	2021-11-25T03:00:00Z	7:00 PM	56.49	14.3	3.5	4.03	10.1	11.62	8.22	
SE677	2021-11-25T03:10:00Z	7:10 PM	55.82	14.62	4.78	5.5	15.36	17.68	8.17	
SE677	2021-11-25T03:20:00Z	7:20 PM	56.52	14.24	4.86	5.59	10.54	12.13	8.16	
SE677	2021-11-25T03:30:00Z	7:30 PM	56.76	14.18	5.02	5.78	9.78	11.25	8.26	
SE677	2021-11-25T03:40:00Z	7:40 PM	56.48	14.31	4.33	4.98	8.12	9.34	8.23	
SE677	2021-11-25T03:50:00Z	7:50 PM	56.56	14.22	4.32	4.97	13.33	15.34	8.16	
SE677	2021-11-25T04:00:00Z	8:00 PM	56.73	14.2	4.73	5.44	11.75	13.52	8.26	
SE677	2021-11-25T04:10:00Z	8:10 PM	56.38	14.36	2.69	3.1	5.84	6.72	8.23	
SE677	2021-11-25T04:20:00Z	8:20 PM	54.82	15.17	2.69	3.1	6.73	7.74	8.17	
SE677	2021-11-25T04:30:00Z	8:30 PM	54.39	15.53	2.94	3.38	7.93	9.13	8.34	
SE677	2021-11-25T04:40:00Z	8:40 PM	56.25	14.61	5.37	6.18	13.02	14.98	8.5	
SE677	2021-11-25T04:50:00Z	8:50 PM	56.92	14.17	6.8	7.83	14.03	16.15	8.37	
SE677	2021-11-25T05:00:00Z	9:00 PM	57.22	14.03	7.34	8.45	14.29	16.44	8.39	
SE677	2021-11-25T05:10:00Z	9:10 PM	57.15	14.01	8.57	9.86	17.01	19.57	8.31	
SE677	2021-11-25T05:20:00Z	9:20 PM	56.86	14.08	5.59	6.43	12.5	14.38	8.18	
SE677	2021-11-25T05:30:00Z	9:30 PM	56.55	14.27	7.64	8.79	14.29	16.44	8.23	
SE677	2021-11-25T05:40:00Z	9:40 PM	56.83	14.03	9.05	10.41	17.84	20.53	8.08	
SE677	2021-11-25T05:50:00Z	9:50 PM	56.79	13.99	7.15	8.23	14.35	16.51	7.99	
SE677	2021-11-25T06:00:00Z	10:00 PM	56.53	14.11	7.16	8.24	13.78	15.86	7.96	

SE677	2021-11-25T05:50:00Z	9:50 PM	56.79	13.99	7.15	8.23	14.35	16.51	7.99
SE677	2021-11-25T06:00:00Z	10:00 PM	56.53	14.11	7.16	8.24	13.78	15.86	7.96
SE677	2021-11-25T06:10:00Z	10:10 PM	56.4	14.18	6.86	7.89	11.24	12.93	7.97
SE677	2021-11-25T06:20:00Z	10:20 PM	56.54	14.06	8.26	9.51	15.17	17.46	7.89
SE677	2021-11-25T06:30:00Z	10:30 PM	55.88	14.42	6.44	7.41	12.77	14.7	7.92
SE677	2021-11-25T06:40:00Z	10:40 PM	56.12	14.35	9.23	10.62	16.38	18.85	8
SE677	2021-11-25T06:50:00Z	10:50 PM	55.69	14.6	8.05	9.26	17.9	20.6	8.03
SE677	2021-11-25T07:00:00Z	11:00 PM	56.03	14.21	8.95	10.3	16.07	18.49	7.72
SE677	2021-11-25T07:10:00Z	11:10 PM	55.89	14.14	6.27	7.22	12.83	14.76	7.49
SE677	2021-11-25T07:20:00Z	11:20 PM	55.73	14.15	7.41	8.53	16.82	19.36	7.38
SE677	2021-11-25T07:30:00Z	11:30 PM	55.94	13.92	7.79	8.96	17.65	20.31	7.19
SE677	2021-11-25T07:40:00Z	11:40 PM	55.87	13.87	11.04	12.7	22.92	26.38	7.06
SE677	2021-11-25T07:50:00Z	11:50 PM	55.8	13.72	9.24	10.63	16.19	18.63	6.77
SE677	2021-11-25T08:00:00Z	12:00 AM	55.59	13.72	9.47	10.9	22.66	26.08	6.6
SE677	2021-11-25T08:10:00Z	12:10 AM	55.52	13.65	10.45	12.03	20.26	23.31	6.43
SE677	2021-11-25T08:20:00Z	12:20 AM	55.45	13.66	7.85	9.03	15.55	17.89	6.39
SE677	2021-11-25T08:30:00Z	12:30 AM	55.38	13.67	8.92	10.26	17.59	20.24	6.35
SE677	2021-11-25T08:40:00Z	12:40 AM	55.56	13.59	9.83	11.31	18.86	21.7	6.37
SE677	2021-11-25T08:50:00Z	12:50 AM	55.3	13.67	8.41	9.68	16.44	18.92	6.29
SE677	2021-11-25T09:00:00Z	1:00 AM	55.19	13.59	9.18	10.56	17.34	19.95	6.07
SE677	2021-11-25T09:10:00Z	1:10 AM	55.53	13.28	10.96	12.61	18.73	21.55	5.84
SE677	2021-11-25T09:20:00Z	1:20 AM	55.46	13.23	11.54	13.28	19.55	22.5	5.7
SE677	2021-11-25T09:30:00Z	1:30 AM	55.07	13.48	11.94	13.74	21.39	24.62	5.8
SE677	2021-11-25T09:40:00Z	1:40 AM	54.87	13.67	13.03	14.99	24.51	28.21	5.94
SE677	2021-11-25T09:50:00Z	1:50 AM	54.69	13.75	12.63	14.53	20.26	23.31	5.92
SE677	2021-11-25T10:00:00Z	2:00 AM	54.65	13.56	10.51	12.09	19.81	22.8	5.59
SE677	2021-11-25T10:10:00Z	2:10 AM	54.95	13.23	14.45	16.63	25.08	28.86	5.3
SE677	2021-11-25T10:20:00Z	2:20 AM	54.9	13.21	15.02	17.28	24.38	28.06	5.22
SE677	2021-11-25T10:30:00Z	2:30 AM	55.13	12.9	16.15	18.59	27.81	32	4.9
SE677	2021-11-25T10:40:00Z	2:40 AM	54.55	13.22	11.71	13.48	20.7	23.82	4.96
SE677	2021-11-25T10:50:00Z	2:50 AM	54.61	13.14	13.83	15.92	28.76	33.1	4.88
SE677	2021-11-25T11:00:00Z	3:00 AM	54.91	12.85	16.33	18.79	24	27.62	4.64
SE677	2021-11-25T11:10:00Z	3:10 AM	54.95	12.56	13.32	15.33	23.18	26.68	4.18
SE677	2021-11-25T11:20:00Z	3:20 AM	55.13	12.06	13.16	15.14	22.73	26.16	3.45
SE677	2021-11-25T11:30:00Z	3:30 AM	54.79	12.37	12.83	14.76	20.83	23.97	3.73
SE677	2021-11-25T11:40:00Z	3:40 AM	54.63	12.65	13.99	16.1	28.38	32.66	4.08
SE677	2021-11-25T11:50:00Z	3:50 AM	54.76	12.62	16.29	18.75	28.44	32.73	4.13
SE677	2021-11-25T12:00:00Z	4:00 AM	54.29	12.91	13.84	15.93	20.45	23.53	4.24
SE677	2021-11-25T12:10:00Z	4:10 AM	54.11	13.03	17.08	19.66	28.51	32.81	4.3
SE677	2021-11-25T12:20:00Z	4:20 AM	54.12	12.99	16	18.41	26.86	30.91	4.24
SE677	2021-11-25T12:30:00Z	4:30 AM	53.95	13.01	14.77	17	25.97	29.89	4.14
SE677	2021-11-25T12:40:00Z	4:40 AM	53.6	13.12	13.12	15.1	20.57	23.67	4.04
SE677	2021-11-25T12:50:00Z	4:50 AM	53.39	13.29	15.1	17.38	27.49	31.63	4.15
SE677	2021-11-25T13:00:00Z	5:00 AM	53.18	13.36	14.36	16.53	26.03	29.95	4.09
SE677	2021-11-25T13:10:00Z	5:10 AM	53.4	13.08	13.33	15.34	22.54	25.94	3.81
SE677	2021-11-25T13:20:00Z	5:20 AM	53.39	12.96	11.49	13.22	19.49	22.43	3.61
SE677	2021-11-25T13:30:00Z	5:30 AM	53.29	12.94	9.35	10.76	14.92	17.17	3.5
SE677	2021-11-25T13:40:00Z	5:40 AM	53.15	12.91	8.69	10	15.3	17.61	3.34
SE677	2021-11-25T13:50:00Z	5:50 AM	53.34	12.75	10.33	11.89	19.11	21.99	3.22
SE677	2021-11-25T14:00:00Z	6:00 AM	53.35	12.76	11.16	12.84	18.6	21.4	3.25
SE677	2021-11-25T14:10:00Z	6:10 AM	53.24	12.83	10.97	12.62	16.95	19.51	3.27
SE677	2021-11-25T14:20:00Z	6:20 AM	53.34	12.82	11.35	13.06	22.92	26.38	3.34
SE677	2021-11-25T14:30:00Z	6:30 AM	53.22	12.81	11.09	12.76	24	27.62	3.23
SE677	2021-11-25T14:40:00Z	6:40 AM	52.87	12.95	9.34	10.75	18.54	21.34	3.18
SE677	2021-11-25T14:50:00Z	6:50 AM	52.85	13.03	8.33	9.59	19.87	22.87	3.29
SE677	2021-11-25T15:00:00Z	7:00 AM	52.57	13.29	9.17	10.55	17.65	20.31	3.49
SE677	2021-11-25T15:10:00Z	7:10 AM	52.7	13.13	9.33	10.74	21.78	25.06	3.34
SE677	2021-11-25T15:20:00Z	7:20 AM	52.86	13.01	9.26	10.66	18.09	20.82	3.27
SE677	2021-11-25T15:30:00Z	7:30 AM	53.3	12.82	10.26	11.81	20.45	23.53	3.31
SE677	2021-11-25T15:40:00Z	7:40 AM	53.68	12.65	9.81	11.29	17.59	20.24	3.32
SE677	2021-11-25T15:50:00Z	7:50 AM	53.9	12.54	9.96	11.46	20.95	24.11	3.31
SE677	2021-11-25T16:00:00Z	8:00 AM	54.27	12.36	11.28	12.98	21.08	24.26	3.3
SE677	2021-11-25T16:10:00Z	8:10 AM	54.22	12.54	11.42	13.14	21.91	25.21	3.57
SE677	2021-11-25T16:20:00Z	8:20 AM	54.41	12.51	11.72	13.49	21.59	24.85	3.67
SE677	2021-11-25T16:30:00Z	8:30 AM	54.74	12.52	10.91	12.56	20	23.02	3.94
SE677	2021-11-25T16:40:00Z	8:40 AM	55.21	12.67	9.72	11.19	19.87	22.87	4.57
SE677	2021-11-25T16:50:00Z	8:50 AM	55.62	12.74	11.56	13.3	27.49	31.63	5.02
SE677	2021-11-25T17:00:00Z	9:00 AM	55.89	12.69	12.13	13.96	22.66	26.08	5.15
SE677	2021-11-25T17:10:00Z	9:10 AM	56.25	12.71	10.84	12.47	22.66	26.08	5.47
SE677	2021-11-25T17:20:00Z	9:20 AM	56.45	12.57	12.8	14.73	20.7	23.82	5.39
SE677	2021-11-25T17:30:00Z	9:30 AM	57.25	12.32	10.73	12.35	21.33	24.55	5.59
SE677	2021-11-25T17:40:00Z	9:40 AM	58.14	11.7	11.33	13.04	23.62	27.18	5.18
SE677	2021-11-25T17:50:00Z	9:50 AM	58.46	11.38	12.04	13.86	20.45	23.53	4.84
SE677	2021-11-25T18:00:00Z	10:00 AM	58.93	11.03	11.56	13.3	21.46	24.7	4.53

SE677	2021-11-25T18:00:00Z	10:00 AM	58.93	11.03	11.56	13.3	21.46	24.7	4.53
SE677	2021-11-25T18:10:00Z	10:10 AM	59.52	10.46	10.84	12.47	19.49	22.43	3.86
SE677	2021-11-25T18:20:00Z	10:20 AM	60.35	10.42	11.51	13.25	23.87	27.47	4.43
SE677	2021-11-25T18:30:00Z	10:30 AM	59.69	10.27	12.92	14.87	22.92	26.38	3.6
SE677	2021-11-25T18:40:00Z	10:40 AM	59.05	11.02	14.03	16.15	25.21	29.01	4.61
SE677	2021-11-25T18:50:00Z	10:50 AM	58.91	11.32	15.75	18.12	26.92	30.98	5.08
SE677	2021-11-25T19:00:00Z	11:00 AM	59.58	11.03	12.23	14.07	22.1	25.43	5.04
SE677	2021-11-25T19:10:00Z	11:10 AM	60.22	10.4	12.3	14.15	22.22	25.57	4.28
SE677	2021-11-25T19:20:00Z	11:20 AM	60.35	10.14	11.64	13.4	21.78	25.06	3.84
SE677	2021-11-25T19:30:00Z	11:30 AM	60.8	9.74	11.11	12.79	23.11	26.59	3.34
SE677	2021-11-25T19:40:00Z	11:40 AM	60.54	9.81	11.97	13.77	20.83	23.97	3.29
SE677	2021-11-25T19:50:00Z	11:50 AM	60.79	9.48	13.51	15.55	23.68	27.25	2.75
SE677	2021-11-25T20:00:00Z	12:00 PM	61.39	8.98	14.12	16.25	28.38	32.66	2.07
SE677	2021-11-25T20:10:00Z	12:10 PM	62.04	8.55	12.78	14.71	28.13	32.37	1.53
SE677	2021-11-25T20:20:00Z	12:20 PM	61.72	8.54	16.07	18.49	25.4	29.23	1.26
SE677	2021-11-25T20:30:00Z	12:30 PM	61.9	8.56	15.52	17.86	24.96	28.72	1.45
SE677	2021-11-25T20:40:00Z	12:40 PM	61.88	8.5	16.21	18.65	29.08	33.46	1.29
SE677	2021-11-25T20:50:00Z	12:50 PM	61.89	8.51	17.87	20.56	28.51	32.81	1.32
SE677	2021-11-25T21:00:00Z	1:00 PM	62.12	8.38	15.83	18.22	25.71	29.59	1.17
SE677	2021-11-25T21:10:00Z	1:10 PM	62.21	8.2	14.03	16.15	26.23	30.18	0.78
SE677	2021-11-25T21:20:00Z	1:20 PM	62.45	8.26	14.36	16.53	25.27	29.08	1.12
SE677	2021-11-25T21:30:00Z	1:30 PM	62.49	8.38	13.95	16.05	23.18	26.68	1.45
SE677	2021-11-25T21:40:00Z	1:40 PM	62.57	8.3	13.52	15.56	21.27	24.48	1.31
SE677	2021-11-25T21:50:00Z	1:50 PM	62.46	8.28	11.57	13.31	20	23.02	1.18
SE677	2021-11-25T22:00:00Z	2:00 PM	62.61	8.22	14.24	16.39	22.41	25.79	1.14
SE677	2021-11-25T22:10:00Z	2:10 PM	62.3	8.2	14.9	17.15	28.38	32.66	0.85
SE677	2021-11-25T22:20:00Z	2:20 PM	62.85	8.23	11.92	13.72	20.45	23.53	1.35
SE677	2021-11-25T22:30:00Z	2:30 PM	63.05	8.13	13.11	15.09	22.48	25.87	1.24
SE677	2021-11-25T22:40:00Z	2:40 PM	63.24		12.43	14.3	23.49	27.03	
SE677	2021-11-25T22:50:00Z	2:50 PM	63.28	7.94	12.88	14.82	22.16	25.5	0.92
SE677	2021-11-25T23:00:00Z	3:00 PM	63.39	7.84	12.39	14.26	20.83	23.97	0.74
SE677	2021-11-25T23:10:00Z	3:10 PM	63.43	7.69	15.13	17.41	25.21	29.01	0.37
SE677	2021-11-25T23:20:00Z	3:20 PM	63.61	7.65	14.04	16.16	22.79	26.23	0.39
SE677	2021-11-25T23:30:00Z	3:30 PM	63.57	7.57	10.72	12.34	16.63	19.14	0.14
SE677	2021-11-25T23:40:00Z	3:40 PM	63.59	7.54	11.32	13.03	22.03	25.35	0.08
SE677	2021-11-25T23:50:00Z	3:50 PM	63.42	7.6	7.73	8.9	13.9	16	0.11
SE677	2021-11-26T00:00:00Z	4:00 PM	62.98	7.72	7.38	8.49	15.81	18.19	0.11
SE677	2021-11-26T00:10:00Z	4:10 PM	62.35	7.87	8.19	9.42	15.55	17.89	0.03
SE677	2021-11-26T00:20:00Z	4:20 PM	62.16	7.81	8.19	9.42	15.88	18.27	-0.27
SE677	2021-11-26T00:30:00Z	4:30 PM	61.61	7.96	6.94	7.99	13.46	15.49	-0.29
SE677	2021-11-26T00:40:00Z	4:40 PM	61.1	8.02	5.19	5.97	10.79	12.42	-0.52
SE677	2021-11-26T00:50:00Z	4:50 PM	60.55	8.08	3.24	3.73	8.57	9.86	-0.78
SE677	2021-11-26T01:00:00Z	5:00 PM	60.49	8.04	4.08	4.7	9.39	10.81	-0.93
SE677	2021-11-26T01:10:00Z	5:10 PM	60	8.13	3.58	4.12	7.74	8.91	-1.07
SE677	2021-11-26T01:20:00Z	5:20 PM	59.92	8.13	2.98	3.43	6.41	7.38	-1.13
SE677	2021-11-26T01:30:00Z	5:30 PM	60.22	8.05	5.35	6.16	11.94	13.74	-1.11
SE677	2021-11-26T01:40:00Z	5:40 PM	60.65	7.93	6.09	7.01	12.5	14.38	-1.09
SE677	2021-11-26T01:50:00Z	5:50 PM	60.66	7.87	5.83	6.71	15.24	17.54	-1.24
SE677	2021-11-26T02:00:00Z	6:00 PM	60.57	7.85	5.07	5.83	11.5	13.23	-1.36
SE677	2021-11-26T02:10:00Z	6:10 PM	60.64	7.76	4.63	5.33	11.11	12.79	-1.55
SE677	2021-11-26T02:20:00Z	6:20 PM	60.8	7.77	5.22	6.01	10.6	12.2	-1.4
SE677	2021-11-26T02:30:00Z	6:30 PM	60.8	7.7	4.44	5.11	12	13.81	-1.59
SE677	2021-11-26T02:40:00Z	6:40 PM	60.81	7.75	4.43	5.1	8.64	9.94	-1.45
SE677	2021-11-26T02:50:00Z	6:50 PM	60.87	7.76	5.46	6.28	11.18	12.87	-1.38
SE677	2021-11-26T03:00:00Z	7:00 PM	60.86	7.78	5.12	5.89	10.48	12.06	-1.33
SE677	2021-11-26T03:10:00Z	7:10 PM	60.41	7.89	4.5	5.18	9.58	11.02	-1.38
SE677	2021-11-26T03:20:00Z	7:20 PM	60.57	7.86	5.36	6.17	13.21	15.2	-1.34
SE677	2021-11-26T03:30:00Z	7:30 PM	60.46	7.9	4.57	5.26	11.5	13.23	-1.31
SE677	2021-11-26T03:40:00Z	7:40 PM	60.27	7.99	3.99	4.59	9.08	10.45	-1.22
SE677	2021-11-26T03:50:00Z	7:50 PM	59.89	8.12	4.51	5.19	9.91	11.4	-1.18
SE677	2021-11-26T04:00:00Z	8:00 PM	60.22	8.07	4.82	5.55	9.2	10.59	-1.06
SE677	2021-11-26T04:10:00Z	8:10 PM	60.04	8.18	4.36	5.02	9.39	10.81	-0.91
SE677	2021-11-26T04:20:00Z	8:20 PM	59.96	8.29	4.62	5.32	10.41	11.98	-0.69
SE677	2021-11-26T04:30:00Z	8:30 PM	60.36	8.33	5.75	6.62	16.13	18.56	-0.29
SE677	2021-11-26T04:40:00Z	8:40 PM	61.28	8.23	9.61	11.06	18.47	21.25	0.16
SE677	2021-11-26T04:50:00Z	8:50 PM	61.33	8.22	6.44	7.41	13.52	15.56	0.17
SE677	2021-11-26T05:00:00Z	9:00 PM	60.76	8.38	6.35	7.31	12.83	14.76	0.14
SE677	2021-11-26T05:10:00Z	9:10 PM	60.89	8.33	7.56	8.7	13.78	15.86	0.11
SE677	2021-11-26T05:20:00Z	9:20 PM	60.85	8.43	4.94	5.68	12.77	14.7	0.33
SE677	2021-11-26T05:30:00Z	9:30 PM	60.75	8.42	6.24	7.18	14.35	16.51	0.23
SE677	2021-11-26T05:40:00Z	9:40 PM	61.11	8.24	6.11	7.03	13.27	15.27	0.05
SE677	2021-11-26T05:50:00Z	9:50 PM	61	8.25	4.55	5.24	14.35	16.51	-0.01

SE677	2021-11-26T06:00:00Z	10:00 PM	60.1	8.46	3.56	4.1	9.39	10.81	-0.17
SE677	2021-11-26T06:10:00Z	10:10 PM	60.21	8.42	5.32	6.12	13.02	14.98	-0.18
SE677	2021-11-26T06:20:00Z	10:20 PM	60.89	8.28	6.37	7.33	15.55	17.89	-0.01
SE677	2021-11-26T06:30:00Z	10:30 PM	61.14	8.25	7.81	8.99	13.4	15.42	0.1
SE677	2021-11-26T06:40:00Z	10:40 PM	61.53	8.31	8.58	9.87	13.33	15.34	0.55
SE677	2021-11-26T06:50:00Z	10:50 PM	61.14	8.61	8.53	9.82	16.26	18.71	0.99
SE677	2021-11-26T07:00:00Z	11:00 PM	60.79	8.7	9.78	11.25	18.22	20.97	0.94
SE677	2021-11-26T07:10:00Z	11:10 PM	59.42	9.13	7.82	9	13.02	14.98	0.91
SE677	2021-11-26T07:20:00Z	11:20 PM	56.89	9.86	5.91	6.8	11.56	13.3	0.57
SE677	2021-11-26T07:30:00Z	11:30 PM	55.22	10.48	6.29	7.24	11.5	13.23	0.55
SE677	2021-11-26T07:40:00Z	11:40 PM	54.84	10.71	4.89	5.63	9.33	10.74	0.71
SE677	2021-11-26T07:50:00Z	11:50 PM	54.74	10.81	4.78	5.5	9.97	11.47	0.83
SE677	2021-11-26T08:00:00Z	12:00 AM	54.26	11	5	5.75	9.72	11.19	0.82
SE677	2021-11-26T08:10:00Z	12:10 AM	53.36	11.37	2.94	3.38	11.75	13.52	0.81
SE677	2021-11-26T08:20:00Z	12:20 AM	51.53	12.14	0.65	0.75	2.79	3.21	0.75
SE677	2021-11-26T08:30:00Z	12:30 AM	50.26	12.79	1.76	2.03	3.87	4.45	0.84
SE677	2021-11-26T08:40:00Z	12:40 AM	50.74	12.64	2.64	3.04	7.37	8.48	0.97
SE677	2021-11-26T08:50:00Z	12:50 AM	51.38	12.37	2.67	3.07	6.67	7.68	1.02
SE677	2021-11-26T09:00:00Z	1:00 AM	51.48	12.27	3.3	3.8	6.6	7.6	0.93
SE677	2021-11-26T09:10:00Z	1:10 AM	51.71	12.18	4.69	5.4	11.68	13.44	0.96
SE677	2021-11-26T09:20:00Z	1:20 AM	51.64	12.21	4.82	5.55	11.11	12.79	0.95
SE677	2021-11-26T09:30:00Z	1:30 AM	52.17	11.87	5.71	6.57	15.43	17.76	0.78
SE677	2021-11-26T09:40:00Z	1:40 AM	52.47	11.66	5.52	6.35	13.52	15.56	0.64
SE677	2021-11-26T09:50:00Z	1:50 AM	52.38	11.67	4.44	5.11	11.43	13.15	0.59
SE677	2021-11-26T10:00:00Z	2:00 AM	52.22	11.72	4.39	5.05	12	13.81	0.55
SE677	2021-11-26T10:10:00Z	2:10 AM	52.43	11.67	4.13	4.75	10.73	12.35	0.63
SE677	2021-11-26T10:20:00Z	2:20 AM	52.31	11.76	2.95	3.39	7.55	8.69	0.69
SE677	2021-11-26T10:30:00Z	2:30 AM	52.58	11.69	5.46	6.28	10.92	12.57	0.78
SE677	2021-11-26T10:40:00Z	2:40 AM	52.91	11.63	4.45	5.12	11.87	13.66	0.93
SE677	2021-11-26T10:50:00Z	2:50 AM	53.12	11.57	4.32	4.97	9.97	11.47	0.99
SE677	2021-11-26T11:00:00Z	3:00 AM	53.47	11.49	5.07	5.83	11.68	13.44	1.12
SE677	2021-11-26T11:10:00Z	3:10 AM	53.69	11.44	5.42	6.24	12.57	14.47	1.2
SE677	2021-11-26T11:20:00Z	3:20 AM	53.66	11.54	5.28	6.08	10.92	12.57	1.36
SE677	2021-11-26T11:30:00Z	3:30 AM	53.68	11.68	4.83	5.56	9.85	11.34	1.63
SE677	2021-11-26T11:40:00Z	3:40 AM	54.23	11.49	4.85	5.58	10.1	11.62	1.72
SE677	2021-11-26T11:50:00Z	3:50 AM	53.91	11.58	4.79	5.51	11.75	13.52	1.63
SE677	2021-11-26T12:00:00Z	4:00 AM	53.45	11.79	4.47	5.14	8.7	10.01	1.65
SE677	2021-11-26T12:10:00Z	4:10 AM	53.43	11.92	3.22	3.71	6.92	7.96	1.86
SE677	2021-11-26T12:20:00Z	4:20 AM	51.91	12.58	1.72	1.98	3.75	4.32	1.8
SE677	2021-11-26T12:30:00Z	4:30 AM	49.72	13.59	0.77	0.89	1.78	2.05	1.69
SE677	2021-11-26T12:40:00Z	4:40 AM	49.63	13.77	1.59	1.83	4.13	4.75	1.89
SE677	2021-11-26T12:50:00Z	4:50 AM	49.29	14.33	1.85	2.13	3.68	4.23	2.47
SE677	2021-11-26T13:00:00Z	5:00 AM	49.6	14.14	1.84	2.12	4.64	5.34	2.43
SE677	2021-11-26T13:10:00Z	5:10 AM	50.83	13.4	0.93	1.07	3.43	3.95	2.28
SE677	2021-11-26T13:20:00Z	5:20 AM	51.55	12.96	1.11	1.28	3.68	4.23	2.14
SE677	2021-11-26T13:30:00Z	5:30 AM	50.4	13.44	0.72	0.83	2.98	3.43	2
SE677	2021-11-26T13:40:00Z	5:40 AM	49.25	13.9	0.95	1.09	2.92	3.36	1.79
SE677	2021-11-26T13:50:00Z	5:50 AM	48.28	14.37	1.27	1.46	4.13	4.75	1.71
SE677	2021-11-26T14:00:00Z	6:00 AM	48.1	14.49	0.78	0.9	2.98	3.43	1.74
SE677	2021-11-26T14:10:00Z	6:10 AM	49.57	13.5	2.35	2.7	8.38	9.64	1.43
SE677	2021-11-26T14:20:00Z	6:20 AM	52.64	11.62	3.66	4.21	11.18	12.87	0.7
SE677	2021-11-26T14:30:00Z	6:30 AM	53.36	11.16	6.86	7.89	15.81	18.19	0.42
SE677	2021-11-26T14:40:00Z	6:40 AM	53.73	10.95	5.84	6.72	15.3	17.61	0.31
SE677	2021-11-26T14:50:00Z	6:50 AM	53.18	11.09	7.66	8.81	14.54	16.73	0.15
SE677	2021-11-26T15:00:00Z	7:00 AM	52.78	11.13	7.31	8.41	13.02	14.98	-0.09
SE677	2021-11-26T15:10:00Z	7:10 AM	54.37	10.26	6.82	7.85	12.06	13.88	-0.55
SE677	2021-11-26T15:20:00Z	7:20 AM	56.21	9.43	5.43	6.25	9.39	10.81	-0.89
SE677	2021-11-26T15:30:00Z	7:30 AM	56.93	9.18	3.05	3.51	7.49	8.62	-0.89
SE677	2021-11-26T15:40:00Z	7:40 AM	58	8.87	2.38	2.74	7.49	8.62	-0.78
SE677	2021-11-26T15:50:00Z	7:50 AM	57.16	9.74	2.3	2.65	4.83	5.56	0.52
SE677	2021-11-26T16:00:00Z	8:00 AM	58.53	9.55	3.31	3.81	5.78	6.65	1.17
SE677	2021-11-26T16:10:00Z	8:10 AM	60.14	9.09	3.69	4.25	9.39	10.81	1.37
SE677	2021-11-26T16:20:00Z	8:20 AM	60.55	8.54	5.74	6.61	10.35	11.91	0.37
SE677	2021-11-26T16:30:00Z	8:30 AM	60.53	8.8	3.69	4.25	7.43	8.55	0.98
SE677	2021-11-26T16:40:00Z	8:40 AM	58.86	9.3	5.83	6.71	11.04	12.7	0.86
SE677	2021-11-26T16:50:00Z	8:50 AM	57.92	9.55	3.53	4.06	8.7	10.01	0.7
SE677	2021-11-26T17:00:00Z	9:00 AM	57.24	9.69	4.39	5.05	11.56	13.3	0.48
SE677	2021-11-26T17:10:00Z	9:10 AM	57.03	9.9	4.64	5.34	13.52	15.56	0.76
SE677	2021-11-26T17:20:00Z	9:20 AM	56.95	10.05	3.49	4.02	11.94	13.74	1.02
SE677	2021-11-26T17:30:00Z	9:30 AM	57.18	10.05	3.35	3.86	9.33	10.74	1.2
SE677	2021-11-26T17:40:00Z	9:40 AM	56.82	10.41	3.73	4.29	13.27	15.27	1.66
SE677	2021-11-26T17:50:00Z	9:50 AM	57.23	10.2	4.54	5.22	14.67	16.88	1.55

SE677	2021-11-26T17:50:00Z	9:50 AM	57.23	10.2	4.54	5.22	14.67	16.88	1.55
SE677	2021-11-26T18:00:00Z	10:00 AM	59.31	9.91	2.66	3.06	9.08	10.45	2.55
SE677	2021-11-26T18:10:00Z	10:10 AM	59.95	9.18	3.95	4.55	9.78	11.25	1.43
SE677	2021-11-26T18:20:00Z	10:20 AM	60.34	9.36	2.95	3.39	8.57	9.86	2.14
SE677	2021-11-26T18:30:00Z	10:30 AM	60.93	9.27	3.81	4.38	12.7	14.61	2.39
SE677	2021-11-26T18:40:00Z	10:40 AM	61.25	9.09	7.55	8.69	14.61	16.81	2.22
SE677	2021-11-26T18:50:00Z	10:50 AM	61.6	9.06	5.52	6.35	11.31	13.02	2.42
SE677	2021-11-26T19:00:00Z	11:00 AM	61.78	9.17	4.5	5.18	11.68	13.44	2.81
SE677	2021-11-26T19:10:00Z	11:10 AM	61.77	9.34	5.34	6.15	15.81	18.19	3.19
SE677	2021-11-26T19:20:00Z	11:20 AM	62.14	9.33	4.46	5.13	11.94	13.74	3.45
SE677	2021-11-26T19:30:00Z	11:30 AM	62.6	9.41	4.13	4.75	15.55	17.89	3.99
SE677	2021-11-26T19:40:00Z	11:40 AM	62.84	9.35	4.08	4.7	13.02	14.98	4.04
SE677	2021-11-26T19:50:00Z	11:50 AM	64.05	8.81	6.71	7.72	20.32	23.38	3.7
SE677	2021-11-26T20:00:00Z	12:00 PM	64.79	8.49	6.1	7.02	12.06	13.88	3.48

Attachment 2.

Weather Data from SCE's "Mesa Grande" Weather Station up the Briggs Road Canyon in Agua Dulce.

SCE MESA GRANDE WEATHER STATION ON BRIGGS ROAD IN AGUA DULCE										
# The provisional data available here are intended for diverse user applications.										
# For data review the information										
# available from the NCEI (https://www.ncdc.noaa.gov/customer-support/certification-data)										
# or consult a CCM (http://www.nicm.org).										
# STATION: 027SE										
# STATION NAME: SCE Mesa Grande Rd										
# LATITUDE: 34.45793										
# LONGITUDE: -118.30035										
# ELEVATION [ft]: 2533										
# STATE: CA										
Station ID	UTC time	Local Time	Temp	RH	wind speed		wind gust		dew point	
			° F	%	knots	mph	knots	mph	° F	
027SE	2021-11-24T20:00:00Z	12:00 PM	59.97	16.48	23.23	26.73	34.92	40.19	14.21	
027SE	2021-11-24T20:10:00Z	12:10 PM	60.38	16.37	22.37	25.74	36.38	41.87	14.39	
027SE	2021-11-24T20:20:00Z	12:20 PM	60.87	16.22	16.72	19.24	25.46	29.3	14.59	
027SE	2021-11-24T20:30:00Z	12:30 PM	60.63	16.28	21.91	25.21	31.43	36.17	14.47	
027SE	2021-11-24T20:40:00Z	12:40 PM	60.53	16.27	19.27	22.18	32	36.82	14.38	
027SE	2021-11-24T20:50:00Z	12:50 PM	60.9	15.91	16.52	19.01	32.07	36.91	14.17	
027SE	2021-11-24T21:00:00Z	1:00 PM	60.73	15.73	16.19	18.63	28.63	32.95	13.78	
027SE	2021-11-24T21:10:00Z	1:10 PM	61.21	15.4	15.16	17.45	28.82	33.17	13.69	
027SE	2021-11-24T21:20:00Z	1:20 PM	61.48	15.08	15.19	17.48	29.46	33.9	13.44	
027SE	2021-11-24T21:30:00Z	1:30 PM	61.63	14.68	16.71	19.23	32.19	37.04	12.95	
027SE	2021-11-24T21:40:00Z	1:40 PM	61.7	14.28	17.89	20.59	31.05	35.73	12.39	
027SE	2021-11-24T21:50:00Z	1:50 PM	62.24	13.95	18.51	21.3	31.81	36.61	12.3	
027SE	2021-11-24T22:00:00Z	2:00 PM	62.3	13.81	18.79	21.62	33.14	38.14	12.13	
027SE	2021-11-24T22:10:00Z	2:10 PM	62.09	13.62	20.39	23.46	37.52	43.18	11.65	
027SE	2021-11-24T22:20:00Z	2:20 PM	62.03	13.66	20.05	23.07	33.14	38.14	11.67	
027SE	2021-11-24T22:30:00Z	2:30 PM	61.72	13.51	22.24	25.59	33.2	38.21	11.17	
027SE	2021-11-24T22:40:00Z	2:40 PM	61.5	13.61	19.83	22.82	32.7	37.63	11.16	
027SE	2021-11-24T22:50:00Z	2:50 PM	61.43	13.5	20.84	23.98	33.91	39.02	10.92	
027SE	2021-11-24T23:00:00Z	3:00 PM	61.11	13.35	20.38	23.45	29.08	33.46	10.42	
027SE	2021-11-24T23:10:00Z	3:10 PM	61.3	13.12	17.14	19.72	30.09	34.63	10.19	
027SE	2021-11-24T23:20:00Z	3:20 PM	61.32	13.08	17.08	19.66	29.15	33.55	10.13	
027SE	2021-11-24T23:30:00Z	3:30 PM	61.08	13.17	14.54	16.73	25.02	28.79	10.09	
027SE	2021-11-24T23:40:00Z	3:40 PM	61.05	13.14	18.23	20.98	33.14	38.14	10.02	
027SE	2021-11-24T23:50:00Z	3:50 PM	60.69	13.02	18.48	21.27	28.57	32.88	9.53	
027SE	2021-11-25T00:00:00Z	4:00 PM	60.45	12.84	20.07	23.1	30.54	35.14	9.03	
027SE	2021-11-25T00:10:00Z	4:10 PM	60.16	12.6	20.69	23.81	28	32.22	8.39	
027SE	2021-11-25T00:20:00Z	4:20 PM	59.93	12.61	17.95	20.66	25.9	29.81	8.22	
027SE	2021-11-25T00:30:00Z	4:30 PM	59.73	12.96	14.37	16.54	23.87	27.47	8.66	
027SE	2021-11-25T00:40:00Z	4:40 PM	59.49	13.24	12.72	14.64	21.2	24.4	8.94	
027SE	2021-11-25T00:50:00Z	4:50 PM	59.14	13.42	12.84	14.78	20.06	23.08	8.96	
027SE	2021-11-25T01:00:00Z	5:00 PM	58.92	13.7	14.26	16.41	23.24	26.74	9.24	
027SE	2021-11-25T01:10:00Z	5:10 PM	58.63	14.03	15.76	18.14	24.57	28.27	9.53	
027SE	2021-11-25T01:20:00Z	5:20 PM	58.43	14.07	17.48	20.12	25.78	29.67	9.43	
027SE	2021-11-25T01:30:00Z	5:30 PM	57.99	13.93	12.3	14.15	19.43	22.36	8.86	
027SE	2021-11-25T01:40:00Z	5:40 PM	57.69	13.6	14.24	16.39	23.75	27.33	8.09	
027SE	2021-11-25T01:50:00Z	5:50 PM	57.35	13.34	10.52	12.11	22.03	25.35	7.4	
027SE	2021-11-25T02:00:00Z	6:00 PM	57.1	13.25	6.49	7.47	22.66	26.08	7.05	
027SE	2021-11-25T02:10:00Z	6:10 PM	56.7	13.39	11.53	13.27	20.45	23.53	6.96	
027SE	2021-11-25T02:20:00Z	6:20 PM	56.43	13.58	15.77	18.15	27.24	31.35	7.05	
027SE	2021-11-25T02:30:00Z	6:30 PM	56.35	13.76	16.28	18.73	25.27	29.08	7.27	
027SE	2021-11-25T02:40:00Z	6:40 PM	55.81	14.22	13.14	15.12	23.56	27.11	7.55	
027SE	2021-11-25T02:50:00Z	6:50 PM	55.45	14.5	5.12	5.89	21.39	24.62	7.69	
027SE	2021-11-25T03:00:00Z	7:00 PM	55.38	14.67	14.42	16.59	23.49	27.03	7.89	
027SE	2021-11-25T03:10:00Z	7:10 PM	55.94	14.37	16.25	18.7	23.94	27.55	7.89	
027SE	2021-11-25T03:20:00Z	7:20 PM	55.84	14.38	12.89	14.83	24.96	28.72	7.82	
027SE	2021-11-25T03:30:00Z	7:30 PM	55.57	14.51	15.75	18.12	25.4	29.23	7.8	
027SE	2021-11-25T03:40:00Z	7:40 PM	55.98	14.32	13.63	15.69	26.54	30.54	7.84	
027SE	2021-11-25T03:50:00Z	7:50 PM	56.07	14.25	12.17	14	20.57	23.67	7.81	
027SE	2021-11-25T04:00:00Z	8:00 PM	55.79	14.48	12.64	14.55	23.81	27.4	7.93	
027SE	2021-11-25T04:10:00Z	8:10 PM	55.5	14.85	13.28	15.28	21.33	24.55	8.25	
027SE	2021-11-25T04:20:00Z	8:20 PM	55.3	15.03	10.96	12.61	17.34	19.95	8.36	
027SE	2021-11-25T04:30:00Z	8:30 PM	55.35	15.12	9.73	11.2	17.4	20.02	8.53	
027SE	2021-11-25T04:40:00Z	8:40 PM	55.2	15.21	9.35	10.76	16.82	19.36	8.54	
027SE	2021-11-25T04:50:00Z	8:50 PM	55.19	15.03	12.49	14.37	22.85	26.3	8.27	
027SE	2021-11-25T05:00:00Z	9:00 PM	55.18	14.95	12.61	14.51	20	23.02	8.14	
027SE	2021-11-25T05:10:00Z	9:10 PM	55.15	14.99	14.29	16.44	23.31	26.82	8.18	
027SE	2021-11-25T05:20:00Z	9:20 PM	55.27	14.84	14.91	17.16	22.41	25.79	8.05	
027SE	2021-11-25T05:30:00Z	9:30 PM	55.35	14.68	12.37	14.24	25.27	29.08	7.88	
027SE	2021-11-25T05:40:00Z	9:40 PM	55.27	14.6	12.63	14.53	22.85	26.3	7.69	
027SE	2021-11-25T05:50:00Z	9:50 PM	55.17	14.68	16.02	18.44	28.25	32.51	7.73	
027SE	2021-11-25T06:00:00Z	10:00 PM	54.95	14.71	13.94	16.04	22.98	26.44	7.6	
027SE	2021-11-25T06:10:00Z	10:10 PM	54.5	15.02	12.03	13.84	21.33	24.55	7.69	
027SE	2021-11-25T06:20:00Z	10:20 PM	54.29	15.18	11.55	13.29	17.53	20.17	7.75	
027SE	2021-11-25T06:30:00Z	10:30 PM	54.22	15.18	12.63	14.53	23.37	26.89	7.7	
027SE	2021-11-25T06:40:00Z	10:40 PM	54.53	14.9	14.21	16.35	29.65	34.12	7.54	
027SE	2021-11-25T06:50:00Z	10:50 PM	54.66	14.82	14.82	17.05	27.56	31.72	7.53	
027SE	2021-11-25T07:00:00Z	11:00 PM	54.41	15.07	16.6	19.1	25.71	29.01	7.60	

0275E	2021-11-25T06:50:00Z	10:50 PM	54.66	14.82	14.82	17.05	27.56	31.72	7.53
0275E	2021-11-25T07:00:00Z	11:00 PM	54.41	15.07	16.6	19.1	25.21	29.01	7.69
0275E	2021-11-25T07:10:00Z	11:10 PM	54.14	15.05	16.47	18.95	26.29	30.25	7.44
0275E	2021-11-25T07:20:00Z	11:20 PM	54.2	14.87	14.41	16.58	26.29	30.25	7.23
0275E	2021-11-25T07:30:00Z	11:30 PM	54.72	14.39	16.43	18.91	27.11	31.2	6.93
0275E	2021-11-25T07:40:00Z	11:40 PM	55.02	14.11	16.71	19.23	28.44	32.73	6.75
0275E	2021-11-25T07:50:00Z	11:50 PM	54.74	14.19	15.02	17.28	23.62	27.18	6.65
0275E	2021-11-25T08:00:00Z	12:00 AM	54.23	14.34	15.95	18.35	28.07	32.3	6.46
0275E	2021-11-25T08:10:00Z	12:10 AM	53.88	14.42	18.18	20.92	28.07	32.3	6.3
0275E	2021-11-25T08:20:00Z	12:20 AM	53.71	14.45	19.04	21.91	27.05	31.13	6.21
0275E	2021-11-25T08:30:00Z	12:30 AM	53.65	14.42	18.87	21.72	31.11	35.8	6.12
0275E	2021-11-25T08:40:00Z	12:40 AM	53.71	14.41	23.22	26.72	32.57	37.48	6.15
0275E	2021-11-25T08:50:00Z	12:50 AM	53.68	14.41	18.34	21.11	30.99	35.66	6.13
0275E	2021-11-25T09:00:00Z	1:00 AM	53.64	14.35	17.01	19.57	28.38	32.66	6
0275E	2021-11-25T09:10:00Z	1:10 AM	53.74	14.14	17.81	20.5	27.05	31.13	5.76
0275E	2021-11-25T09:20:00Z	1:20 AM	53.65	14.11	19	21.86	30.35	34.93	5.65
0275E	2021-11-25T09:30:00Z	1:30 AM	53.69	13.95	16.49	18.98	29.08	33.46	5.43
0275E	2021-11-25T09:40:00Z	1:40 AM	53.53	13.98	16.39	18.86	31.05	35.73	5.35
0275E	2021-11-25T09:50:00Z	1:50 AM	53.19	14.36	18.6	21.4	30.67	35.29	5.66
0275E	2021-11-25T10:00:00Z	2:00 AM	52.82	14.57	19.33	22.24	31.55	36.31	5.67
0275E	2021-11-25T10:10:00Z	2:10 AM	52.53	14.57	16.2	18.64	27.42	31.55	5.44
0275E	2021-11-25T10:20:00Z	2:20 AM	52.82	14.19	17.21	19.8	30.92	35.58	5.1
0275E	2021-11-25T10:30:00Z	2:30 AM	52.85	14.1	18.8	21.63	31.62	36.39	4.99
0275E	2021-11-25T10:40:00Z	2:40 AM	52.63	14.27	20.93	24.09	31.93	36.74	5.07
0275E	2021-11-25T10:50:00Z	2:50 AM	52.34	14.38	19.68	22.65	33.84	38.94	5
0275E	2021-11-25T11:00:00Z	3:00 AM	52.32	14.26	21.82	25.11	36.64	42.16	4.8
0275E	2021-11-25T11:10:00Z	3:10 AM	52.29	14.24	17.32	19.93	27.81	32	4.75
0275E	2021-11-25T11:20:00Z	3:20 AM	52.46	13.94	18.32	21.08	30.73	35.36	4.43
0275E	2021-11-25T11:30:00Z	3:30 AM	52.5	13.78	18.39	21.16	34.48	39.68	4.21
0275E	2021-11-25T11:40:00Z	3:40 AM	52.11	14.09	16.43	18.91	27.94	32.15	4.38
0275E	2021-11-25T11:50:00Z	3:50 AM	51.86	14.21	16.04	18.46	26.98	31.05	4.36
0275E	2021-11-25T12:00:00Z	4:00 AM	52.09	14.06	19.52	22.46	30.16	34.71	4.31
0275E	2021-11-25T12:10:00Z	4:10 AM	51.78	14.28	18.83	21.67	31.81	36.61	4.4
0275E	2021-11-25T12:20:00Z	4:20 AM	51.69	14.29	18.58	21.38	33.14	38.14	4.34
0275E	2021-11-25T12:30:00Z	4:30 AM	51.82	14.15	19.66	22.62	33.08	38.07	4.23
0275E	2021-11-25T12:40:00Z	4:40 AM	51.8	14.08	17.28	19.89	27.69	31.87	4.11
0275E	2021-11-25T12:50:00Z	4:50 AM	51.55	14.12	16.61	19.11	34.35	39.53	3.97
0275E	2021-11-25T13:00:00Z	5:00 AM	51.54	14.09	21.69	24.96	36.19	41.65	3.92
0275E	2021-11-25T13:10:00Z	5:10 AM	51.53	14.07	19.96	22.97	37.33	42.96	3.88
0275E	2021-11-25T13:20:00Z	5:20 AM	51.37	14.15	17.09	19.67	29.46	33.9	3.87
0275E	2021-11-25T13:30:00Z	5:30 AM	51.14	14.31	16.79	19.32	29.27	33.68	3.93
0275E	2021-11-25T13:40:00Z	5:40 AM	51.07	14.25	17.67	20.33	26.23	30.18	3.78
0275E	2021-11-25T13:50:00Z	5:50 AM	51.22	14.03	16.28	18.73	26.16	30.1	3.57
0275E	2021-11-25T14:00:00Z	6:00 AM	51.25	13.89	16.22	18.67	28.51	32.81	3.38
0275E	2021-11-25T14:10:00Z	6:10 AM	51.13	13.96	15.56	17.91	24.19	27.84	3.39
0275E	2021-11-25T14:20:00Z	6:20 AM	51.14	14.01	16.35	18.82	29.27	33.68	3.47
0275E	2021-11-25T14:30:00Z	6:30 AM	51.08	14	15.86	18.25	31.49	36.24	3.41
0275E	2021-11-25T14:40:00Z	6:40 AM	51.34	13.8	20.85	23.99	33.33	38.36	3.31
0275E	2021-11-25T14:50:00Z	6:50 AM	51.46	13.56	19.1	21.98	34.35	39.53	3.03
0275E	2021-11-25T15:00:00Z	7:00 AM	51.65	13.28	16.29	18.75	28.76	33.1	2.74
0275E	2021-11-25T15:10:00Z	7:10 AM	51.69	13.19	14.36	16.53	30.22	34.78	2.63
0275E	2021-11-25T15:20:00Z	7:20 AM	52.06	12.89	15.22	17.51	24.06	27.69	2.43
0275E	2021-11-25T15:30:00Z	7:30 AM	52.32	12.86	16.18	18.62	25.59	29.45	2.59
0275E	2021-11-25T15:40:00Z	7:40 AM	52.38	12.94	21.88	25.18	35.05	40.33	2.77
0275E	2021-11-25T15:50:00Z	7:50 AM	52.32	13.16	20.31	23.37	34.03	39.16	3.08
0275E	2021-11-25T16:00:00Z	8:00 AM	52.48	13.12	23.46	27	39.75	45.74	3.15
0275E	2021-11-25T16:10:00Z	8:10 AM	52.58	13.1	21.18	24.37	35.62	40.99	3.19
0275E	2021-11-25T16:20:00Z	8:20 AM	52.85	12.91	21.38	24.6	32.07	36.91	3.1
0275E	2021-11-25T16:30:00Z	8:30 AM	53.22	12.74	18.26	21.01	34.1	39.24	3.11
0275E	2021-11-25T16:40:00Z	8:40 AM	53.43	12.7	18.83	21.67	29.21	33.61	3.21
0275E	2021-11-25T16:50:00Z	8:50 AM	53.76	12.69	17.43	20.06	31.24	35.95	3.45
0275E	2021-11-25T17:00:00Z	9:00 AM	53.93	12.82	21.22	24.42	35.37	40.7	3.81
0275E	2021-11-25T17:10:00Z	9:10 AM	54.26	12.68	18.79	21.62	31.43	36.17	3.83
0275E	2021-11-25T17:20:00Z	9:20 AM	54.73	12.5	18.74	21.57	25.71	29.59	3.9
0275E	2021-11-25T17:30:00Z	9:30 AM	55.18	12.37	17.92	20.62	33.39	38.42	4.04
0275E	2021-11-25T17:40:00Z	9:40 AM	55.44	12.35	17.66	20.32	35.31	40.63	4.21
0275E	2021-11-25T17:50:00Z	9:50 AM	55.55	12.38	16.01	18.42	31.24	35.95	4.35
0275E	2021-11-25T18:00:00Z	10:00 AM	55.88	12.15	1.9	2.19	23.56	27.11	4.21
0275E	2021-11-25T18:10:00Z	10:10 AM	56.51	11.52	0	0	0	0	3.56
0275E	2021-11-25T18:20:00Z	10:20 AM	56.63	11.48	0	0	0	0	3.58
0275E	2021-11-25T18:30:00Z	10:30 AM	56.81	11.48	0	0	0	0	3.73
0275E	2021-11-25T18:40:00Z	10:40 AM	56.81	11.11	6.76	7.78	38.73	44.57	3.03
0275E	2021-11-25T18:50:00Z	10:50 AM	56.84	11.47	20.7	23.82	32.95	37.92	3.73
0275E	2021-11-25T19:00:00Z	11:00 AM	57.29	11.67	19.77	22.75	33.66	38.74	4.46
0275E	2021-11-25T19:10:00Z	11:10 AM	57.71	11.38	17.31	19.92	29.78	34.27	4.25
0275E	2021-11-25T19:20:00Z	11:20 AM	57.7	10.99	19.69	22.66	31.43	36.17	3.49
0275E	2021-11-25T19:30:00Z	11:30 AM	57.97	10.71	21.29	24.5	36.7	42.23	3.16
0275E	2021-11-25T19:40:00Z	11:40 AM	58.2	10.47	19.35	22.27	37.52	43.18	2.85
0275E	2021-11-25T19:50:00Z	11:50 AM	58.65	10.38	19.75	22.73	40.63	46.76	3.02
0275E	2021-11-25T20:00:00Z	12:00 PM	58.81	10.24	20.48	23.57	36.19	41.65	2.86
0275E	2021-11-25T20:10:00Z	12:10 PM	58.8	9.81	18.43	21.21	33.72	38.8	1.94
0275E	2021-11-25T20:20:00Z	12:20 PM	59.34	9.26	19.88	22.88	34.54	39.75	1.14
0275E	2021-11-25T20:30:00Z	12:30 PM	59.72	9.03	17.61	20.27	27.56	31.72	0.91
0275E	2021-11-25T20:40:00Z	12:40 PM	59.74	9.08	16.48	18.96	29.84	34.34	1.04

0275E	2021-11-25T20:40:00Z	12:40 PM	59.74	9.08	16.48	18.96	29.84	34.34	1.04
0275E	2021-11-25T20:50:00Z	12:50 PM	60.22	8.67	18.6	21.4	37.84	43.55	0.44
0275E	2021-11-25T21:00:00Z	1:00 PM	59.98	8.76	19.84	22.83	34.6	39.82	0.47
0275E	2021-11-25T21:10:00Z	1:10 PM	60.15	8.98	17.54	20.18	30.03	34.56	1.12
0275E	2021-11-25T21:20:00Z	1:20 PM	59.8	9.11	20.56	23.66	32.32	37.19	1.15
0275E	2021-11-25T21:30:00Z	1:30 PM	60.37	9.1	18.34	21.11	32.95	37.92	1.57
0275E	2021-11-25T21:40:00Z	1:40 PM	60.12	8.98	20.67	23.79	38.16	43.91	1.1
0275E	2021-11-25T21:50:00Z	1:50 PM	60.61	8.77	19.53	22.47	30.73	35.36	0.97
0275E	2021-11-25T22:00:00Z	2:00 PM	60.57	8.78	21.19	24.39	34.35	39.53	0.97
0275E	2021-11-25T22:10:00Z	2:10 PM	60.67	8.73	19.6	22.56	33.78	38.87	0.92
0275E	2021-11-25T22:20:00Z	2:20 PM	60.91	8.7	17.18	19.77	29.97	34.49	1.04
0275E	2021-11-25T22:30:00Z	2:30 PM	60.87	8.59	19.25	22.15	34.03	39.16	0.74
0275E	2021-11-25T22:40:00Z	2:40 PM	60.98	8.52	22.62	26.03	36.25	41.72	0.65
0275E	2021-11-25T22:50:00Z	2:50 PM	60.83	8.52	23.76	27.34	38.35	44.13	0.54
0275E	2021-11-25T23:00:00Z	3:00 PM	61.14	8.44	20.42	23.5	33.08	38.07	0.58
0275E	2021-11-25T23:10:00Z	3:10 PM	61.05	8.33	23.64	27.2	36.83	42.38	0.23
0275E	2021-11-25T23:20:00Z	3:20 PM	61.1	8.23	23.14	26.63	35.37	40.7	0.02
0275E	2021-11-25T23:30:00Z	3:30 PM	61.29	8.17	19.81	22.8	38.54	44.35	0.01
0275E	2021-11-25T23:40:00Z	3:40 PM	61.27	8.13	18.72	21.54	28.13	32.37	-0.11
0275E	2021-11-25T23:50:00Z	3:50 PM	61.22	8.05	19.12	22	35.75	41.14	-0.35
0275E	2021-11-26T00:00:00Z	4:00 PM	61.26	7.98	15.83	18.22	25.52	29.37	-0.5
0275E	2021-11-26T00:10:00Z	4:10 PM	61.27	7.83	18.18	20.92	28.82	33.17	-0.89
0275E	2021-11-26T00:20:00Z	4:20 PM	61.16	7.78	17.02	19.59	31.11	35.8	-1.1
0275E	2021-11-26T00:30:00Z	4:30 PM	60.9	7.89	16.92	19.47	24.89	28.64	-1.01
0275E	2021-11-26T00:40:00Z	4:40 PM	60.32	8.14	17.79	20.47	29.02	33.4	-0.8
0275E	2021-11-26T00:50:00Z	4:50 PM	59.89	8.32	15.79	18.17	23.31	26.82	-0.67
0275E	2021-11-26T01:00:00Z	5:00 PM	59.61	8.44	13.96	16.06	21.27	24.48	-0.59
0275E	2021-11-26T01:10:00Z	5:10 PM	59.43	8.51	13.94	16.04	26.35	30.32	-0.55
0275E	2021-11-26T01:20:00Z	5:20 PM	59.23	8.52	12.63	14.53	21.59	24.85	-0.68
0275E	2021-11-26T01:30:00Z	5:30 PM	59.29	8.45	13.88	15.97	20.89	24.04	-0.81
0275E	2021-11-26T01:40:00Z	5:40 PM	59.34	8.34	14.08	16.2	21.84	25.13	-1.04
0275E	2021-11-26T01:50:00Z	5:50 PM	59.41	8.24	13.62	15.67	22.41	25.79	-1.24
0275E	2021-11-26T02:00:00Z	6:00 PM	59.2	8.21	10.61	12.21	17.78	20.46	-1.47
0275E	2021-11-26T02:10:00Z	6:10 PM	59.28	8.14	11.23	12.92	19.49	22.43	-1.59
0275E	2021-11-26T02:20:00Z	6:20 PM	59.69	7.95	11.96	13.76	19.24	22.14	-1.77
0275E	2021-11-26T02:30:00Z	6:30 PM	59.77	7.88	12.59	14.49	26.1	30.04	-1.89
0275E	2021-11-26T02:40:00Z	6:40 PM	59.96	7.88	12.04	13.86	21.33	24.55	-1.74
0275E	2021-11-26T02:50:00Z	6:50 PM	59.93	7.93	12.67	14.58	20.76	23.89	-1.64
0275E	2021-11-26T03:00:00Z	7:00 PM	59.96	7.96	12.37	14.24	18.8	21.63	-1.54
0275E	2021-11-26T03:10:00Z	7:10 PM	59.79	8.05	12.79	14.72	21.65	24.91	-1.43
0275E	2021-11-26T03:20:00Z	7:20 PM	59.77	8.17	15.69	18.06	23.94	27.55	-1.14
0275E	2021-11-26T03:30:00Z	7:30 PM	59.92	8.34	18.53	21.32	30.61	35.23	-0.6
0275E	2021-11-26T03:40:00Z	7:40 PM	59.75	8.46	17.01	19.57	25.21	29.01	-0.43
0275E	2021-11-26T03:50:00Z	7:50 PM	59.59	8.5	15.2	17.49	26.03	29.95	-0.46
0275E	2021-11-26T04:00:00Z	8:00 PM	59.6	8.46	14.43	16.61	23.62	27.18	-0.55
0275E	2021-11-26T04:10:00Z	8:10 PM	59.71	8.57	13.1	15.08	21.27	24.48	-0.19
0275E	2021-11-26T04:20:00Z	8:20 PM	59.68	8.63	13.14	15.12	26.67	30.69	-0.07
0275E	2021-11-26T04:30:00Z	8:30 PM	60.06	8.64	15.99	18.4	29.46	33.9	0.24
0275E	2021-11-26T04:40:00Z	8:40 PM	59.91	8.81	15.84	18.23	23.75	27.33	0.53
0275E	2021-11-26T04:50:00Z	8:50 PM	59.77	8.9	16.14	18.57	27.94	32.15	0.64
0275E	2021-11-26T05:00:00Z	9:00 PM	59.7	8.85	13.22	15.21	20.83	23.97	0.47
0275E	2021-11-26T05:10:00Z	9:10 PM	59.68	8.83	13.55	15.59	21.33	24.55	0.41
0275E	2021-11-26T05:20:00Z	9:20 PM	59.49	8.93	11.51	13.25	19.87	22.87	0.5
0275E	2021-11-26T05:30:00Z	9:30 PM	59.86	8.8	11.16	12.84	19.87	22.87	0.47
0275E	2021-11-26T05:40:00Z	9:40 PM	59.59	8.93	9.76	11.23	17.97	20.68	0.57
0275E	2021-11-26T05:50:00Z	9:50 PM	59.33	8.92	10.52	12.11	16.19	18.63	0.35
0275E	2021-11-26T06:00:00Z	10:00 PM	59.52	8.8	11.09	12.76	16.82	19.36	0.21
0275E	2021-11-26T06:10:00Z	10:10 PM	59.66	8.72	12.85	14.79	19.3	22.21	0.13
0275E	2021-11-26T06:20:00Z	10:20 PM	59.79	8.73	12.9	14.85	21.08	24.26	0.25
0275E	2021-11-26T06:30:00Z	10:30 PM	59.71	8.87	13.92	16.02	23.62	27.18	0.52
0275E	2021-11-26T06:40:00Z	10:40 PM	58.95	9.2	12.07	13.89	19.05	21.92	0.71
0275E	2021-11-26T06:50:00Z	10:50 PM	58.47	9.44	13.82	15.9	29.08	33.46	0.88
0275E	2021-11-26T07:00:00Z	11:00 PM	57.79	9.71	14.36	16.53	25.27	29.08	0.94
0275E	2021-11-26T07:10:00Z	11:10 PM	57.27	9.85	13.45	15.48	22.03	25.35	0.84
0275E	2021-11-26T07:20:00Z	11:20 PM	56.58	10.08	13.67	15.73	23.94	27.55	0.79
0275E	2021-11-26T07:30:00Z	11:30 PM	55.81	10.37	13.65	15.71	19.87	22.87	0.79
0275E	2021-11-26T07:40:00Z	11:40 PM	55.85	10.39	14.03	16.15	23.68	27.25	0.86
0275E	2021-11-26T07:50:00Z	11:50 PM	55.92	10.39	13.67	15.73	21.59	24.85	0.92
0275E	2021-11-26T08:00:00Z	12:00 AM	55.55	10.54	13.47	15.5	22.66	26.08	0.93
0275E	2021-11-26T08:10:00Z	12:10 AM	55.26	10.67	13.1	15.08	21.27	24.48	0.96
0275E	2021-11-26T08:20:00Z	12:20 AM	55.45	10.64	11	12.66	20.32	23.38	1.05
0275E	2021-11-26T08:30:00Z	12:30 AM	54.52	10.93	12.5	14.38	19.81	22.8	0.89
0275E	2021-11-26T08:40:00Z	12:40 AM	54.15	11.03	12.92	14.87	18.92	21.77	0.79
0275E	2021-11-26T08:50:00Z	12:50 AM	54.67	10.87	13.76	15.83	24.13	27.77	0.89
0275E	2021-11-26T09:00:00Z	1:00 AM	54.7	10.84	14.32	16.48	20.76	23.89	0.86
0275E	2021-11-26T09:10:00Z	1:10 AM	53.54	11.21	12	13.81	18.8	21.63	0.65
0275E	2021-11-26T09:20:00Z	1:20 AM	52.38	11.62	11.5	13.23	20.57	23.67	0.5
0275E	2021-11-26T09:30:00Z	1:30 AM	52.82	11.48	11.23	12.92	20.13	23.17	0.59
0275E	2021-11-26T09:40:00Z	1:40 AM	52.53	11.6	8.83	10.16	13.84	15.93	0.58
0275E	2021-11-26T09:50:00Z	1:50 AM	52.32	11.7	8.3	9.55	12.83	14.76	0.59
0275E	2021-11-26T10:00:00Z	2:00 AM	52.89	11.45	11.44	13.16	15.11	17.39	0.59
0275E	2021-11-26T10:10:00Z	2:10 AM	53.03	11.44	12.56	14.45	17.4	20.02	0.68
0275E	2021-11-26T10:20:00Z	2:20 AM	53.11	11.35	15.86	18.25	21.2	24.4	0.58
0275E	2021-11-26T10:30:00Z	2:30 AM	53.52	11.27	15.88	18.27	22.66	26.08	0.75

027SE	2021-11-26T10:30:00Z	2:30 AM		53.52	11.27	15.88	18.27	22.66	26.08	0.75
027SE	2021-11-26T10:40:00Z	2:40 AM		53.77	11.24	14.78	17.01	21.27	24.48	0.89
027SE	2021-11-26T10:50:00Z	2:50 AM		52.45	11.83	11.26	12.96	15.24	17.54	0.93
027SE	2021-11-26T11:00:00Z	3:00 AM		52.33	11.93	13.56	15.6	18.99	21.85	1.01
027SE	2021-11-26T11:10:00Z	3:10 AM		53.45	11.62	14.1	16.23	21.46	24.7	1.34
027SE	2021-11-26T11:20:00Z	3:20 AM		55.71	10.9	18.27	21.02	28.76	33.1	1.76
027SE	2021-11-26T11:30:00Z	3:30 AM		55.91	10.82	19.68	22.65	29.59	34.05	1.76
027SE	2021-11-26T11:40:00Z	3:40 AM		55.35	11.04	19.55	22.5	25.59	29.45	1.75
027SE	2021-11-26T11:50:00Z	3:50 AM		55.06	11.19	18.82	21.66	26.67	30.69	1.81
027SE	2021-11-26T12:00:00Z	4:00 AM		55.1	11.26	18.31	21.07	26.67	30.69	1.97
027SE	2021-11-26T12:10:00Z	4:10 AM		55.29	11.26	18.28	21.04	25.27	29.08	2.12
027SE	2021-11-26T12:20:00Z	4:20 AM		54.68	11.53	12.41	14.28	17.78	20.46	2.14
027SE	2021-11-26T12:30:00Z	4:30 AM		54.69	11.61	11.92	13.72	18.22	20.97	2.3
027SE	2021-11-26T12:40:00Z	4:40 AM		55.24	11.49	14.5	16.69	22.1	25.43	2.51
027SE	2021-11-26T12:50:00Z	4:50 AM		55.43	11.51	14.57	16.77	21.02	24.19	2.7
027SE	2021-11-26T13:00:00Z	5:00 AM		55.31	11.49	16.01	18.42	22.16	25.5	2.56
027SE	2021-11-26T13:10:00Z	5:10 AM		55.15	11.43	15.06	17.33	19.74	22.72	2.33
027SE	2021-11-26T13:20:00Z	5:20 AM		55	11.4	11.55	13.29	16	18.41	2.15
027SE	2021-11-26T13:30:00Z	5:30 AM		55.76	10.99	12.11	13.94	17.84	20.53	1.98
027SE	2021-11-26T13:40:00Z	5:40 AM		55.63	10.99	12.31	14.17	17.14	19.72	1.87
027SE	2021-11-26T13:50:00Z	5:50 AM		55.63	10.89	15.69	18.06	20.2	23.25	1.68
027SE	2021-11-26T14:00:00Z	6:00 AM		55.47	10.83	14.25	16.4	19.05	21.92	1.44
027SE	2021-11-26T14:10:00Z	6:10 AM		55.43	10.58	15.01	17.27	18.8	21.63	0.92
027SE	2021-11-26T14:20:00Z	6:20 AM		55.54	10.19	19.01	21.88	25.52	29.37	0.21
027SE	2021-11-26T14:30:00Z	6:30 AM		55.76	9.99	20.93	24.09	28.07	32.3	-0.03
027SE	2021-11-26T14:40:00Z	6:40 AM		55.22	10.12	17.45	20.08	22.98	26.44	-0.18
027SE	2021-11-26T14:50:00Z	6:50 AM		54.7	10.23	16.03	18.45	18.92	21.77	-0.36
027SE	2021-11-26T15:00:00Z	7:00 AM		55.51	9.78	13.59	15.64	16.26	18.71	-0.67
027SE	2021-11-26T15:10:00Z	7:10 AM		55.83	9.6	12.94	14.89	16.38	18.85	-0.81
027SE	2021-11-26T15:20:00Z	7:20 AM		56.78	9.19	11.06	12.73	15.81	18.19	-0.98
027SE	2021-11-26T15:30:00Z	7:30 AM		57.69	8.91	7.72	8.88	14.42	16.59	-0.93
027SE	2021-11-26T15:40:00Z	7:40 AM		58.49	8.7	4.72	5.43	8.95	10.3	-0.81
027SE	2021-11-26T15:50:00Z	7:50 AM		59.69	8.36	7.96	9.16	15.17	17.46	-0.73
027SE	2021-11-26T16:00:00Z	8:00 AM		60.64	8.13	5.45	6.27	12.7	14.61	-0.58
027SE	2021-11-26T16:10:00Z	8:10 AM		60.99	8.13	3.94	4.53	10.1	11.62	-0.32
027SE	2021-11-26T16:20:00Z	8:20 AM		60.94	8.27	4.69	5.4	13.9	16	0
027SE	2021-11-26T16:30:00Z	8:30 AM		59.97	8.55	0	0	0	0	-0.04
027SE	2021-11-26T16:40:00Z	8:40 AM		59.4	8.77	0	0	0	0	0.05
027SE	2021-11-26T16:50:00Z	8:50 AM		58.81	9.08	0	0	0	0	0.32
027SE	2021-11-26T17:00:00Z	9:00 AM		58.09	9.42	0	0	0	0	0.54
027SE	2021-11-26T17:10:00Z	9:10 AM		58.01	9.6	0	0	0	0	0.88
027SE	2021-11-26T17:20:00Z	9:20 AM		57.41	9.96	0	0	0	0	1.18
027SE	2021-11-26T17:30:00Z	9:30 AM		57.55	10.09	0	0	0	0	1.57
027SE	2021-11-26T17:40:00Z	9:40 AM		57.85	10	0	0	0	0	1.61
027SE	2021-11-26T17:50:00Z	9:50 AM		57.53	10.23	0	0	0	0	1.84
027SE	2021-11-26T18:00:00Z	10:00 AM		57.61	10.25	0	0	0	0	1.94
027SE	2021-11-26T18:10:00Z	10:10 AM		58.51	9.95	0	0	0	0	2.02
027SE	2021-11-26T18:20:00Z	10:20 AM		59.88	9.41	0	0	0	0	1.9
027SE	2021-11-26T18:30:00Z	10:30 AM		61.7	8.59	0	0	0	0	1.37
027SE	2021-11-26T18:40:00Z	10:40 AM		62.07	8.56	8.85	10.18	23.43	26.96	1.58
027SE	2021-11-26T18:50:00Z	10:50 AM		61.82	8.62	17.63	20.29	23.24	26.74	1.54
027SE	2021-11-26T19:00:00Z	11:00 AM		62.01	8.61	14.21	16.35	21.2	24.4	1.66
027SE	2021-11-26T19:10:00Z	11:10 AM		62.35	8.64	15.09	17.37	24.83	28.57	1.99
027SE	2021-11-26T19:20:00Z	11:20 AM		62.27	8.69	15.63	17.99	24.64	28.36	2.05
027SE	2021-11-26T19:30:00Z	11:30 AM		62.97	8.55	13.36	15.37	20.06	23.08	2.24
027SE	2021-11-26T19:40:00Z	11:40 AM		63.52	8.48	13.29	15.29	20.32	23.38	2.49
027SE	2021-11-26T19:50:00Z	11:50 AM		63.33	8.55	15.52	17.86	25.27	29.08	2.51
027SE	2021-11-26T20:00:00Z	12:00 PM		63.54	8.52	16.88	19.43	23.81	27.4	2.6

Association of Rural Town Councils
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Lake Hughes, CA 93532
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1 February 2022

SENT VIA EMAIL

Los Angeles County Department of Regional Planning
Thuy Hua, Supervising Regional Planner
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
climate@planning.lacounty.gov

Dear Ms. Hua,

Subject: Notice of Preparation of a Program Environmental Impact Report and Public Scoping Meeting for the Los Angeles County 2045 Climate Action Plan

The Association of Rural Town Councils (ARTC) appreciates the opportunity to comment on the revised Climate Action Plan (CAP) component of the General Plan's Air Quality Element. The ARTC commented on the March 2020 CAP, and continues to experience concerns regarding the implementation of target reductions in greenhouse gases and the ultimate goal of carbon neutrality by 2045, and how implementation will affect rural communities of the Antelope Valley (AV).

Firstly, there are references to "Draft 2045 Climate Action Plan" which is nowhere to be found on any Regional Planning websites or pages. In fact, the Initial Study (IS) states, "The Draft 2045 CAP includes 11 overarching strategies and 26 measures, each of which has multiple implementing actions (GRAs)." This has caused confusion because there is no 2045 plan to reference, and alludes to the Draft 2045 CAP having been completed, with the Initial Study fashioned around the 2045 Draft Plan. If the NOP and IS include evaluation of the Draft 2020 CAP, then it must be indicated in this effort, and time extended for additional evaluation and opportunity for comment.

Page one of the IS states, "Implementation of the Draft 2045 CAP, once approved, would occur throughout unincorporated Los Angeles County in all zoning designations." This is particularly concerning when considering the statements provided by Ms. Kristin Pawling of the Chief Sustainability Office during the March 2020 CAP Webinar, which indicated the 2020 plan—because of jurisdictional issues could only be imposed upon unincorporated areas of the County, but the office would like all 88 cities outside county jurisdiction to participate voluntarily in order to reach the OurCounty Sustainability Plan goals, and the County would exhibit "climate leadership." Ms. Pawling described the Plan as "aspirational, but informs "direct action at the county level," and "many targets in the CAP are directly informed by the Sustainability Plan." Furthermore, she stated the Green House Gas (GHG) Emissions Inventory that evaluated current levels of GHG were "largely countywide" (Webinar 15:36-25:20). This means a large contingent of the County's population, producing GHG, will not be legally bound by the CAP or the Sustainability Plan goals. This also means the 2045 CAP GHG reduction goals' impacts will disproportionately affect many unincorporated and rural communities. The 500,000 Antelope Valley residents will bear the largest burden of proposed GHG measures, informed by an inflated Emissions Inventory that will most benefit the south county, and jurisdictions that do not partake in the CAP efforts.

AESTHETICS

The ARTC and other town councils have submitted many letters and participated in public hearings regarding the placement of utility-scale renewable energy projects that cover thousands of acres of rural lands surrounding our communities. It is clear from our experience that the drive to “net-zero” carbon emissions has come at the expense of rural communities and other populations at large in the AV. The IS discusses ordinances already in place that would address any visual impacts created by implementation of the Draft 2045 CAP, i.e., the Hillside management Ordinance, which states, “[C]omponents of the County Code that relate to the protection of Hillside Management Areas would ensure that the scenic character of ridgelines and hillsides would be preserved. As most of the scenic vistas in LA County are available from hillsides and ridgelines, compliance with the Hillside Management Areas Ordinance would ensure that visual impacts from scenic vistas would be reduced” (11). However, *all* of the solar projects in the AV have been built on the valley floor. Moreover, if one believes that the General Plan Policies cited in this section on aesthetics has actually preserved and enforced GP/Antelope Valley Area Plan goals and policies driving (AVAP) CUP actions related to visual impacts mitigation agreed to by solar projects, then you are misled. Supplied below are photographs that are representative of what happens to our scenic vistas when utility-scale renewable energy and transmission towers are built to transport renewable energy to the LA basin. Hillside management will not reduce view impacts from hillsides and ridgelines.



View looking north from Land Veritas Mitigation Bank (2016) CA Aqueduct at 110th St. West

Environmental Impact Reviews often state similarly, that there are no significant impacts to scenic areas, as thousands of acres of chain link and barbed wire fencing intrude on the open spaces of recovering agricultural lands, as industrial commercial projects are incongruously thrust into rural areas and communities. The road transecting the two solar projects on the left has been identified for years as a Scenic Highway in the General Plan’s Scenic Highway Element 1974, and most recently in the Antelope Valley Area Plan’s Scenic Drives Map 4.2.

Below are three additional photographs showing an instance of detrimental, and likely permanent visual impacts from construction of AV Solar Ranch 1.



Before AV Solar Ranch 1, Fairmont



After the construction of AVSR 1, note the chainlink and barbed wire fencing, impermeable to ground dwelling wildlife.



The Silverado Project area, pre-construction, 110th St. West, Avenue K, TRTP and Barren Ridge Transmission lines in background. (2014)

During the construction of the Silverado Projects, as mitigation, a portion of the county-designated “Poppy Trail” was created, with fabulous views of the finished solar project, also visible from the State of California Poppy Reserve. Mitigation which certainly does not include preservation of the wildflower fields destroyed to construct the project.

Many of the RE projects currently built are along scenic routes identified in the AVAP, with inadequate mitigation for impacts created by these projects. Also, explain how the REO has protected viewshed piecemealed, project by project. Drive across the Antelope Valley for a first person look. There is very real potential for implementation of the CAP Plan to open the floodgates for thousands more acres of utility-scale solar projects. For the IS to claim less than significant impacts from the implementation of the CAP Plan is disingenuous, especially with incentives offered by the county and the federal governments, and especially by the hundreds of thousands of acres of solar necessary for current and future “fossil fuel free” LA County. The ARTC requests this be reconsidered and impacts identified as significant and explored in the Environmental Review. The mandate to bring the county into a carbon neutral state with 100 percent renewable energy will, as mentioned, be perpetrated at the expense of rural communities, residents, and natural environments across the AV, which often provide great economic benefits to local businesses.

Several times in the NOP, under various headings, the statement is made: “The Draft 2045 CAP does not include specific proposed development, and it would be speculative to guess where any specific future development might be proposed in furtherance of Draft 2045 CAP goals. For the reasons discussed . . . this criterion will not be evaluated further as part of the CEQA process for the Draft 2045 CAP.” The ARTC disagrees, and posits that the policies for the decarbonization, including streamlined review under the PEIR as stated under the “Background” heading, describes a “new development review consistency checklist to allow projects to streamline CEQA compliance for their projects by using the CAP, per CEQA Guidelines § 15183.5”(3). Furthermore, “The Draft 2045 CAP could also indirectly incentivize

the development of solar facilities in rural areas (such as the Antelope Valley), where they could be more visible from roads, trails and other at-grade elevations” (15). There is nothing indirect about this 2045 CAP. It is forthright in discussing policy efforts, strategies and measures, and eliminating GHG. The AV has already, and continues to be targeted for renewable energy with federal incentives; Bureau of Land Management and public lands policies; California’s Renewable Energy Portfolio and executive orders; California’s Desert Renewable Energy Conservation Plan; the county’s REO; SCE and LA Water & Power transmission and renewable energy projects; Joint Powers Authority Clean Power Alliance; City of Lancaster’s Net Zero Program; 2045 CAP’s Measure E1: Procure Zero-Carbon Electricity and Measure E5: Increase Renewable Energy Production; and the streamlining and incentives directed to projects through this ordinance via the CAP PEIR are the only proof needed to determine the designation of the AV as the place to build utility-scale renewable energy. How many utility-scale projects have been built in the south county?

AGRICULTURE AND FOREST

For several years, the ARTC has promoted the preservation of agriculture, as food source, as a way to improve air quality, and preserve important habitat. The water adjudication finalized in 2016 spelled a notable decline in agricultural development, and essentially took water from farmers to guarantee water for residential and commercial development, and seems to have provided a set-up for the proliferation of utility-scale solar projects.

As noted in the IS, there is little specially designated farmland. However, farm fields of the AV have provided not only food for people and livestock, but a haven for migratory birds traveling the Pacific Flyway which feed and nest in open fields, cultivated or not. The Audubon Society has designated the AV as an Important Bird Area, part of its list of places of worldwide importance. Worldwide, a coalition of organizations including the America Audubon Society has identified over 8,000 IBAs or Important Bird Areas.

The purpose of the IBA Program is to set “science-based” priorities for habitat conservation to “promote positive action to safeguard vital bird habitats.” According to the Audubon’s IBA website, “IBA inventories provide a scientifically defensible method for prioritizing conservation activities and allocating limited conservation dollars to ensure the maximum benefit to birds.” A subset of these 8,000 sites has been given the higher status of “Globally Important Bird Areas.” These 424 worldwide sites have special status due to “global conservation concern” (<http://web4.audubon.org/bird/iba/>). One of these 424 areas is in Los Angeles County, in the Western Antelope Valley. This site, the Antelope Valley Important Bird Area provides breeding, foraging and nesting habitat for Swainson’s Hawk, Golden and Bald Eagles, Northern Harriers, Burrowing Owls, Le Conte’s Thrasher, Tricolored Blackbirds and other sensitive species, including the California Condor. Describing this IBA, the Audubon Society states that, "The grassland bird community is most impressive in winter, when large numbers of raptors concentrate in the area. Large flocks of Vesper Sparrows, Horned Lark and Mountain Bluebirds also occur here, widely extirpated elsewhere in the Los Angeles area. The agricultural fields, especially alfalfa, are productive year round. Winter brings Mountain Plover, whose flocks are among the last in southern California. After wet winters, nesting grassland species like Northern Harrier linger well into spring, and occasionally even breed. Swainson's Hawk maintains its southernmost breeding outpost in the state here. As this IBA lies in the path of a major spring migrant route for songbirds, these windbreaks can host hundreds of vireos, thrushes and warblers during April and May."

Furthermore, IBAs are indicators of wide biological value for many species of flora and fauna. Again quoting the Audubon society, "Our data demonstrates that IBAs are also excellent indicators of biodiversity richness and are therefore also important for a wide range of species." This globally

important IBA is now threatened by what has been called an "alternative energy gold rush." The Antelope Valley IBA, rimmed by the Angeles Forest, the Tehachapi Mountains and year-round wetlands along the San Andreas Fault, is already home to AV Solar Ranch I, one of the largest solar plants in the world. Without a comprehensive plan in place to provide adequate mitigation for the foraging areas, i.e., loss of open, formerly agricultural lands, that will be lost due to alternative energy development, this biologically important area will be obliterated piece by piece until a tipping point is reached and threatened species like Tricolored Blackbirds, Burrowing Owls and Swainson's Hawk disappear from this area forever. The IS states:

Implementation of Draft 2045 CAP GHG reduction measures that involve ground disturbance could, depending on the location, result in the conversion of farmland to non-agricultural use. *For most types of development projects that may be proposed in furtherance of Draft 2045 CAP goals, construction is anticipated to occur primarily within developed areas such as parking lots, improvements to existing structures, and urban areas near public transportation.* However, other types of new projects encouraged by Draft 2045 CAP measures could occur in previously undeveloped areas such as facilities to increase waste diversion or renewable energy. *Measure E1: Procure Zero-Carbon Electricity and Measure E5: Increase Renewable Energy Production could result in the development of photovoltaic solar or other renewable energy generation facilities in undeveloped areas, which development could result in the conversion of farmland to a non-agricultural use.*

The ARTC argues that "most *types* of development" will occur in developed areas might be true, but particular large-scale projects allowed on A-2 zoned lands will likely occur in the AV, such as waste facilities, or open areas for waste diversion, or renewable energy. The AV already receives millions of tons of trash-filled green waste in the form of mulch, spread across fields that previously provided habitat for birds and other species reliant on our open fields for forage and nesting. For some reason, the decomposition of such waste is not considered a pollutant or a cause of significant impact and is promoted by our state and county. In addition, large mulch berms are used as a visual shield to obscure views of illegal marijuana growing operations. They are also a fire hazard, and are quite difficult to extinguish once ignited—ironically, no impact option is chosen in the IS.

It is also interesting that the IS states, "as a general matter, forest land would not be suitable for the implementation of actions in furtherance of the Draft 2045 CAP. For example, solar energy generation requires access to sun; forested areas do not provide that resource and would not be deforested to serve a solar energy generation use." While forested areas would not be deforested, and environmental impact study in the IS is not warranted, the anticipated influx of solar energy projects would, in fact, destroy tens of thousands of acres in the quest to achieve net-zero energy; it is repeatedly stated that this will not be addressed by the PEIR, whose subject is promotion of renewable energy. There will be significant impacts to "agriculturally zoned" lands.

Preservation of rural character is important to many rural town council areas, since many arose out of agricultural activity during the nineteenth and twentieth centuries. The 2045 CAP might not propose land use designations that would require zone changes. Unfortunately, zone change and a nearly blanket conversion of A-1 to A-2 during the development of the Antelope Valley Area Plan opened the door for ease in imposing utility-scale renewable energy upon rural residents, and all the destruction—including visual and scenic impacts, air quality issues, and lost biological value.

AIR QUALITY

The ARTC has had continuing concerns regarding air quality in the AV. It has been such a concern that the ARTC collaborated with the AVAQMD to submit a State of California Community Air Protection Program grant request in 2018 (enclosed). While there are many sources of particulate pollution in the AV, the introduction of utility-scale renewable energy has contributed mightily to an ongoing dust particulate problem; along with sand, rock and gravel production; fallow agricultural fields (lack of water); further sources of particulate pollution include two major highways, freight and passenger rail lines, and commercial/industrial activities.

The AV is an air quality nonattainment area for PM₁₀. Over the past ten years, residents in communities of the AV have experienced increasingly unhealthful air and property destruction akin to the Dust Bowl era of the 1930s and resulting threat of pulmonary illness. Predictable drought, water adjudication, diminishing agricultural activity, and renewable energy development have proven dust control measures and “Best Management Practices”(BMPs) like Antelope Valley Air Quality Management District's (AVAQMD) Rule 403, unsuccessful in preventing fugitive dust.

Fugitive dust can affect “sensitive receptors”—children, asthmatics, the elderly, those with pulmonary disease, cardiovascular disease, as well as the general public at large, because it can carry the spores of *Coccidioides immitus*—better known as Valley Fever. Failure of dust control plans puts residents all over the Antelope Valley at risk for this fungal infection, which can impose large public costs in lost productivity, disability, and healthcare. This concerns residents every time a utility-scale solar project is proposed. Since the AV is an air quality non-attainment area for PM₁₀, this leaves the question of whether current non-attainment of air quality levels of particulates combined with projects previously mentioned, plus Centennial, the National Cement Plant, and reasonably foreseeable massive solar and wind development will bring attention from the United States Environmental Protection Agency.

Because of cumulative effects of other utility-scale solar construction and operations, we see the need for expanded monitoring across the AV, through additional monitoring stations nearer to sources of pollution, with more encompassing, accurate quantification and analysis of Antelope Valley air quality to determine levels of PM₁₀ and PM_{2.5}. These actions are necessary to protect the health and well being of not only rural residents, but all residents of the AV.

The ARTC and other entities have repeatedly commented on air quality issues and the public health implications that are detailed in LA County Public Health Indicators 2018. The AV has the highest childhood asthma rate in the county, along with cardiovascular death rates, and low birth weight. This is a serious public health issue that must be evaluated in environmental impact review.

BIOLOGICAL RESOURCES

Many letters have been submitted on a variety of renewable energy projects that have impacted the natural environment, for which mitigation has proved insufficient. There are also many other impacts associated with biological resources related to renewable energy and various other development activities. The IS states, “There are currently no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved state, regional, or local habitat conservation plans in effect in unincorporated Los Angeles County. Therefore, no impact would occur.”

Conveniently, there are no *adopted* conservation plans in LA County. However, the County declined to support the State of California Fish and Wildlife's Antelope Valley Regional Conservation Investment Strategy, even though it is non-regulatory. There are issues with wildlife movement, and fragmentation of conservation land, which individual EIRs for projects are allowed to perpetrate. Regional Planning allows projects to set aside part of their development sites for conservation purposes, which are not connected to any other conservation lands, corridors, etc., Lacking are documented monitoring and evaluation of the success or failure of mitigation efforts for not only "Biology" concerns, but all of the issues discussed throughout this letter and listed in the IS. Biologist and raptor expert, K. Shawn Smallwood, of U. C. Davis, has also commented on the lack of monitoring and enforcement for conditions of approval for renewable energy projects, including the West Antelope Solar Project:

It has long been known that mitigation pursuant to CEQA has often either failed or has not been implemented, but with no consequences to the take-permit holder (Silva 1990). There should be consequences for not achieving mitigation objectives or performance standards. The project proponents should be required to provide a performance bond in an amount that is sufficient for an **independent party** to achieve the mitigation objectives originally promised, and in this case, the promises should be much more substantial. A fund is needed to support named individuals or an organization to track the implementation of mitigation measures. Report deadlines should be listed, and who will be the recipients of the reports. In my professional opinion . . . lack of specific monitoring details renders [environmental review] inadequate and uncertain and makes it impossible to gauge whether to what extent any mitigation measures will lessen potentially significant impacts on species. If these measures are not clearly laid out . . . then there will be no basis to determine that impacts will be less than significant once implemented. Furthermore, without adequate funding allocated in advance, there is no certainty that any proposed mitigation will actually take place.

Unfortunately, solar fields in the Antelope Valley destroy foraging areas and habitat for what Audubon has identified as a "Globally Important Bird Area." Non-native grassland and recovering vegetation provide cover, nesting, and foraging for indigenous and migratory waterfowl, song birds, and raptors alike, some of which are special status species. Air quality in the Antelope Valley has caused the highest incidence of respiratory disease in Los Angeles County according to their Health Department publication "Key Indicators of Health 2017." Many residents have stated their opposition to solar development, fearing respiratory disease and valley fever, which is ignored. It is more important to become net-zero and provide popularized feel-good "green energy" than be concerned about residents' health. This green energy touted by the State of California, Los Angeles County, and the City of Lancaster, to reduce electrical generation carbon emissions, is misleading. The costs include not only public health issues, but also real estate--desert environments that the Bureau of Land Management says could take 3,000 years to recover; the carbon exchanging qualities of undisturbed desert soils; the industrial pollution and carbon created by mining, processing, and manufacture of solar panels (in China, not in our backyard)--all produced with fossil fuels; difficulty recycling panels and its energy costs; inefficiency of solar electricity production; and industrializing our rural desert communities.

There are documented instances of destruction by sPower of an occupied Red Tailed Hawk nest, and Red Dawn Sunpower, LLC's wholesale removal of 95.44 acres of Joshua Trees of which 63.86 acres were within the Joshua Tree SEA #60 (unfortunately before their protected listing by CDFW).

HAZARDOUS MATERIALS

The ARTC requests that the PEIR evaluate the release of hazardous materials related to solid waste disposal, renewable energy projects—including battery storage facilities, organic waste processing facilities, sewage and/or mulch spreading operations, etc. The North County possesses large areas considered for Areas Potentially Suitable for Siting Alternative Technology Facilities in Los Angeles County (<https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4#>).

UTILITIES AND SERVICE SYSTEMS, ENERGY

Implementation of the 2045 CAP would promote the construction of energy transmission, which has been instrumental in the ignition of fires during high wind events and have caused the most destructive fires in California history. Areas that are targeted for transmission rights-of-way are stretched across miles from the source of energy production; fine examples exist from the AV to the South County—Barren Ridge Transmission Project, and the TRTP. The areas traversed are put at great risk of fire, and include our rural communities, many of which are in Very High Fire Hazard Zones. PSPS reduces our communities' ability to remain resilient in the face of fire danger through loss of ability to pump water for personal use, for fire suppression, and to communicate during these outages. Please evaluate significant impacts to our communities from related risk of additional transmission that will be required for the achievement of net zero emissions mandated by the 2045 CAP.

Perhaps foremost among concerns is the “Fossil Fuel Free LA County.” Retrofitting buildings—our homes with all electric appliances would also reduce rural residents' ability to maintain and protect our lives and property in the event of power failure. We are often last to receive repairs to services, and we know we must remain independent, and really, present prime examples of resilience touted by the OurCounty Sustainability Plan. Taking away fuel sources for pumping water, for warmth and cooking in the extreme weather conditions predominant in the AV is a very, very significant impact, and must be evaluated in the PEIR.

Respectfully,



Susan Zahnter
Director

CC: Supervisor Kathryn Barger, Planning Deputy Anish Saraiya, Senior Field Deputy Donna Termeer, Assistant Field Deputy Charles Bostwick

From: [Kathy Knight](#)
To: [DRP EPS Climate](#)
Subject: NOP Comments - Climate Action Plan Update
Date: Tuesday, February 1, 2022 4:25:02 PM

CAUTION: External Email. Proceed Responsibly.

February 1, 2022

Thuy Hua, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

Sent via email to: climate@planning.lacounty.gov

RE: NOP COMMENTS - CLIMATE ACTION PLAN UPDATE

From: Kathy Knight, Board Member
Ballona Ecosystem Education Project
1122 Oak St., Santa Monica, CA 90405
(310) 450-5961
kathyknight66@gmail.com

Ballona Ecosystem Education Project has the following comments on the Climate Action Plan Update:

1. This proposed plan includes the area of unincorporated Marina del Rey (pg. 5). Marina del Rey
Is directly adjacent to the north side of the Ballona Wetlands Ecological Reserve (BWER).
This wetland
Is a very important reserve for many reasons including:
 - a. It is a rare mostly freshwater wetland on the California coast that was saved years ago by local citizens
and purchased in 2003 by the State of California. It is currently under the supervision of the California
Dept. of Fish & Wildlife.
 - b. There are endangered species that live at the BWER, including the California Least Tern, Belding's Savannah Sparrow, and El Segundo Blue Butterfly.
 - c. It is the opportunity to do a slow careful restoration of this wetland to preserve its original ecology.
 - d. There are 3 drinking water quality aquifers below the surface at Ballona that are critical to future sources of water for humans, and for the wildlife at Ballona. They need to be strongly protected.
 - e. There needs to be a Groundwater Sustainability Plan for the aquifers and other ground water of the BWER, so there is a plan on how to protect the underground water there. There

also needs to be a hydrology study of the Ballona Wetlands Ecological Reserve done before any other action is taken. There has never been one done, so we do not know the ramifications of work in the area.

For these reasons and many more that we do not have time to write in since we just found out about this Climate Action

Plan Update yesterday evening, please do not plan any actions that would negatively impact the Ballona Wetlands Ecological Reserve.

And finally, please send us any information, updates, hearings on your notification list, to our email or address as posted above.

Thank you.

2/1/2022

Thuy Hua, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012

Re: Comments on the Notice of Preparation of a Draft Program Environmental Impact Report and Initial Study for the Los Angeles County 2045 Climate Action Plan

Dear Ms. Hua:

We are contacting you on behalf of BizFed, the Los Angeles County Business Federation. An alliance of over 200 business organizations who represent over 400,000 employers in Los Angeles County. We are writing to provide brief comments on the Notice of Preparation ("NOP") of a Draft Program Environmental Impact Report ("PEIR") and Initial Study ("IS") for the Los Angeles County 2045 Climate Action Plan ("2045 CAP" or "CAP").

We appreciate the county giving the community an opportunity to provide comments. However, we would like to respectfully note that the NOP and IS do not contain enough information to respond adequately to the County's request. The only draft of the 2045 CAP available to review is from two years ago and the County recognizes that the new, unreleased draft will be "substantially" revised. Without an updated CAP to review, it is impossible for the public to fully consider and comment on the CAP's potential environmental impacts.

We look forward to working with the county in developing a revised CAP that meets the state and county's clean air goals while balancing economic stability, job growth, population growth, housing, homelessness, and other pressing issues. As such, we believe the revised 2045 CAP must include a detailed economic impact analysis and cost analysis that can give regulators, residents, businesses, developers, and others a realistic scope as to how the plan will impact them.

As the County notes, since the release of the 2045 CAP in March of 2020, our region has changed considerably. We have learned just how fragile our supply chain is and believe it is necessary for the county to also consider a resiliency study that shows our dependency on the goods movement and how much the CAP can increase or decrease that dependency.

Further, recent new housing developments in the County have been at the forefront of climate resiliency. The LA Times reported that the County has "the most environmentally friendly suburban developments ever planned in California."¹ Tejon Ranch recently entered into a settlement agreement that included a commitment to reduce its GHG emissions to zero. Newhall Ranch was the first housing development of its size to commit to net-zero GHGs and was recognized in the California Air Resources Board's Scoping Plan as a model of sustainability. The 2045 CAP should recognize that projects may reduce GHG emissions through means other than those included in the CAP. For example, projects that commit to a net-zero GHG strategy should not have new GHG mitigation requirements imposed on them.

¹ Louis Sahagún, Environmental group and Tejon Ranch agree on plan to build 19,300 zero-emission homes, Los Angeles Times (Dec. 1, 2021), available at: <https://www.latimes.com/california/story/2021-12-01/tejon-ranch-will-build-19-300-zero-emission-homes>.

We appreciate your attention to these matters and look forward to reviewing a new draft 2045 CAP when available. We respectfully request that the County recirculate the NOP and IS for another round of public comment when the draft CAP is made available, which is necessary for the public to provide meaningful input on the PEIR.

If you have any questions regarding this letter, please contact sarah.wiltfong@bizfed.org.

Sincerely,



Brissa Sotelo-Vargas
BizFed Chair
Valero



David Fleming
BizFed Founding Chair



Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.

BizFed Association Members

7-Eleven Franchise Owners Association of Southern California
Action Apartment Association
Alhambra Chamber of Commerce
American Beverage Association
Apartment Association of Greater Los Angeles
Apartment Association, CA Southern Cities, Inc.
Arcadia Association of Realtors
AREAA North Los Angeles SFV SCV
Armenian Trade and Labor Association
Associated Builders & Contractors, Inc. Southern California Chapter
Association of Club Executives
Association of Independent Commercial Producers
Azusa Chamber of Commerce
Bell Gardens Chamber of Commerce
Beverly Hills Bar Association
Beverly Hills Chamber of Commerce
Biocom California - Los Angeles
BICEPP
Black Business Association
BNI 4SUCCESS
Bowling Centers of Southern California
Boyle Heights Chamber of Commerce
Building Industry Association - Baldyview
Building Industry Association - LA/Ventura Counties
Building Industry Association - Southern California
Building Owners & Managers Association of Greater Los Angeles
Burbank Association of REALTORS
Burbank Chamber of Commerce
Business and Industry Council for Emergency Planning and Preparedness
Business Resource Group
CA Natural Resources Producers Assoc
CalAsian Chamber
Calabasas Chamber of Commerce
California Apartment Association- Los Angeles
California Asphalt Pavement Association
California Bankers Association
California Business Properties Association
California Business Roundtable
California Cannabis Industry Association
California Cleaners Association
California Construction Industry and Materials Association
California Contract Cities Association
California Fashion Association
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Oil Marketers Association (CIOMA)
California Independent Petroleum Association
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Restaurant Association
California Retailers Association
California Small Business Alliance
California Self Storage Association
California Society of CPAs - Los Angeles Chapter
California Trucking Association
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
Central City Association
Century City Chamber of Commerce
Chatsworth/Porter Ranch Chamber of Commerce
Citrus Valley Association of Realtors
Claremont Chamber of Commerce
Coalition for Renewable Natural Gas
Coalition for Small Rental Property Owners
Commercial Industrial Council/Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water Quality
Council on Trade and Investment for Filipino Americans
Covina Chamber
Crenshaw Chamber Of Commerce
Crescenta Valley Chamber of Commerce
Culver City Chamber of Commerce
Downey Association of REALTORS
Downey Chamber of Commerce
Downtown Center Business Improvement District
Downtown Long Beach Alliance
El Monte/South El Monte Chamber
El Segundo Chamber of Commerce
Employers Group
Encino Chamber of Commerce
Energy Independence Now
Engineering Contractor's Association
EXP
F. A. S.T. - Fixing Angelenos Stuck in Traffic
Friends of Hollywood Central Park
FuturePorts
Gardena Valley Chamber
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Google Client Services, LLC
Greater Antelope Valley AOR
Greater Bakersfield Chamber of Commerce
Greater Lakewood Chamber of Commerce
Greater Leimert Park Village Crenshaw Corridor Business Improvement District
Greater Los Angeles African American Chamber
Greater Los Angeles Association of REALTORS
Greater Los Angeles New Car Dealers Association
Greater San Fernando Valley Regional Chamber
Harbor Association of Industry and Commerce
Harbor Trucking Association
Historic Core BID of Downtown Los Angeles
Hollywood Chamber
Hong Kong Trade Development Council
Hospital Association of Southern California
Hotel Association of Los Angeles
Huntington Park Area Chamber of Commerce
ICWA
Independent Cities Association
Industrial Environmental Association
Industry Business Council
Inland Empire Economic Partnership
International Cannabis Business Women Association
International Franchise Association
Irwindale Chamber of Commerce
La Cañada Flintridge Chamber
LA Fashion District BID
LA South Chamber of Commerce
Lancaster Chamber of Commerce
Larchmont Boulevard Association
Latin Business Association
Latino Food Industry Association
Latino Restaurant Association
LAX Coastal Area Chamber
League of California Cities
Long Beach Area Chamber
Long Beach Economic Partnership
Los Angeles Area Chamber
Los Angeles County Board of Real Estate
Los Angeles County Waste Management Association
Los Angeles Economic Development Corporation
Los Angeles Gateway Chamber of Commerce
Los Angeles Gay & Lesbian Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles Parking Association
MADIA Tech Launch
Malibu Chamber of Commerce
Marketplace Industry Association
Motion Picture Association of America, Inc.
MoveLA
Multicultural Business Alliance
NAIOP Southern California Chapter
Nareit
National Association of Tobacco Outlets
National Association of Waterfront Employers
National Association of Women Business Owners - CA
National Association of Women Business Owners - LA
National Federation of Independent Business
National Hookah Community Association
National Latina Business Women's Association
Orange County Business Council
Pacific Merchant Shipping Association
Pacific Palisades Chamber
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber
Pasadena Foothills Association of Realtors
PhRMA
Planned Parenthood Affiliates of California
Pomona Chamber
Rancho Southeast Association of Realtors
ReadyNation California
Recording Industry Association of America
Regional Black Chamber-San Fernando Valley
Regional Hispanic Chamber of Commerce
Regional San Gabriel Valley Chamber
Rosemead Chamber
San Dimas Chamber of Commerce
San Gabriel Chamber of Commerce
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Sherman Oaks Chamber
South Bay Association of Chambers
South Bay Association of Realtors
South Gate Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Sunland/Tujunga Chamber
Sunset Strip Business Improvement District
The California Business & Industrial Alliance (CABIA)
Torrance Area Chamber
Tri-Counties Association of Realtors
United Cannabis Business Association
United Chambers – San Fernando Valley & Region
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
US Green Building Council
US Resiliency Council
Valley Economic Alliance, The
Valley Industry & Commerce Association
Vermont Slauson Economic Development Corporation
Vernon Chamber
Veterans in Business Network
Vietnamese American Chamber
Warner Center Association
West Hollywood Chamber
West Hollywood Design District
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Western Electrical Contractors Association
Western Manufactured Housing Association
Western States Petroleum Association
Westside Council of Chambers
Whittier Chamber of Commerce
Wilmington Chamber
World Affairs/Town Hall Los Angeles
World Trade Center

From: [Sofia Quinones](#)
To: [DRP EPS Climate](#); firstdistrct@bos.lacounty.gov
Cc: [Dr. Nadine Diaz](#); [Jimenez Martha](#)
Subject: Unincorporated East os Angeles County Climate Action Plan
Date: Tuesday, February 1, 2022 4:56:39 PM

CAUTION: External Email. Proceed Responsibly.

Supervisor, Hilda Solis,

We are requesting that you extend the deadline for the LA County Climate Action Plan until our county is back to normal.

The plan itself violates the California Environmental Quality Act. Los Angeles County bears responsibility for sanctioning the proceeding of this current County Climate Action Plan. The pandemic has severely impacted disenfranchised communities. The meetings that took place excluded these very communities by denying us the ability to participate in this process. Furthermore, when we expressed our objections to these proceedings do to the lack of outreach in our communities and based on the digital divide and language barriers the response was to proceed. The response to our concerns was to email people and to have volunteers do the outreach work with no plan, materials or resources to do so. We requested that we be contacted and that did not happen. Failing to conduct a proper scoping process is a violation of CEQA. To proceed with this Climate Action Plan you are enabling the environmental justice issues that are killing us and it enables the segregation and continued racial inequality of our disenfranchised communities.

That data of the meeting participants proves our point. Furthermore, people outside of Unincorporated East LA attended the meetings. In these online meetings there is no way to distinguish who is from the community. According to a moderator there were participants from other areas of the state and outside of the state participating. We are requesting that your staff meet with the Boyle Heights East Los Angeles Coalition before you approve this Climate Action Plan. That you meet with other disenfranchised communities and those living in rural areas that were excluded from participating. Failing to hold inclusive meetings not only negatively impacts our environment it compounds the racial wealth gap. It enables predatory banks to exploit us and further enables multinational corporations to monopolies industries. Our coalition is calling for a moratorium on all proposed roundabouts in Unincorporated East LA and across the county were the outdated infrastructure has not been replaced and were the number of cars does not meet the vehicle threshold for a roundabout In East LA we have over 11,000,000 million cars a year going through our neighborhoods and the East LA Interchange. We can improve our intersections and provide safer pedestrian and vehicle intersections without increasing our carbon foot print. The roundabouts in our community were built wrong. They pose an eminent threat to pedestrians and motorist. The disabled ramps lead directly into the path of vehicles in the roundabouts.They remove much needed parking and now residents have to drive around searching for parking. They also negatively impact emergency response time. Roundabouts that were designed prior to the construction of an intersection are safer and more efficient than the ones that have been recently popping up everywhere. Finding loop holes to build them is not about safety at all. We

hope you contact us so that we can submit proper responses because now the information provided to the public was incomplete and fails to include data that we need in order to provide an adequate response to the issues that have killed us, are killing us and will continue to harm us if not remedied.

Por Mi Raza Habla Mi Espiritu!

Sofía G. Quiñones
Boyle Heights
East Los Angeles Coalition
(323)494-6005



January 31, 2022

Thuy Hua, Supervising Regional Planner
County of Los Angeles, Department of Regional Planning
320 West Temple St., 13th Floor
Los Angeles, CA 90012

submitted via electronic mail: climate@planning.lacounty.gov

Re: Building Industry Association (BIA-LAV) Comment Letter – 2045 Climate Action Plan – The Scope of the Pending Draft EIR based on the Initial Study; Need to Review Land Use Policies and Their Climate Change Implications vis-à-vis Housing and Population.

Dear Ms. Hua and Regional Planning Staff,

The Los Angeles/Ventura Chapter of the Building Industry Association of Southern California, Inc. (BIA-LAV) is a non-profit trade association that promotes and supports homebuilding activities in the Los Angeles and Ventura Counties. BIA-LAV and our members have long supported reasonable and balanced environmental policies, and sought to harmonize (i) the increasing need for additional housing to support our growing population with (ii) environmental sustainability, resiliency and goals. On behalf of our membership, we respectfully provide these comments concerning the scope of the pending environmental review of the County's update of its climate action plan, which will be referred to as the "2045 CAP." Specifically, the comments below respond to the initial study that was posted by the County.

There is increasing general acceptance of the reality that anthropogenic, global climate change ("GCC") is one of the most dire pressing challenges and that it must be addressed urgently and boldly. The State of California has long been ahead of the rest of our nation and most of the world's other nations in articulating such recognition. That said, the steps that could possibly be undertaken to address GCC would themselves each have myriad and profound consequences for our society and our citizenry at large.

As homebuilders, BIA-LAV's membership understands how challenging it will be to both address climate change and maintain standards of living. Moreover, we need to do more to raise standards of living for a great many citizens. Our society will need to undertake bold steps even if we were all to choose the best possible steps to address GCC. We will pay far more, however, if we were to take missteps, impose ill-considered measures, or adhere to existing public policies that are proven wrong in light of new data.

With that in mind, the County's pending study in advance of the 2045 CAP needs to be both circumspect and thorough so that all of the County's policies will (i) cohere and point accurately toward desired GCC benefits, while also (ii) best serve our region's population and benefit the economy on which we all depend. BIA-LAV respectfully asserts that the County would shirk its responsibilities under the California Environmental Quality Act (CEQA) if the draft environmental impact report (EIR) for the 2045 CAP were to not include a serious, thorough study of the impacts the Climate Action Plan will have on (i) **population and housing**, (ii) **land use and planning**, and (iii) all other potential environmental impacts (direct, indirect and cumulative) identified in Appendix G of the CEQA Guidelines. All such impacts should be scrutinized specifically through the lens of GCC and the need to reduce greenhouse gases (GHG) emissions.

There are three primary reasons why potentially significant environmental effects of the 2045 CAP on population and housing must be studied and reflected in the draft EIR for the 2045 CAP:

First, the preferred initial study for the pending 2045 CAP indicates that the County will study and potentially propose eliminating natural gas and propane heating and cooking from all new development in the unincorporated county. We recognize that such a general goal has been ambitiously embraced even before it has been studied in the context of more rigorous CEQA environmental review. Undoubtedly, however, any such measure would have profound impacts particularly on housing and population, as well as on land use and other impacts concerning which study is required pursuant to Appendix G of the CEQA Guidelines. Therefore, these considerations must be studied in the pending EIR.

Presently, the only available practical, large scale alternative to natural gas or propane heating is to use electric heat pumps. Federal studies have long indicated that electric heat pumps operate relatively inefficiently when ambient temperatures fall. One such federal study last decade indicated that efficiency drops when ambient temperatures fall below 45°. ¹ Although gradual technological improvements have been made and will presumably continue, it is nonetheless entirely foreseeable that electric heat pumps will continue to have relatively limited efficacy when ambient temperatures drop to low levels, which is inevitable by degree in many parts of the county. When this fact is combined with the fact that electrical power outages at different scales are inevitable from time to time, the County must recognize that such de-carbonization will inevitably require citizens to flee their homes from time to time for warmth. Homeowners already have limited or no use of wood burning fireplaces to comply with other environmental concerns.

¹ U.S. Department of Energy Office of Energy Efficiency & Renewable Energy, Measure Guideline: Heat Pump Water Heaters in New and Existing Homes (Feb. 2012), at 8 <https://www.nrel.gov/docs/fy12osti/53184.pdf>.

Therefore, any County mandate to “de-carbonized” heating will foreseeably have profound effect on (i) the utility of all new housing that is built subject to the proposed mandate (especially in colder parts of the county such as the more elevated north county), (ii) the quantum of new housing production, (iii) the consumer acceptance thereof, and (iv) population. We can all foresee inevitable disruptions – of different durations and however localized or widespread – in the electrical power supplies which would necessarily power electric heat pumps. Consequently, any requirement that all new housing in the unincorporated areas of the County must be “de-carbonized” would create serious life-safety issues for citizens who would reside in such housing. Such a policy would also have a profound impact on both the consumer-desirability and general economic viability of such new housing. For these reasons alone, the foreseeable effect of the projected 2045 CAP on housing, population and land use must be studied.

Second, the County’s ongoing land use policies, particularly as they relate to so-called “edge” or “greenfield” development (e.g., “new town” development or new suburban development), have evolved and been extended thus far without any meaningful and informed consideration of their GCC implications. The County continues to assume, for example, that heroic reductions in per capita vehicle miles traveled (VMT) should be pursued through increasingly constrictive land use restrictions and related incentives, and that concomitant GHG reductions will result from compelling far more transit-oriented urban redevelopment and largely curtailing suburban and exurban (new town) development. Such assumptions underlie the County’s recent update to the housing element of its general plan.

The most recent data show, however, that the County’s assumptions and conclusions about the GCC environmental effects of its land use policies are demonstrably incorrect. A growing body of compelling evidence shows that both jobs and housing demand are fleeing the more urbanized areas in favor of suburban and relatively bucolic “work from home” environs, accelerating a trend that was growing before the pandemic.² One recent study shows that COVID-19 pandemic has accelerated an antecedent trend towards urban exodus toward the suburbs, the exurbs, and significantly smaller cities – primarily in sunbelt states with less constrictive land use policies but also substantially higher per capita GHG emission rates.³ For

² Stephan D. Whitaker, “Did the COVID-19 Pandemic Cause an Urban Exodus?” Federal Reserve Bank of Cleveland, February 5, 2021, <https://www.clevelandfed.org/newsroom-and-events/publications/cfed-district-data-briefs/cfddb-20210205-did-the-covid-19-pandemic-cause-an-urban-exodus>.

³ Families and individuals are rapidly fleeing California in great numbers to move to far less GCC-caring states. Mark Calvey, “Census Finds Almost 1% of Californians Left the Golden State in Past Year,” San Francisco Business Times, December 21, 2021, <https://www.bizjournals.com/sanfrancisco/news/2021/12/21/census-finds-almost-1-of-californians-left-golden.html>.

example, between 2019 and 2021, U.S. consumer preference for larger homes in less dense areas grew from 53% to 60%.⁴

No new CAP can be thoughtfully completed without studying and taking into account its impact in light of Angelenos' evolving preferences for housing and lifestyle preferences, because the interplay of the CAP with these popular preferences will unquestionably affect both the County's population growth and retention and the potential realization of additional housing stock in the County, which themselves affect climate action. Moreover, given California's and the county's relatively superior transition to electric vehicle use and other vehicular fleet and fuel change, the County should, in order to best address GCC, be pursuing positive land use policies which accommodate potential population growth and discourage out-migration in concert with promoting fleet and fuel change.⁵

Third, new data has been garnered recently by the scientists worried about the increasingly ominous outlook for GCC concerning the GHG implications of different housing typologies and densities. One recent study on the topic of urban sustainability shows the life-cycle, per capita GHG impacts of taller buildings, such as those which are being strongly promoted by the existing land use policies throughout the County and the cities located within it, are GCC-harmful on a per capita, life-cycle basis when compared lower, less intense development.⁶ The study strongly indicates that the type of mid-rise and high-rise downtown development that is now being hyped by governmental regional planners is harmful from a life-cycle, per capita GHG standpoint. The study thus also indicates the need for Los Angeles County and its Department of Regional Planning to reconsider and reverse their singularly constrictive, centripetal, and urban-centric policies.

Such emerging data on land use patterns and GHG impacts call for a new, exhaustive and open-minded look at the County's land use policies. Given that the County must want to make the 2045 CAP as sound and effective as it can be, the County must carefully study, disclose to the public in the draft EIR, and take into account emerging data of the type discussed above. Thus,

⁴ Vianney Gomez, "More Americans now say they prefer a community with big houses, even if local amenities are farther away," Pew Research Center, August 26, 2021, <https://www.pewresearch.org/fact-tank/2021/08/26/more-americans-now-say-they-prefer-a-community-with-big-houses-even-if-local-amenities-are-farther-away/>.

⁵ As reflected in relatively recent studies by the federal government, California has the second lowest per capita energy-related CO₂ emissions amongst the 50 states. U.S. Energy Info. Admin., "Energy-Related Carbon Dioxide Emissions by State, 2005-2016," February 27, 2019, <https://www.eia.gov/environment/emissions/state/analysis/>.

⁶ Francesco Pomponi, "Decoupling Density from Tallness in Analysing the Life Cycle Greenhouse Gas Emissions of Cities," Nature Partners Journal – Urban Sustainability, July 5, 2021, <https://doi.org/10.1038/s42949-021-00034-w>.

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when preparing the draft EIR for the 2045 CAP, the County should both study broadly and reconcile the County's housing, population, land use, and achievable GHG reductions.

Notably, the County's policymakers will always retain discretion concerning county regional planning, housing policy and land use approvals. Their ongoing discretion will apply to general plan amendments and all relevant policies, as well as to all individual project approvals made and conditioning imposed – or not imposed – under CEQA (i.e., overriding considerations). Given the critical need to put in place the best and most carefully balanced policies to address GCC consistent with the broader goal of general betterment, BIA-LAV respectfully requests that the County study carefully and thoroughly the housing, population, land use and planning implications of the measures that are appropriate for the 2045 CAP. Thank you for your consideration and we look forward to the opportunity for further discussion.

Sincerely,



Carlos Rodriguez,
Chief Policy Officer
BIA Southern California

cc:

Supervisor Hilda L. Solis, 1st District
Supervisor Holly Mitchell, 2nd District
Supervisor Sheila Kuehl, 3rd District
Supervisor Janice Hahn, 4th District
Supervisor Kathryn Barger, 5th District



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Via Electronic Mail Only

January 31, 2022

Thuy Hua
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Subject: Notice of Preparation of a Draft Programmatic Environmental Impact Report for the Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP), SCH #2021120568, Los Angeles County Department of Regional Planning, Los Angeles County

Dear Ms. Hua:

The California Department of Fish and Wildlife (CDFW) has reviewed a Notice of Preparation (NOP) of Draft Programmatic Environmental Impact Report (PEIR) from the Los Angeles County Department of Regional Planning (DRP) for the Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) (Project). CDFW appreciates the opportunity to provide comments regarding aspects of the Project that could affect fish and wildlife resources and be subject to CDFW's regulatory authority under the Fish and Game Code.

CDFW's Role

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act (CEQA) Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect State fish and wildlife resources.

CDFW is also submitting comments as a Responsible Agency under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 *et seq.*). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by State law, of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 *et seq.*), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 *et seq.*), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Conserving California's Wildlife Since 1870

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Project Description and Summary

Objective: The Project proposes a General Plan Amendment to replace the Los Angeles County (County) Community Climate Action Plan with the Draft 2045 CAP. The Draft 2045 CAP would be a policy document intended to reduce unincorporated County-wide greenhouse gas (GHG) emissions. The Draft 2045 CAP would demonstrate how local actions can support goals to reduce GHG emissions and ensure that the County's reduction of GHG emissions aligns with State goals to reduce GHG emissions and the Our County Sustainability Plan.

The Draft 2045 CAP would be modeled with the land use assumptions, policies and implementation programs found within the General Plan (including the current 6th Cycle 2021-2029 Housing Element), as well as within other County projects and programs. The Draft 2045 CAP would include an updated GHG emissions inventory for 2018; new emissions forecasts for 2030, 2035, and 2045; new GHG emissions targets for 2030, 2035, and 2045; a revised suite of GHG reduction strategies, measures, and actions; a technical modeling appendix to explain the Draft 2045 CAP's GHG reduction estimates; a consideration of environmental justice and equity concerns; and a new development review consistency checklist to allow projects to streamline CEQA compliance by using the Draft 2045 CAP (CEQA Guidelines, § 15183.5). The Draft 2045 CAP is anticipated to include approximately 26 recommended GHG reduction measures. The recommended GHG reduction measures are to be organized under five main categories and 11 strategies listed below.

- 1) Climate Leadership
 - Strategy 1: Lead by example towards carbon neutrality
- 2) Transportation
 - Strategy 2: Increase densities and diversity of destinations with an emphasis near transit
 - Strategy 3: Reduce single-occupancy vehicle trips
 - Strategy 4: Institutionalize low-carbon transportation
- 3) Building Energy & Water
 - Strategy 5: Decarbonize buildings and energy use
 - Strategy 6: Increase generation and resilience of renewable energy
 - Strategy 7: Improve efficiency of building energy use
 - Strategy 8: Promote water conservation
- 4) Waste
 - Strategy 9: Reduce and divert waste
- 5) Agriculture, Forestry, and Other Land Use
 - Strategy 10: Conserve Forests and Working Lands
 - Strategy 11: Promote Carbon Sequestration and Sustainable Agriculture

Individual projects implementing Draft 2045 CAP measures are anticipated to be located primarily within the urban environments and on disturbed areas with existing infrastructure. These include a majority of the Draft 2045 CAP measures promoting transportation option, institutionalizing low-carbon transportation, promoting water conservation, and increasing renewable energy. However, some of the Draft 2045 CAP measures would promote implementation projects including transit routes, electric vehicle chargers, water recycling systems, solar energy generation facilities, and waste management facilities. Depending on the

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location of the implementing projects, construction could result in impacts on biological resources.

Location: Implementation of the Project would occur throughout unincorporated Los Angeles County in all General Plan, Community Plan, Area Plan, and zoning designations.

Comments and Recommendations

CDFW offers the comments and recommendations below to assist DRP in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. The PEIR should provide adequate and complete disclosure of the Project's potential impacts on biological resources [Pub. Resources Code, § 21061; CEQA Guidelines, §§ 15003(i), 15151]. CDFW looks forward to commenting on the PEIR when it is available.

Specific Comments

- 1) Biological Resources Assessment for Individual Projects. CDFW recommends the PEIR include a requirement where projects implementing Draft 2045 CAP measures provide a biological resources assessment (see General Comment #3). A biological resources assessment should include a discussion of a project's potential impact on biological resources including, but not limited to, biological resources discussed in Comments #2 through 9 below. Based on the results of the biological resources assessment, a qualified biologist should prepare species- and site-specific measures to avoid, minimize, and/or mitigate for a project's potentially significant impacts on biological resources.
- 2) Biological Resources in the Antelope Valley. The Project could potentially result in installation of new solar energy generation facilities on County-owned land. Siting, construction, decommissioning, and operational activities associated with solar array installations, as well as transmission facilities, result in loss of native vegetation and habitat for wildlife (ICF 2019). CDFW is concerned that new solar energy generation facilities installed in the Antelope Valley region could result in significant habitat loss and impact special status, rare, and sensitive species of plants and wildlife, including (but not limited to) the following: Swainson's hawk (*Buteo swainsonii*), Mohave ground squirrel (*Xerospermophilus mohavensis*), desert tortoise (*Gopherus agassizii*), burrowing owl (*Athene cunicularia*), western Joshua tree (*Yucca brevifolia*), and alkali mariposa lily (*Calochortus striatus*).
 - a) Analysis and Disclosure. As part of the PEIR's evaluation of the Project's impact on biological resources, CDFW recommends the PEIR provide a focused discussion on the Project's potential impact on biological resources in the Antelope Valley. At a minimum, the PEIR should discuss the Project's impact on focal species identified on Table 2-2 in the CDFW-approved final [Antelope Valley Regional Conservation Investment Strategy](#) (AVRCIS) (ICF 2019). The PEIR should also discuss the Project's impact on other conservation elements identified in the AVRCIS, which includes habitat connectivity, farmlands, rangelands, and natural communities.
 - b) Mitigation. CDFW recommends the PEIR include measures that require individual projects to mitigate for impacts on special status, rare, and sensitive species of plants

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and wildlife and natural communities in the AVRCIS area. Mitigation measures should be consistent with conservation strategies identified in the AVRCIS. If the DRP proposes in-lieu fees or a form of mitigation payment as mitigation, the PEIR should thoroughly discuss why DRP's proposal is adequate to mitigate for impacts to these biological resources. At a minimum, the PEIR should discuss the following: 1) how the fee/fund is designed to (and will) mitigate the effects at issue at a level meaningful for purposes of CEQA; 2) why the fee/fund is appropriate for mitigating the cumulative loss of habitat; 3) why the fee/fund is sufficient to purchase land or credits at a mitigation bank; 4) where land may be acquired or where credits may be purchased; 5) when fee/fund would occur/be used; and, 6) why the fee/fund would be adequate such that no impacts would occur/no net loss of habitat. Adequate disclosure is necessary to identify the nexus between the mitigation proposed and the impacts that may occur and allow CDFW to review and provide comments on the adequacy of the mitigation proposed.

- 3) Wildlife Corridors. The Project area may overlap with wildlife corridors and linkages identified in the [South Coast Missing Linkages Project](#) (SCW 2021). Some of these corridors such as the San Gabriel Castaic corridor have experienced some connectivity loss or is threatened due to development and transportation projects. Development including installation of solar energy generation facilities potentially proposed by the Project, especially on undeveloped County-owned land, could introduce new/additional barriers to dispersal and constrain wildlife corridors and pinch points leading to severed migration.
 - a) Analysis and Disclosure: The PEIR should discuss the Project's potential impact and cumulative impact on wildlife corridors. The PEIR should discuss impacts from the standpoint of the following: 1) introducing new/additional barriers to dispersal; 2) constraining wildlife corridors and pinch points leading to severed migration; 3) habitat loss, fragmentation, and encroachment; and 4) increased human presence, noise, and lighting.
 - b) Avoidance. The PEIR should include a measure whereby individual projects should first avoid impacts wildlife corridors through planning efforts to locate projects outside of wildlife corridors.
 - c) Mitigation. If avoidance is not feasible, CDFW recommends the PEIR include measures that require individual projects to provide compensatory mitigation for impacts on wildlife corridors. If the DRP proposes in-lieu fees or a form of mitigation payment as mitigation, the PEIR should thoroughly discuss why DRP's proposal is adequate to mitigate for impacts to these biological resources (see Comment #2b).

- 4) Impact on Mountain Lion (*Puma concolor*). Mountain lion occurs in the Project area. Installation of solar energy generation facilities potentially proposed by the Project, especially on undeveloped County-owned land, could impact mountain lion through habitat loss and fragmentation, as well as introduce new/additional barriers to mountain lion dispersal.
 - a) Protection Status: The mountain lion is a specially protected mammal in the State (Fish and G. Code, § 4800). In addition, on April 21, 2020, the California Fish and Game Commission accepted a petition to list the Southern California/Central Coast Evolutionary Significant Unit of mountain lion as threatened under CESA (CDFW 2020).

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As a CESA candidate species, the mountain lion in southern California is granted full protection of a threatened species under CESA.

- b) Analysis and Disclosure. The PEIR should discuss the Project's potential impact on mountain lion. The PEIR should discuss impacts from the standpoint of the following: 1) introducing new/additional barriers to dispersal; 2) constraining wildlife corridors and pinch points leading to severed migration; 3) habitat loss, fragmentation, and encroachment; and 4) increased human presence, noise, and lighting.
- c) Individual Project-Level Impact Assessment. CDFW recommends the PEIR include a measure that requires individual projects to evaluate impacts on mountain lion. Individual project-level evaluations should be supported by an analysis on mountain lion movement, territory size, and habitat use within and surrounding the project vicinity. CDFW recommends using wildlife cameras to aid in identification of areas that may be important to mountain lion movement.
- d) Avoidance and Mitigation. CDFW recommends avoidance and mitigation consistent with Comment #3b and 3c.
- e) Use of Rodenticides. CDFW recommends DRP prohibit all subsequent projects implementing Draft 2045 CAP measures from using any second generation anticoagulant rodenticides. Second generation anticoagulant rodenticides are known to have harmful effects on the ecosystem and wildlife. Assembly Bill 1788 prohibits the use of any second generation anticoagulant rodenticides because second generation anticoagulant rodenticides have a higher toxicity and are more dangerous to nontarget wildlife such as mountain lions, bobcats, foxes, and coyotes (California Legislative Information 2020).
- f) CESA. CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or CESA-listed plant species that results from a project is prohibited, except as authorized by State law (Fish & G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if a project and any project-related activity during the life of a project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a Consistency Determination in certain circumstances, among other options [Fish & Game Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to the project and mitigation measures may be required to obtain an ITP. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the project's CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for an ITP.

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- 5) Woodlands. The Project area (unincorporated Los Angeles County) encompasses native woodlands that include (but are not limited to) California walnut groves (*Juglans californica* Woodland Alliance); oak woodlands (*Quercus* genus Woodland Alliance); California bay forest (*Umbellularia californica* Forest Alliance); California sycamore woodlands (*Platanus racemosa* Woodland Alliance); Fremont cottonwood forest (*Populus fremontii* Forest Alliance); and willow thickets (*Salix* Shrubland or Woodland Alliance).
- a) Sensitive Natural Communities. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level (see General Comment #3a). CDFW considers sensitive natural communities as threatened habitats having both regional and local significance.
- i. California walnut groves is a sensitive natural community with a rarity ranking of S3.2 (CDFW 2022a; Sawyer et al. 2009). California walnut groves are only found in southern California where this natural community has been significantly reduced due to urban development, type conversion, and agriculture.
 - ii. Some oak woodland alliances have a rarity ranking of S1, S2, or S3. While the coast live oak (*Quercus agrifolia* Woodland Alliance) has a rarity ranking of S4, some associations are rare (S1, S2, or S3) (Sawyer et al. 2009). Oak woodlands serve several important ecological functions such as protecting soils from erosion and land sliding, regulating water flow in watersheds, and maintaining water quality in streams and rivers. Oak woodlands also have higher levels of biodiversity than any other terrestrial ecosystem in California. Over 330 species of birds, mammals, reptiles, and amphibians depend on oak woodlands in California at some stage in their life cycle (CalPIF 2002). Moreover, oak woodlands are protected by the Oak Woodlands Conservation Act (pursuant under Fish and Game Code sections 1360-1372) and Public Resources Code section 21083.4 due to the historic and on-going loss of these resources. The percentage of oak woodlands that are developed in southern California is higher than in any other part of the State (Gaman and Firman 2006).
- b) Analysis and Disclosure. The PEIR should discuss the Project's potential impact on Sensitive Natural Communities occurring within the Project area. Natural community names should be provided in accordance with the [Manual of California Vegetation](#) (MCV), second edition (Sawyer et al. 2009).
- c) Avoidance. CDFW recommends the PEIR include measures that require individual projects to avoid impacts on sensitive natural communities. Mitigation may include avoiding impacts by establishing effective setbacks. If the DRP proposes buffers/setbacks as mitigation for all subsequent individual projects, the PEIR should provide justification for the effectiveness of chosen buffer/setback distances to avoid impacts on sensitive natural communities. An appropriate buffer/setback should avoid direct and indirect impacts on sensitive natural communities, allow for population connectivity and expansion, and protect processes supporting sensitive natural communities such as hydrological processes in the case of California walnut groves.
- d) Compensatory Mitigation. If avoidance is not feasible, the PEIR should require individual projects to provide compensatory mitigation for impacts on sensitive natural communities at no less than 2:1. DRP should require higher mitigation for project-level impacts on S1

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and S2-ranked natural communities and natural communities that are locally rare. Impacts due to fuel modification or trimming should also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. There should be no-net loss of individual trees and habitat acres for California walnut groves and oak woodland. Mitigation should be provided for both individual trees and habitat acres. The replacement of individual trees is inadequate to mitigate for the loss of habitat.

- 6) Stream Delineation and Impact Assessment. The Project area (unincorporated Los Angeles County) encompasses many watersheds, rivers, waterbodies, and tributaries including (but not limited to) the Los Angeles River watershed, Northern Mojave River watershed, Ventura–San Gabriel Coastal watershed, Los Angeles River, Santa Clara River, San Gabriel River, Tujunga Creek, Castaic Creek, and desert dry washes in the Antelope Valley region.
- a) Fish and Game Code section 1600 et. seq. CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities.
 - b) Analysis and Disclosure. The PEIR should discuss the Project's potential impact on rivers, streams, or lakes¹ and associated natural communities. Impacts may include (but not limited to) the following: channelizing or diverting a stream; impairing a watercourse; Project-related activities causing erosion; removing vegetation adjacent to a water course; and degrading vegetation through habitat modification (e.g., loss of water source, encroachment, and edge effects leading to introduction of non-native plants). CDFW recommends the PEIR include a fine-scale stream delineation within the Project area to the extent feasible as part of the PEIR's evaluation of the Project's impact on rivers, streams, or lakes and a list of associated natural communities. Natural community names should be provided in accordance with the MCV, second edition (Sawyer et al. 2009).
 - c) Individual Project-Level Impact Assessment. CDFW recommends the PEIR include a measure that require individual projects to provide a stream delineation and evaluate impacts on any river, stream, or lake and associated natural communities. The delineation should be conducted pursuant to the U.S Fish and Wildlife Service's (USFWS) wetland definition adopted by CDFW (Cowardin et al. 1979). Be advised that some wetland and riparian habitats subject to CDFW's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers' Section 404 permit and Regional Water Quality Control Board Section 401 Certification.
 - d) Mitigation. CDFW recommends the PEIR include measures that require individual projects to mitigate for impacts on streams and associated natural communities. Mitigation may include avoiding impacts by establishing effective unobstructed vegetated buffers and setbacks adjoining streams and associated natural communities. If the DRP proposes buffers and setbacks as mitigation for all subsequent individual projects, the

¹ "Any river, stream, or lake" includes those that are dry for periods of time (ephemeral/episodic) as well as those that flow year-round (perennial). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a water body.

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PEIR should provide justification for the effectiveness of chosen buffer and setback distances to avoid impacts on the stream and associated natural communities. If avoidance is not feasible, the PEIR should require individual projects to provide compensatory mitigation for impacts on streams and associated natural communities at no less than 2:1. DRP should require higher mitigation for project-level impacts on sensitive natural communities (see General Comment #3a) and presence of rare, sensitive, or special status flora and fauna.

- e) Lake and Streambed Alteration (LSA) Agreement. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, CDFW recommends the PEIR include a measure that requires individual projects to notify CDFW pursuant to Fish and Game Code section 1602. CDFW should be notified prior to starting activities that may impact streams, and the project should obtain an LSA Agreement² prior to starting project activities. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage for more information (CDFW 2022b).
- 7) Water Recycling Systems. Some of the Draft 2045 CAP measures would promote implementation projects including water recycling systems. Water recycling systems that would capture and infiltrate local dry and wet season runoff would divert water from local watercourses. A reduction in dry and wet season flow could impact biological resources depending on the flow. Impacts on biological resources could occur in the immediate project area and downstream from the project area.
- a) Analysis and Disclosure. The PEIR should discuss the Project's potential impact of water recycling systems on watercourses and biological resources. The PEIR should provide information on the type(s) of water recycling systems that would be installed; where water recycling systems would be located in relation to rivers, streams, and lakes in the Project area; the approximate volume of water that would be captured and diverted resulting from the Project; and what biological resources could be impacted by water recycling systems.
- b) Individual Project-Level Impact Assessment. CDFW recommends the PEIR include a measure that requires individual projects resulting in water recycling systems to provide an analysis of impacts on flow and evaluate changes in flow and hydraulics on biological resources. An adequate analysis should provide the following information at a minimum: 1) an adequate study reach in order to analyze changes in flow in the immediate project area and downstream; 2) flow and hydraulics (e.g., water depth, wetted perimeter, and velocity) during the wet season (November through March), dry season (April through October), and both above-average and below-average water year (i.e., wet

² CDFW's issuance of a LSA Agreement for a project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the environmental document of the local jurisdiction (lead agency) for the project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the environmental document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSA Agreement.

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season/above-average water year, wet season/below-average water year, dry season/above-average water year, and dry season/below-average water year) under pre-project (i.e., baseline conditions) and post-project conditions; 3) percent changes in flow, water depth, wetted perimeter (acres gained/lost), and velocity (percent change) under project condition; 4) a list of sensitive and special status plant and wildlife species, including natural communities that could be impacted; and 5) project-related impacts on biological resources in relation to cumulative flow reductions. CDFW recommends such analysis and evaluation apply a [function flows approach](#) to evaluate impacts on biological resources. The functional flows approach provides the basis for guidance provided in the [California Environmental Flows Framework](#) (UC Davis 2022). Functional flows are distinct aspects of a natural flow regime that sustain ecological, geomorphic, or biogeochemical functions, and that support the specific life history and habitat needs of native aquatic species. Retaining key functional flow components in managed flow regimes is thus expected to support foundational physical and ecological processes that sustain biological communities

- c) Mitigation. CDFW recommends the PEIR include measures that require individual projects to mitigate for impacts on biological resources resulting from water recycling systems. Mitigation may include notifying CDFW and obtaining an LSA Agreement pursuant to Fish and Game Code section 1602 (see Comment #6).
- 8) Nesting Birds. Individual projects implementing Draft 2045 CAP measures that would require vegetation removal and/or disturbance could impact nesting birds. Construction could create elevated levels of noise, human activity, dust, ground vibrations, and vegetation disturbance. These activities occurring near potential nests could cause birds to abandon their nests and a decrease in feeding frequency, both resulting in the loss of fertile eggs or nestlings.
- a) Protection Status. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (Code of Federal Regulations, Title 50, § 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the MBTA). It is unlawful to take, possess, or needlessly destroy the nest or eggs of any raptor.
- b) Analysis and Disclosure. The PEIR should discuss the Project's potential impact on nesting birds and raptors. A discussion of potential impacts should include impacts that could occur during construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal associated with implementation of individual projects.
- c) Avoidance. CDFW recommends that the PEIR include measures that require individual projects to fully avoid impacts on nesting birds and raptors. To the extent feasible, no construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal should occur during the avian breeding season which generally runs from February 15 through September 15 (as early as January 1 for some raptors) to avoid take of birds, raptors, or their eggs.
- d) Minimizing Potential Impacts. If impacts on nesting birds and raptors cannot be avoided, CDFW recommends the PEIR include measures that require individual projects to

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minimize impacts on nesting birds and raptors during implementation of individual projects. Prior to starting ground-disturbing activities and vegetation removal, CDFW recommends a qualified biologist conduct nesting bird and raptor surveys to identify nests. The qualified biologist should establish no-disturbance buffers to minimize impacts on those nests. CDFW recommends a minimum 300-foot no-disturbance buffer around active bird nests. For raptors, the no-disturbance buffer should be expanded to 500 feet and 0.5 mile for special status species, if feasible. Personnel working on a project, including all contractors working on site, should be instructed on the presence of nesting birds, area sensitivity, and adherence to no-disturbance buffers. Reductions in the buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors determined by a qualified biologist.

- 9) Bats. Numerous bat species are known to roost in trees and structures throughout Los Angeles County. Individual projects implementing Draft 2045 CAP measures that would require removal and/or disturbance of vegetation and other potential roosting structures could impact bats. Removal of trees, vegetation, and/or structures supporting roosting bats could result in injury and/or mortality of bats, as well as loss of roosting habitat. Bats and roosts could also be impacted by increased noise, human activity, dust, and ground vibrations during construction and ground-disturbing activities.
 - a) Protection Status. Bats are considered non-game mammals and are afforded protection by State law from take and/or harassment (Fish & G. Code, § 4150; Cal. Code of Regs., § 251.1). In addition, some bats are considered California Species of Special Concern (SSC). CEQA provides protection not only for CESA-listed species, but for any species including but not limited to SSC which can be shown to meet the criteria for State listing. These SSC meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Take of SSC could require a mandatory finding of significance (CEQA Guidelines, § 15065).
 - b) Analysis and Disclosure. The PEIR should discuss the Project's potential impact on bats and habitat supporting roosting bats. A discussion of potential impacts should include impacts that may occur during Project construction, ground-disturbing activities (e.g., mobilizing, staging, drilling, and excavating), and vegetation removal.
 - c) Avoidance and Minimization. CDFW recommends that the PEIR include measures that require individual projects to avoid and/or minimize impacts on bats during implementation of individual projects. Prior to project implementation, CDFW recommends that DRP require individual projects to retain a qualified bat specialist to identify potential daytime, nighttime, wintering, and hibernation roost sites within the project site, and conduct bat surveys within these areas (plus a 100-foot buffer as access allows) to identify roosting bats and any maternity roosts. CDFW recommends using acoustic recognition technology to maximize detection of bats. The PEIR should incorporate mitigation measures in accordance with [California Bat Mitigation Measures](#) (Johnston et al. 2004).

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General Comments

- 1) Disclosure. The PEIR should provide an adequate, complete, and detailed disclosure about the effect which the proposed Project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Adequate disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as to assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 2) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures [CEQA Guidelines, §§ 15002(a)(3), 15021]. Pursuant to CEQA Guidelines section 15126.4, an environmental document “shall describe feasible measures which could mitigate for impacts below a significant level under CEQA.”
 - a) Level of Detail. Mitigation measures must be feasible, effective, implemented, and fully enforceable/imposed by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). A public agency “shall provide the measures that are fully enforceable through permit conditions, agreements, or other measures” (Pub. Resources Code, § 21081.6). CDFW recommends DRP provide mitigation measures that are specific, detailed (i.e., responsible party, timing, specific actions, location), and clear in order for a measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).
 - b) Disclosure of Impacts. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the PEIR should include a discussion of the effects of proposed mitigation measures [CEQA Guidelines, § 15126.4(a)(1)]. In that regard, the PEIR should provide an adequate, complete, and detailed disclosure about the Project’s proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.
- 3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project area and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project’s potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to an SSC a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The PEIR should include the following information:
 - a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region [CEQA Guidelines, § 15125(c)]. The PEIR should include measures to fully avoid and otherwise

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protect Sensitive Natural Communities. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#) webpage (CDFW 2022a);

- b) A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#) (CDFW 2018). Adjoining habitat areas should be included where the Project's construction and activities could lead to direct or indirect impacts off site;
- c) Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project area and within adjacent areas. The [Manual of California Vegetation](#), second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2009). Adjoining habitat areas should be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts off site;
- d) A complete and recent assessment of the biological resources associated with each habitat type in the Project area and within adjacent areas. CDFW's [California Natural Diversity Database](#) in Sacramento should be contacted to obtain current information on any previously reported sensitive species and habitat (CDFW 2022c). An assessment should include a minimum nine-quadrangle search of the CNDDDB to determine a list of species potentially present in the Project area. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review [CEQA Guidelines, § 15003(i)];
- e) A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project area and adjacent areas, including SSC and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of the Project area should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See CDFW's [Survey and Monitoring Protocols and Guidelines](#) for established survey protocol for select species (CDFW 2022d). Acceptable species-specific survey procedures may be developed in consultation with CDFW and USFWS; and,
- f) A recent wildlife and rare plant survey. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame

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or in phases.

- 4) Biological Direct, Indirect, and Cumulative Impacts. The PEIR should provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources with specific measures to offset such impacts. The PEIR should address the following:
 - a) A discussion regarding Project-related indirect impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the PEIR;
 - b) A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted [CEQA Guidelines, § 15126.2(a)];
 - c) A discussion of potential adverse impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures;
 - d) A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat (if any) supported by the groundwater. Measures to mitigate such impacts should be included;
 - e) An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the PEIR; and,
 - f) A cumulative effects analysis as described under CEQA Guidelines section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant and wildlife species, habitat, and natural communities. If DRP determines that the Project would not have a cumulative impact, the PEIR should indicate why the cumulative impact is not significant. DRP's determination should be supported by facts and analyses [CEQA Guidelines, § 15130(a)(2)].
- 5) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the PEIR:
 - a) A complete discussion of the purpose and need for, and description of the proposed Project;

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- b) Pursuant to CEQA Guidelines section 15126.6(a), an environmental document “shall describe a reasonable range of potentially feasible alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project.” CEQA Guidelines section 15126.6(f)(2) states if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion; and,
- c) A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends DRP select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends DRP consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.

Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or would be more costly (CEQA Guidelines, § 15126.6). The PEIR “shall” include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

- d) Where the Project may impact aquatic and riparian resources, CDFW recommends DRP select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level and cause the watercourse to alter its course of flow.
- 6) Data. CEQA requires that information developed in environmental impact reports be incorporated into a database which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Accordingly, please report any special status species and natural communities detected by completing and submitting [CNDDDB Field Survey Forms](#) (CDFW 2022e). To submit information on special status native plant populations and sensitive natural communities, the [Combined Rapid Assessment and Releve Form](#) should be completed and submitted to CDFW’s Vegetation Classification and Mapping Program (CDFW 2022f). DRP should ensure data collected for the preparation of the PEIR be properly submitted, with all data fields applicable filled out.
 - 7) Use of Native Plants and Trees. CDFW supports the use of native plants for any project proposing revegetation and landscaping. CDFW strongly recommends avoiding non-native, invasive plants for landscaping and restoration, particularly any species listed as ‘Moderate’

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or 'High' by the [California Invasive Plant Council](#) (Cal-IPC 2022). CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project area. In addition, CDFW supports planting species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

- 8) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation is the process of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. Studies have shown that these efforts are experimental and the outcome unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.
- 9) Compensatory Mitigation. The PEIR should include compensatory mitigation measures for the Project's significant direct and indirect impacts to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code, section 65967, the Lead Agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.
- 10) Long-term Management of Mitigation Lands. For proposed preservation and/or restoration, the PEIR should include measures to protect the targeted habitat values from direct and indirect negative impacts in perpetuity. The objective should be to offset Project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate non-wasting endowment should be set aside to provide for long-term management of mitigation lands.
- 11) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies. The [Wetlands Resources](#) policy the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement and expansion of wetland habitat in California" (CFGC 2020). Further, it is the policy of the Fish and Game Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum,

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project mitigation assures there will be ‘no net loss’ of either wetland habitat values or acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values.”

- a) The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a “no net loss” of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the PEIR and these measures should compensate for the loss of function and value.
- b) The Fish and Game Commission’s Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

Conclusion

We appreciate the opportunity to comment on the NOP for the Los Angeles County 2045 Climate Action Plan to assist the Los Angeles County Department of Regional Planning in preparing the Project’s environmental document and identifying and mitigating the Project’s potential impacts on biological resources. If you have any questions or comments regarding this letter, please contact Ruby Kwan-Davis, Senior Environmental Scientist (Specialist), at Ruby.Kwan-Davis@wildlife.ca.gov or (562) 619-2230.

Sincerely,

DocuSigned by:

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Erinn Wilson-Olgin
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February 1, 2022

Dear LA County Board of Supervisors:

On behalf of the County's independent oil and natural gas producers and the thousands of essential oil and gas workers who work and live here, the California Independent Petroleum Association is submitting these comments outlining our serious concerns regarding the draft Climate Action Plan (CAP). In its current form, the CAP would not only have severe impacts on the region's economy and industries that support good paying labor jobs, but would also have unintended consequences on our most underserved and vulnerable communities. We urge you to reject any actions that would increase energy prices and imported resources, destabilize the region's energy reliability, or eliminate local living wage jobs.

The County of Los Angeles continues to be the epicenter of our nation's affordability and homelessness crises. The cost of everyday necessities like housing, childcare and transportation are crushing working families. As it stands, California has the highest-in-the-nation gas prices at nearly \$5 per gallon and our nation is facing inflation rates we have not seen in 40 years.

The Los Angeles County Department of Regional Planning (DRP) has released its Notice of Preparation and Initial Study for its draft CAP. Under Strategy 1, Measure CL 1 would develop a sunset strategy for all oil and gas operations. In its Initial Study, the applicant (DRP) does not address the potentially significant environmental impacts to energy, population/housing and land use/planning. In addition, as we continue to address inequity, it seems short-sighted to not include the scope of "quality of life and workforce impacts" as part of its environmental analysis.

This Initial Study does not address the energy dependence and instability caused to the County by shutting down local production. As noted before, we continue to have serious concerns that this recommendation will put millions of Angelenos' access to affordable and reliable energy at risk. A shutdown of local oil and gas production will increase the region's dependency on expensive foreign oil imports from regimes that do not hire Angelenos, pay California taxes or operate under our stringent environmental, safety and labor standards. The truth is that despite having enormous energy resources in the County and the State, California is now more

dependent than ever on imported foreign energy. Our state imports more than 60% of its crude oil consumption from foreign sources – a 1,200% increase since the 1980s.

In 2018, Californians sent \$24 billion to foreign countries to pay for imported oil. That figure will increase if the County shuts down local production. In fact, what we have learned from our current health pandemic is that we must ensure we can deliver daily necessities across industrial sectors, including energy, to avoid shortages that can quickly become life-threatening. Further curtailing oil and gas production in the County would leave the County and the State completely beholden to foreign countries that do not share our same environmental, labor and safety protections to meet our energy needs.

These foreign imports would deprive us of the local economic benefits generated by utilizing nearby energy sources and would also add to our deteriorating air quality. As noted by the *Los Angeles Times* Editorial Board during the start of the supply chain crisis, “The ports of Los Angeles and Long Beach are the single latest source of pollution in the nation’s smoggiest area. The communities around the ports have the highest cancer risk from air pollution in the region...And air quality has been getting worse, not better, in recent years.”

Banning production statewide would translate into an additional 160 million barrels of oil imports to California annually. At minimum, that would require an additional 80 oil tankers to unnecessarily traverse the planet and idle in Southern California ports, adding to our region’s air pollution.

In addition to the environmental impacts, an analysis released by the State Building and Construction Trades Council of California earlier this year found that gas prices would increase by a minimum of \$1.70 per gallon under a statewide shutdown. Gas prices could soar to \$10 or more per gallon if foreign supply challenges emerge after production shutdowns are implemented. Global energy markets are currently facing turmoil thanks to concerns that Russia may invade Ukraine. Markets were also recently rattled by attacks on tankers exiting the Middle East as well as delays caused by blocked shipping routes.

Lastly, the County’s Sustainability Office still has not performed a much needed data-based study/report on the County’s resiliency or lack thereof. The County should have a data-driven understanding of its ability to produce and deliver food, water, energy, medicine, building materials, transportation and daily necessities to 10 million County residents in good times and during disasters. We continue to highlight the need for staff to measure strategies against resiliency and the County’s ability to recover from unforeseen circumstances. As already mentioned, without local production of oil and gas, the region will become solely dependent on foreign crude oil, which during times of crisis is not dependable and leaves Angelenos vulnerable to price spikes or supply disruptions at the whim of foreign countries. We are seeing firsthand the inflation rates that disproportionately impact disadvantaged communities and communities of color.

The Board of Supervisors unanimously recognized the importance of resiliency in its motion of August 13, 2019. Noting the need for “further analysis of the resiliency of the County’s energy supply against natural disasters, international turmoil, power outages, cyber-attacks, transportation disruptions and price spikes,” the Board required a report on “both the current status of resiliency of the County’s energy supply and infrastructure and ... the potential ... impacts of decarbonization.” The study that was generated by the Chief Sustainability Office was a “literature review” without any substantive analysis and research. Given the multiple and widespread infrastructure and supply chain failures we have seen just in the last couple of years during this unprecedented global pandemic, it is more vital than ever to ensure that the County takes resiliency and crisis planning into consideration as part of its environmental analysis.

We recognize that California is transitioning its energy economy, but the County cannot allow energy policies to jump ahead of its energy reality and consumption. California still demands massive amounts of oil – and will for decades to come – to fuel transportation, provide reliable electricity to the grid, grow and transport food, power businesses that provide jobs, and produce thousands of consumer products that make our lives possible. To jump ahead of reality means eliminating thousands of high-skilled labor jobs and ignoring the environmental impact of import logistics, all while everyday Angelenos still recovering from the pandemic bear the burden of an inevitable increase in costs.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rock Zierman', with a stylized flourish extending to the right.

Rock Zierman
Chief Executive Officer, CIPA



February 1, 2022

Sent via email

Thuy Hua, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
climate@planning.lacounty.gov

Re: Comments on Notice of Preparation of a Program Environmental Impact Report for the Los Angeles County 2045 Climate Action Plan

Dear Department of Regional Planning:

The Center for Biological Diversity (“Center”) submits the following comments on the Notice of Preparation (“NOP”) of a Program Environmental Impact Report (“PEIR”) for the Los Angeles County 2045 Climate Action Plan (“CAP”). The Center submitted comments on an earlier version of the draft CAP on April 30, 2020 (the “April 2020 Letter”), which is attached here as Exhibit 1. We hereby incorporate the comments in the April 2020 Letter by reference and request that the issues raised in that letter be considered in preparing the Draft EIR and revised CAP. We appreciate that the upcoming draft of the CAP will include “more clear, specific, feasible, and quantifiable” greenhouse gas (“GHG”) reduction strategies, as we requested in the April 2020 Letter.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over one million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County (“County”).

I. The Draft PEIR and CAP Should Explain How It is Consistent with Statewide Goals.

CEQA Guidelines section 15183.5(b)(1)(D) require that a climate action plan demonstrate that it will achieve planned reductions on a project by project basis. In *Cleveland National Forest Foundation v. San Diego Association of Governments*, the California Supreme Court provided more clarity on what facts, data, and goals projects should analyze in their greenhouse gas analyses under CEQA. ((2017) 3 Cal.5th 497.) The Court found that although an “Executive Order ‘is not an adopted GHG reduction plan’ and that ‘there is no legal requirement to use it as a threshold of significance[,]’ ... [t]he Executive Order’s 2050 goal of reducing California’s greenhouse gas emissions to 80 percent below 1990 levels expresses the pace and magnitude of reduction efforts that the scientific community believes necessary to stabilize the climate. This scientific information has important value to policymakers and citizens in considering the emission impacts of a project like SANDAG’s regional transportation plan.” (*Id.* at 515-516.) Therefore, the Draft CAP should include further discussion on measures that could ensure the County meets statewide goals, including in the Scoping Plan published by California Air Resources Board (“CARB”) and in executive orders on GHGs.

II. The Draft PEIR and CAP Should Include Binding and Enforceable Measures.

We appreciate that the County intends that the Draft PEIR and CAP include “more clear, specific, feasible, and quantifiable” GHG reduction strategies. We look forward to reviewing these strategies in the Draft PEIR and CAP and proposing recommendations to further improve and refine them. As outlined in the Draft CAP, a CAP must “[s]pecify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level...” (Draft CAP at 15.) We again caution that the Draft CAP should not include non-binding language in its mitigation measures (e.g., “encourage,” “promote,” “support” or “whenever feasible”).

The Draft PEIR and CAP should also include evidence describing how they will include sufficient funding and staff to carry out the programs and mitigation strategies included in the Draft PEIR and CAP. (See, e.g., *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1116-1118 [EIR invalid because agency offered no evidence that measures for reducing impacts would actually be effective].)

III. The Draft PEIR and CAP Should Demonstrate How They Are Consistent with the LA County Sustainability Plan.

CEQA requires that EIRs disclose and discuss the project or program’s inconsistencies with an applicable regional plan, such as a habitat conservation plan or natural community conservation plan. (CEQA Guidelines § 15125(d); 1 Kostka & Zischke, Practice Under the Cal. Env. Quality Act (2d ed. 2015) § 6.56, p. 6-60.1.) The EIR should thus include a detailed analysis of the CAP’s consistency with the LA County Sustainability Plan, including how the CAP meets or exceeds the Goals, Strategies, Targets, and Actions set forth in the Plan.

IV. The Draft PEIR and CAP Should Include Strategies to Substantially Reduce VMT.

As noted in our April 2020 Letter, the CAP and Draft PEIR should include robust strategies to significantly reduce vehicle miles travelled (“VMT”) within LA County region and consider measures proposed by CARB including within the Scoping Plan. Such strategies should include limiting new large-scale development in areas that generate disproportionately high levels of VMT, including areas far from existing job centers. Consistent with the policies in the Draft LA County Safety Element, the CAP and Draft PEIR should reiterate that new subdivisions in very high fire hazard severity zones are prohibited and inconsistent with the CAP or the LA County General Plan.

V. The Draft PEIR and CAP Should Include Robust Strategies to Achieve Zero Net Energy for All New Development.

As outlined in the April 2020 Letter, the CAP offers LA County an opportunity become a leader in setting standards on requiring zero net energy (“ZNE”) for new (and existing) development. The Draft PEIR and CAP should require zero net energy on all new commercial and residential construction. ZNE is feasible, as other projects in the County have recently been approved include a goal of zero net GHGs.¹ The Draft PEIR and CAP should include a ZNE Program that establishes clear standards for meeting ZNE for various sizes of commercial and residential development, and pair such standards with County programs to dramatically increase ZNE infrastructure including free or low-cost EV chargers throughout the county.

Consistent with statewide goals² on ZNE buildings, the Draft PEIR and CAP should include plans, incentives, and programs to retrofit at least 50 percent of commercial buildings to ZNE by 2030. This could include a crediting system to incentivize the retrofitting of existing commercial and residential developments with EV chargers and other ZNE infrastructure.

VI. The Draft PEIR and CAP Should Include Strategies to Increase Energy Resilience.

The Center supports the Draft CAP’s goal to shift to a renewables-based electricity supply which ensures equitable access to affordable, local, and reliable energy sources. However, the Draft PEIR and CAP should include far more ambitious strategies to increase energy resilience through the widespread adoption of renewable energy. While the April 2020 Letter cites studies demonstrating the feasibility of distributed energy resources, the even more recent results of National Renewable Energy Laboratory (“NREL”)’s Los Angeles 100% Renewable Energy Study (“LA100”)³ further demonstrate that achieving 100 percent reliable renewable energy is feasible in the near-term (e.g., by 2035).

¹ See California Department of Fish and Wildlife, *Newhall Ranch Resource and Development Management and Development Plan, Final Additional Environmental Analysis*, Appendix 2.1, available at http://planning.lacounty.gov/assets/upl/case/tr_53108_appendix-2-0-cdfw-final-aea-excerpts.pdf.

² California Public Utilities Commission, *Zero Net Energy*, available at <https://www.cpuc.ca.gov/ZNE/>.

³ The full report is available here: <https://maps.nrel.gov/la100/report>.

The Draft PEIR and CAP should also include a program or ordinance to fund and facilitate photovoltaic energy and storage, including through microgrid development, especially for unincorporated and fire-prone areas.

VII. Conclusion

Thank you for the opportunity to submit comments on the NOP. We look forward to reviewing the analysis and mitigation strategies in the Draft PEIR and CAP and proposing suggestions to refine and strengthen them. We also are happy to meet with County Planning staff to discuss any of the recommendations in this letter or the April 2020 Letter.

Sincerely,



J.P. Rose
Senior Attorney
Center for Biological Diversity
660 S. Figueroa Street, Suite 1000
Los Angeles, California, 90017
jrose@biologicaldiversity.org

Exhibit 1



April 30, 2020

Sent via email

Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, California 90012
climate@planning.lacounty.gov

Re: Comments on Public Review Draft of Los Angeles County Climate Action Plan

Dear Department of Regional Planning:

The Center for Biological Diversity (“Center”) submits the following comments on the Los Angeles County Climate Action Plan Public Review Draft (“Draft CAP”). While the Draft CAP includes some laudable goals, it suffers from a lack of clear and enforceable measures to ensure significant reductions in regional greenhouse gas (“GHG”) emissions. Many of our concerns were also reflected in our comments on the Draft Sustainability Plan, which is included as Attachment 1 and incorporated by reference.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over one million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County (“County”).

I. Climate Change Is an Urgent and Existential Concern.

Recent science has made clear that human-caused climate change is causing widespread harms to human society and natural systems, and climate change threats are becoming increasingly dangerous. In its 2018 *Special Report on Global Warming of 1.5°C*, the Intergovernmental Panel on Climate Change (“IPCC”)—the leading international scientific body for the assessment of climate change—describes the devastating harms that would occur at 2°C warming. The report highlights the necessity of limiting warming to 1.5°C to avoid catastrophic impacts to people and life on Earth (IPCC 2018). The report also provides overwhelming evidence that climate hazards are more urgent and more severe than previously thought, and that aggressive reductions in emissions within the next decade are essential to avoid the most devastating climate change harms.

The impacts of climate change are already being felt by humans and wildlife. Thousands of studies conducted by researchers around the world have documented changes in surface, atmospheric, and oceanic temperatures; melting glaciers; diminishing snow cover; shrinking sea ice; rising sea levels; ocean acidification; and increasing atmospheric water vapor (USGCRP 2017). In California, climate change will transform our climate, resulting in impacts including, but not limited to, increased temperatures and wildfires and a reduction in snowpack and precipitation levels and water availability.

II. The County Has a Responsibility to Reduce GHG Emissions.

California gives local authorities like the County significant responsibility over land use and planning decisions within their jurisdictions. But with that responsibility comes a corresponding obligation to account for the negative environmental impacts of those decisions—especially when it comes to controlling GHG emissions. As the California Air Resources Board (“CARB”) explains:

Local governments are essential partners in achieving California’s goals to reduce GHG emissions. Local governments can implement GHG emissions reduction strategies to address local conditions and issues and can effectively engage citizens at the local level. Local governments also have broad jurisdiction, and sometimes unique authorities, through their community-scale planning and permitting processes, discretionary actions, local codes and ordinances, outreach and education efforts, and municipal operations. Further, local jurisdictions can develop new and innovative approaches to reduce GHG emissions that can then be adopted elsewhere.

(CARB 2017.) California’s Scoping Plan, which lays out the statewide blueprint for meeting the legislature’s greenhouse gas reduction targets, also specifically calls out local governments as essential to meeting these targets:

[L]ocal governments and agencies are critical leaders in reducing emissions through actions that reduce demand for electricity, transportation fuels, and natural gas, and improved natural and working lands management. . . . Over the last 60 years, development patterns have led to sprawling suburban neighborhoods, a vast highway system, growth in automobile ownership, and under-prioritization of infrastructure for public transit and active transportation. Local decisions about these policies today can establish a more sustainable built environment for the future.

(CARB 2017.) Thus, the County must take seriously its obligation to do its utmost to ensure that it is reducing GHG emissions and contributing to the state’s achievement of its emissions reduction targets.

III. The Draft CAP Fails to Explain How It Will Meet State Goals.

While the Draft CAP acknowledges statewide climate goals (Draft CAP at 6-8 & 36), it does not explain how measures in the Draft CAP will actually meet these statewide climate goals. For instance, statewide targets require GHG emissions to be reduced to 1990 levels by 2020, 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050, and achieve statewide carbon neutrality by 2045. (Draft CAP at 17 & 36.)

In contrast, the Draft CAP includes a different set of goals: by 2025, reduce GHG emissions by 25 percent below 2015 levels; by 2035, reduce GHG emissions by 50 percent below 2015 levels; and by 2045, achieve carbon neutrality in unincorporated Los Angeles County. (Draft CAP at 8.) The Draft CAP fails to explain how these goals are either consistent or inconsistent with each of the statewide goals.

The Draft CAP therefore does not qualify as a CEQA “streamlining” document. CEQA Guidelines section 15183.5(b)(1)(D) require that a climate action plan demonstrate that it will achieve planned reductions on a project by project basis. In *Cleveland National Forest Foundation v. San Diego Association of Governments*, the California Supreme Court provided more clarity on what facts, data, and goals projects should analyze in their greenhouse gas analyses under CEQA. ((2017) 3 Cal.5th 497.) The Court found that although an “Executive Order ‘is not an adopted GHG reduction plan’ and that ‘there is no legal requirement to use it as a threshold of significance[,]’ ... [t]he Executive Order’s 2050 goal of reducing California’s greenhouse gas emissions to 80 percent below 1990 levels expresses the pace and magnitude of reduction efforts that the scientific community believes necessary to stabilize the climate. This scientific information has important value to policymakers and citizens in considering the emission impacts of a project like SANDAG’s regional transportation plan.” (*Id.* at 515-516.) Therefore, the Draft CAP should include further discussion on measures that could ensure the County meets statewide goals.

IV. The Draft CAP’s GHG Emissions Inventory Is Incomplete.

The Draft CAP lists five categories of GHG emissions in its GHG inventory: transportation, stationary energy, waste, industrial processes and product use (“IPPU”), and agriculture, forestry and, other land use (“AFOLU”). (Draft CAP at 30-32.) The CAP should set forth the emissions categories in more detail. A guide prepared by the Bay Area Air Quality Management District (“BAAQMD”) recommends, for example, listing the GHG emissions of specific items such as streetlights and traffic signals. (BAAQMD 2009.)

The Draft CAP also does not explain whether “transportation” emissions include emissions outside the County by activity within the County (for example, from exported goods or tourist travel to County from outside the County). This very shortcoming led to a judge invalidating Sonoma County’s CAP last year, after the judge determined that it failed to account for all of the County’s emissions by excluding transboundary emissions.¹ (Attachment 2.)

¹ The court also held that the CAP’s GHG reduction measures were not clearly defined or enforceable, which is also an issue with the Draft CAP here.

V. The Draft CAP's Reduction Strategies and Measures Are Non-Binding And Unenforceable.

The Draft CAP states that if future projects “tier” off of it, then compliance will negate the need for a qualitative analysis of future projects’ GHG emissions. (Draft CAP at 15.) The Draft CAP also correctly lays out the legal requirements of a climate action plan. (Draft CAP at 15.) For instance, a CAP must “Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level....” (Draft CAP at 15.) Therefore, the Final CAP, and any such plan prepared pursuant to CEQA Guidelines 15183.5, must meet the requirements for all first-tier environmental review documents and thus must impose enforceable requirements and measures with defined performance standards.²

Unfortunately, many of the Draft CAP’s reduction measures are largely non-binding and unenforceable, and generally lack performance standards. Notably, the words “encourage,” “promote,” “support” or “whenever feasible” occur many times in the sections describing the Draft CAP’s implementation measures. These measures are legally inadequate and cannot be considered mitigation under CEQA and applicable case law. (*Lincoln Place Tenants Assn. v. City of Los Angeles* (2007) 155 Cal.App.4th 425, 445 [“A ‘mitigation measure’ is a suggestion or change that would reduce or minimize significant adverse impacts on the environment caused by the project as proposed”]); *Preserve Wild Santee v. City of Santee* (2012) 210 CA 4th 260, 281 [mitigation measures that are so undefined that their effectiveness is impossible to determine are legally inadequate].) The California Attorney General has also expressly disapproved such an approach for measures upon which an agency relies:

Can a lead agency rely on policies and measures that simply “encourage” GHG efficiency and emissions reductions?

No. Mitigation measures must be “fully enforceable.” *Adequate mitigation does not, for example, merely “encourage” or “support” carpools and transit options, green building practices, and development in urban centers.* While a menu of hortatory GHG policies is positive, it does not count as adequate mitigation because there is no certainty that the policies will be implemented.

(CA Attorney General 2009.) The California Attorney General further states that programmatic plans to reduce GHG emissions pursuant to CEQA Guidelines section 15183.5 must “[i]dentify a set of specific, enforceable measures that, collectively, will achieve the emissions targets....” (CA Attorney General 2019.)

In *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, the Fourth District Court of Appeal criticized the County of San Diego for including measures in its CAP that were not backed up by a firm commitment by the County that they would be implemented. The Court noted that many of the measures in the CAP “are not currently funded,” such that the County of San Diego could not rely upon such unfunded programs to meet GHG reductions. (*Id.* at 1168-

² Specifically, CEQA Guidelines section 15183.5(b)(1)(D) states that measures should have “performance standards” which demonstrate they will achieve the planned reductions on a project by project basis.

1169.) The *Sierra Club* opinion also questioned whether people would actually participate in various programs outlined in the CAP, given that the record contained no evidence of such participation. (*Id.* at 1170.) Here, the Draft CAP suffers from similar defects – there is no evidence of funding for many of the various programs set forth in the Final CAP, nor evidence in the record that people or industry will actually participate in the voluntary programs described in the Draft CAP.

Accordingly, although the Draft CAP’s reduction measures may generally be worthwhile objectives for the County to pursue, the Draft CAP fails as a CEQA compliance tool because it relies upon non-enforceable measures. The Draft CAP also does not have adequate mechanisms to monitor progress towards achieving verifiable reduction targets.

VI. Strategy 2 Fails to Include Sufficient Measures to Support Transit Oriented Communities.

The Center generally supports the goals of Strategy 2 to support transit oriented communities. However, the targets are unclear, inadequate, and do not provide a path to actually achieve this goal. For instance, the 2025 target is to (1) “increase new housing built within 1/2 mile of high frequency transit to 50%” and (2) “reduce VMT per capita to 20 miles.” This target does not specify what the “50%” is a percent of – does this mean 50% of all new housing units in the County? This needs to be clarified in the Final CAP. In addition, it is unclear whether the County is intending to reduce VMT per capita to 20 miles *per day* or some other amount of time. More importantly, VMT per capita of 20 miles a day is still an extremely high number; the CAP should have more aggressive goals to reduce VMT per capita by 2025. As described in further detail in our comment letter on the Draft Sustainability Plan, significant reductions in VMT are required if the state is to meet its GHG reduction goals. (See Attachment 1 at p. 9-10.)

Unfortunately, the Actions supporting Strategy 2 provide no concrete requirements or criteria, or way to measure success. For instance, Action T1 states “Expand the number and extent of transit oriented communities, by encouraging development within High Quality Transit Areas, while ensuring vital public amenities such as parks and active transportation infrastructure are included.” (Draft CAP at 50.) Action T1 fails to contain a clear plan how such development will be “encouraged” such that it is little more than a hortatory statement. Likewise, Action T2 states “Develop community plans that will increase the percentage of residents who could live and work within the same community, and that could decrease the vehicle miles traveled.” (*Id.*) This action suffers from the same defects as Action T1. It also fails to specify any target increase in percentage of residents who live or work in the same community, or elements of such “community plans.”

VII. Strategy 3 Fails to Include Sufficient Measures to Reduce VMT.

Strategy 3 aims to reduce single occupancy vehicle (“SOV”) vehicle trips. However, the Draft CAP does not contain sufficiently aggressive goals. For instance, the Draft CAP only seeks 15 percent of trips to be non-SOV trips by 2025. (Draft CAP at 51.) As we noted in our comments on the Draft Sustainability Plan (Attachment 1), even if this target is met, in five years 85 percent of trips in the County will still be by car. The Draft CAP should call for much stronger measures to reduce SOV trips and VMT. The best way to do this is to limit development

in areas far from existing cities, as remote developments generate disproportionately high levels of VMT.

The actions within Strategy 3 are similarly inadequate. For instance, Action T5 states “develop a transportation technology strategy to proactively address how evolving tech-enabled mobility options can support public transit and advance OurCounty goals.” (Draft Plan at 51.) This is extremely vague and suffers from the defects outlined in Section V above. Similarly, Action T8 generally refers to “expand[ing] shade along and over pedestrian networks through zoning code revisions that encourage shade-providing building features,” but provides no enforceable requirements or metrics as to how much “shade expansion” will be required. (Draft CAP at 52.) Also illustrative of this problem is Action T11, which states, “Develop and implement a transportation demand management (TDM) ordinance that requires developers to incorporate measures such as subsidized transit passes and car share.” (Draft CAP at 53.) The time and opportunity to develop measures to require of developers for future projects is here in the CAP, if the County wishes to use the CAP as a CEQA streamlining document.

VIII. Strategy 4 Does Not Include A Clear Plan to Institutionalize Low-Carbon Transportation.

The Center supports Strategy 4 – institutionalize low-carbon transportation. (Draft CAP at 44.) However, the related “Targets” are woefully inadequate – the Draft Plan only seeks 500 EV and 200 ZEV charging stations at County-owned or public properties, and contains no targets for the remainder of the County (e.g., private businesses, residential developments). (Draft CAP at 55.) Likewise, the “Actions” provide no actual mandate for developers or landowners to incorporate charging stations into infrastructure.

If the County is serious about institutionalizing low carbon transportation, it needs to do far more than simply add a few hundred EV chargers at public venues. The CAP should instead include aggressive mandates for every new development (commercial and residential) to include an adequate number of EV chargers, as well as a crediting system in order to incentivize the retrofitting of existing commercial and residential developments with EV chargers.

The CAP should also require installation of charging stations at *all* County-owned properties and public venues, as well as in appropriate public right-of-ways.

And as with the other sections of the CAP, the “Actions” are vague, unenforceable, and do not include any performance criteria. For instance, Action T20 states: “Partner with a car or ride-sharing organization to provide access to EVs for low-income and disadvantaged community residents.” (Draft CAP at 57.) Action T20 does not provide any guidance as to what “partnering” means, nor does it provide any benchmark for success. How much expanded access to EVs will the County pursue via this measure? By failing to include any actual target or goal to measure success, the Draft CAP dooms this (and many other Actions) to failure.

IX. Strategy 5 Does Not Contain Clear Plan To Accelerate Freight Decarbonization.

The Center supports the goal to accelerate freight decarbonization. Unfortunately, once again, the Draft CAP’s Targets and Actions are not sufficient to meaningfully support this goal.

The Draft CAP does not even clear targets for medium-duty delivery trucks – it simply states that 25-50 percent of medium-duty delivery trucks should be electric or zero emission by 2025. (Draft CAP at 58.) This renders it unclear whether the goal is 25 percent or 50 percent. And the Draft CAP simply has no corresponding and more aggressive targets for 2035 and 2045.

Likewise, the Actions are untenably vague. By way of example, Action T25 states: “Implement freight decarbonization technologies along highway corridors passing through unincorporated communities ...” (Draft CAP at 59.) No specifics, enforceable mandates, or performance criteria are used to define this purportedly “Major Action.”

X. Strategy 6 Contains No Plan to Implement Zero Emissions Technologies for Off-road Vehicles and Equipment.

The Draft CAP should include concrete plans to implement and eventually require zero emissions technologies off-road vehicles and equipment. Instead, the Action items include non-binding language like: “Partner with SCAQMD and AVAQMD to *encourage* the use of zero-emission and near-zero-emission construction, agriculture, and manufacturing equipment.” (Draft CAP at 60, emphasis added.) The CAP can, and should, require zero emission or near-zero emission equipment by a specific date.

XI. Strategy 7 Does Not Provide A Plan To Decarbonize Building Energy Use.

The Center supports decarbonizing building energy use, but finds that the Draft CAP squanders an opportunity to establish the County as a leader in this area. The Final CAP should require zero net energy on all new commercial and residential construction. Zero net energy is feasible, as other projects in the County that have recently been approved include a goal of zero net greenhouse gas emissions.³

Indeed, the Draft CAP does not even contain goals that are consistent with state-wide goals. The California Energy Efficiency Strategic Plan provides:

All new residential construction will be zero net energy (ZNE) by 2020.
All new commercial construction will be ZNE by 2030
50% of commercial buildings will be retrofit to ZNE by 2030
50% of new major renovations of state buildings will be ZNE by 2025.⁴

In contrast, the Draft CAP only sets a target of 50 percent of all new buildings and major building renovations being “net zero carbon” by 2025 and 100 percent by 2045. (Draft CAP at 63.) The Draft Plan should contain far more aggressive goals that are consistent with climate science; the entire building sector should achieve zero emissions no later than later than 2045,

³ See California Department of Fish and Wildlife, *Newhall Ranch Resource and Development Management and Development Plan, Final Additional Environmental Analysis*, Appendix 2.1, available at http://planning.lacounty.gov/assets/upl/case/tr_53108_appendix-2-0-cdfw-final-aea-excerpts.pdf.

⁴ California Public Utilities Commission, *Zero Net Energy*, available at <https://www.cpuc.ca.gov/ZNE/>.

with interim enforceable benchmarks.⁵ Moreover, the Draft CAP also does not explain whether term “net zero carbon” is consistent with the state definition of zero net energy.

Strategy 7’s Actions fair no better. For instance, Action SE2 simply states “Establish carbon intensity limits for buildings over 20,000 square feet.” (Draft CAP at 64.) This contains no objection performance criteria – at best, it is a promise to develop performance criteria at some unspecified time in the future. As such, it fails as a CEQA mitigation measure. (See discussion in Section V above.)

Action SE4 also vaguely promises to “Adopt building code requirements for electric water and space heating and encourage alternatives to other natural gas uses in new and existing buildings.” (Draft CAP at 64.) The CAP needs to actually describe building code requirements or provide performance criteria. And “encouraging alternatives” is not a CEQA mitigation measure. Action SE7 likewise promises collaboration with the City of Los Angeles and Santa Monica to “develop building energy and emissions performance standards,” but provides no specifics on what those standards will entail, or what level of emissions reductions they would be expected or required to provide. (Draft CAP at 65.)

Action SE5 states “Adopt CALGreen Tier 1 green building standards and identify which Tier 2 standards could be adopted as code amendments.” (Draft CAP at 64.) However, significant portions of the California Green Building Standards are already mandatory. Such that it is unclear whether there is simply a restatement of existing law.⁶

Action SE6 is problematic for other reasons. This Action states, “Incentivize net zero energy residential and commercial buildings through streamlined development reviews.” (Draft CAP at 65.) First, as noted above, zero net energy should be *required*, not simply incentivized. Second, the Action does not explain what or how development review will be “streamlined.” While a CAP that complies with CEQA can streamline some aspects of development, development review should not be streamlined in a way that overlooks other non-climate impacts of a project, such as impacts on air quality, public health, wildlife, and traffic.

In contrast to the vague and unenforceable Actions in the Draft CAP, there are number of enforceable policies that can be used to reach achieve zero emissions by 2045 for all buildings. The Sierra Club’s *Building Electrification Action Plan for Climate Leaders* outlines various proposals, including a zero emission building code, local ordinances restricting gas and requiring all-electric new construction for all building types, GHG performance benchmarking, and air pollution standards for appliances. (See footnote 5.)

⁵ Rachel Golden, *Building Electrification Action Plan for Climate Leaders* <https://www.sierraclub.org/sites/www.sierraclub.org/files/Building%20Electrification%20Action%20Plan%20for%20Climate%20Leaders.pdf> (Dec. 2019).

⁶ See California Building Standards Commission, “California’s Green Building Code,” available at <https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen>.

XII. Strategy 9 Does Not Provide A Concrete Plan To Increase Energy Resilience.

The Center supports the Draft CAP’s goal to shift to a renewables-based electricity supply which ensures equitable access to affordable, local, and reliable energy sources. (Draft CAP at 69.) The Center urges the County to include more ambitious targets for distributed energy resources (“DER”). The Draft CAP calls for a 200 megawatt increase in DER capacity by 2025 and a 1 gigawatt increase by 2045. The Center urges the County to incorporate a target of 1 gigawatt in photovoltaic (“PV”) energy by 2025 and 4 gigawatts by 2045. The Draft CAP should include a target for 500 megawatts of distributed storage capacity by 2045 and 2 gigawatts by 2045.

DER plays a unique and vital role in creating a renewable energy future that not only promotes deeper renewable penetration, but also advances fundamental goals of equal access to clean energy, social justice, and biodiversity protection. With minimal water use, no emissions from generation, and minimal land use impacts, distributed solar is the most sustainable energy source currently in production.⁷ Further, building up distributed solar allows communities to gain local control over their energy system rather than leaving that control in the hands of investor-owned monopoly utilities. This shift empowers communities to make their own energy choices and gives them access to cheaper and cleaner energy, driving energy democracy. Progressive community solar policy can also enable renters and individuals who cannot afford to buy solar energy systems to invest in renewable energy, which in turn creates economic growth and local employment opportunities.

Studies show that far more ambitious targets for DER are currently feasible. A study by the National Renewable Energy Laboratory found that Los Angeles could support 9 gigawatts of rooftop solar, or 60 percent of its estimated total energy demand, using fairly conservative estimates.⁸ Another study by the Institute of the Environment and Sustainability at the University of California, Los Angeles (“UCLA”) found that rooftop solar can provide 7200 gigawatt hours of on-site building demands in a study area of 1.2 million parcels in L.A. County, which would meet approximately 29 percent of on-site building demands.⁹

The UCLA study found that remaining building demand that would be met by grid sources is approximately 18,000 gigawatt hours, and the potential solar output to export to the grid that is not used on-site is 16,400 gigawatt hours – this significant amount of additional electricity could be available for use by neighboring properties or elsewhere. The UCLA study also found that existing policies regulating grid operations limit potential rooftop solar output; in 20 percent of communities, current policies would reduce the technical potential of net solar generation by limiting the size of the arrays that can be installed. Moreover, the UCLA study found that lower-income and at-risk communities have greatest capacity for solar energy exports

⁷ Wiser, R. et al., “The environmental and public health benefits of achieving high penetrations of solar energy in the United States,” *Nature Energy* Vol. 113, pp. 472-486 (2016); Hernandez, R.R., Hoffacker, M.K. and C. Fields, “Efficient Use of Land to Meet Sustainable Energy Needs,” *Nature Climate Change*, Vol. 5: 353–358, (2015).

⁸ Pieter Gagnon, et al., *Rooftop Solar Photovoltaic Technical Potential in the United States: A Detailed Assessment* (Jan. 2016), available at <https://www.nrel.gov/docs/fy16osti/65298.pdf>.

⁹ Erik Porse, et al., *Net solar generation potential from urban rooftops in Los Angeles*, Energy Policy (July 2020).

to the grid. In short, the County should take a hard look at the actual solar capacity of the County based upon existing studies and include policies to meet or exceed the actual solar capacity.

The proposed Actions are also insufficient to address either the targets in the Draft CAP or the more aggressive targets proposed by the Center. Action SE14 proposes developing a community energy map that identifies opportunities for deploying distributed energy resources and microgrids in order to improve energy resiliency in disadvantaged communities. (Draft CAP at 69.) Instead of merely generating a map, the County should develop a program or ordinance to fund and facilitate PV and storage microgrid development, especially for unincorporated and fire-prone areas. The County could begin this program in fire-prone communities, and aim for a minimum of 10 percent PV and storage microgrids instead of simply 10 percent DER installation in fire-prone communities.

XIII. Strategy 10 Fails to Provide a Plan To Reach the Target Renewable Energy Goals.

The Center supports the general goal of Strategy 10 to increase renewable energy, but notes that much stronger targets should be incorporated into the Draft CAP. The Draft CAP calls for installation of solar on only 20 percent of commercial buildings over 50,000 square feet and at least 10 percent of single family residential buildings by 2025, and higher targets for 2035 and 2045.

The Draft CAP should set far more ambitious targets. It should require solar on 60 percent of commercial buildings of any size that are solar compatible and 50 percent of residential buildings by 2025, and 100 percent of all solar compatible buildings by 2030.

The Draft CAP also does not specify *how much* solar must be installed on buildings; by its own terms, a single small panel could be installed on a building, and that building could potentially count towards the goals. As with other sections of the Draft CAP, the Draft CAP does not explain or provide data (e.g., in appendices) how the anticipated GHG mitigation potential is supported by the target.

Once again, the proposed mitigation strategies or “Actions” fall far short of even meeting the Draft CAP’s existing targets. For instance, Action SE17 simply promises that the County will “encourage 100% renewable energy resource mix by 2025.” (Draft CAP at 72.) The severity and urgency of the climate crisis requires governments to do far more than simply “encourage” positive steps—the climate crisis (and state laws and policies) *requires* far more aggressive actions.

Moreover, the Draft CAP should strengthen the County’s role in supporting the community choice aggregation program. More specifically, the Draft CAP should include a no-cost subscription program for low-income families as well as tenants to participate. Such programs could be funded by creating a Community Energy Benefits Fund that would then be overseen by citizen task force or other non-governmental body—the Portland Clean Energy Fund illustrate of how such a program could function. Another example is East Bay Community Energy, which serves Alameda County.

XIV. The Draft CAP Fails to Contain Any Clear Plan To Support Strategy 16, Conserve Forests and Working Lands

The Center supports the conservation of forests and working lands. The Center also supports the targets to increase urban tree canopy. However, the Draft CAP fails to acknowledge how this plan fits into other related plans and programs. In particular, the City of Los Angeles is currently moving forward with a “Safe Sidewalks” initiative that will likely result in the destruction of many thousands of urban trees.¹⁰

Moreover, the Center supports Action A1 – supporting “the preservation of agricultural and working lands, including rangelands, and restore forest lands, by limiting the conversion of these lands to residential or other uses through tools such as the creation of agricultural easements, particularly within high climate-hazard areas and SEAs.” (Draft CAP at 87.) Yet, as outlined in our comments on the Draft Sustainability Plan, the County has a pattern and practice of *approving* large-scale development in rangelands and forest lands, particularly in high fire hazard areas. (See Attachment 1 at p. 4.) Action A1’s unenforceable promise to “limit” such conversion is unavailing and fails as a CEQA mitigation measure. (Draft CAP at 87.)

XV. The Draft CAP Fails to Identify Funding Sources for Mitigation Strategies.

As noted above, in *Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, the Court of Appeal determined that measures in a CAP were insufficient when they were not adequately funded. (*Id.* at 1168-1169.) Here, the various “actions” in the Draft CAP acknowledge that funding will be required (using icons ranging from a \$ to \$\$\$\$\$), but fail to include a specific estimate of how much funding may cost, or identify an available source of funding. Similarly, the handful of sentences in the Implementation Plans “identification of funding sources” provide no specificity nor commitment for funding any of the Draft CAP’s Actions. (See Draft CAP at 92.) This renders the Draft CAP inadequate as a CEQA streamlining document. Moreover, this omission calls into question whether any of the programs outlined in the Draft CAP will ever be implemented.

XVI. The Draft EIR Should Provide Further Detail on Mitigation Measures for Individual Projects.

The Center understands that the County will be preparing an EIR for the CAP. (See, e.g., Draft CAP at 15 [“With the adopted CAP, project-specific environmental documents that incorporate applicable CAP actions can “tier off” the environmental document adopted for the CAP to meet project-level CEQA evaluation requirements for GHG emissions.”].) In addition, CEQA Guidelines section 15183.5(b)(1)(F) requires that a climate action plan be adopted in a public process “after environmental review.” Subdivision (b)(2) provides that “[a] plan for the reduction of greenhouse gas emissions, once adopted following certification of an EIR or adoption of an environmental document, may be used in the cumulative impacts analysis of later project.”

¹⁰ Safe Sidewalks LA, Draft Environmental Impact Report, available at <https://sidewalks.lacity.org/environmental-impact-report>.

The Center hereby requests a minimum 90-day comment period for the Draft EIR in order to allow for adequate review by the public, particularly given the importance of the document for region-wide planning and the complexity of the issues. We hope that the Draft EIR and next draft of the CAP include and evaluate clear and enforceable measures to put the County on track to reach each of the statewide goals.

XVII. Conclusion

Thank you for the opportunity to submit comments on the Draft CAP. The Center strongly supports many of the goals of the Draft CAP. But these goals are not supported by clear, enforceable, and funded policies. The Center urges the County to significantly revise the CAP in order to address these deficiencies.

Please do not hesitate to contact us if you would like to meet to further discuss these issues.

Sincerely,



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Attachment 1



May 24, 2019

Sent via email and FedEx

Los Angeles County Chief Sustainability Office
Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012
sustainability@lacounty.gov

Re: Comments on Discussion Draft of Los Angeles Countywide Sustainability Plan

Dear Los Angeles County Chief Sustainability Office:

These comments are submitted on behalf of the Center for Biological Diversity (“Center”) regarding the Discussion Draft of the Los Angeles Countywide Sustainability Plan (“Draft Plan”). The Center appreciates the Chief Sustainability Office’s efforts in developing the Draft Plan and generally supports the goals of the Draft Plan. We urge the Chief Sustainability Office and the Los Angeles County Board of Supervisors (“Board”) to ensure that the strategies and policies supporting these goals are clear and enforceable.

A. Background on the Center for Biological Diversity.

The Center for Biological Diversity (“Center”) is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over one million members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in Los Angeles County.

B. The Center Urges Stronger Buffers to Ensure Healthy Community Environments.

We strongly support Goals 1 and 4—“resilient and healthy community environments where residents thrive in place” and opportunities for residents and businesses to “transition to clean economy sectors.” (Draft Plan at 20 & 72.) We also support strong efforts to decrease the public health problems generated by freeways and oil and gas drilling, but are concerned that the proposed targets and actions do not go far enough.

The Plan Should Require Larger Buffers between Sensitive Uses and Freeways

We support “siting of new sensitive uses, such as playgrounds, daycare centers, schools, residences, or medical facilities” farther from freeways, but are concerned that the proposed 500-foot buffers are insufficient. Studies indicate even people **900 to 1200 feet** from freeways experience health impacts and sensitive receptors such as children and the elderly suffer the most. (Lin 2002.) A review of 700 studies concluded that pollution causes asthma attacks in children, the onset of childhood asthma, impaired lung function, premature death and death from cardiovascular diseases, and cardiovascular morbidity. (Health Effects Institute 2010.) The Health Effects Institute study concluded that the “exposure zone” was 300 to 500 meters from the highways (984 feet to 1640 feet). (*Id.*) Other studies have reached similar conclusions. (Suglia 2008.) Living near expressways also increases the likelihood that residents will suffer from dementia. (Chen 2017.) The University of Southern California’s Environmental Health Centers have also collected data and studies showing risks and health impacts to pregnant women, babies, children, teenagers, adults, and seniors of living by a freeway.¹

The Plan Should Require 2500-foot Setbacks to Separate Oil and Gas Facilities from Homes

We would like to emphasize our support for the Draft Plan’s inclusion of a series of actions to address the disproportionate exposure of low-income communities of color to fossil fuel extraction and refining (Actions 2, 3, 4, 5 and 7). In addition, we support Action 78 that calls for collaborating with the City of Los Angeles to develop a sunset strategy for oil and gas operations that prioritizes disproportionately impacted neighborhoods. In the final adoption of the plan, we urge the County to incorporate a more specific, concrete and common sense measure that we have supported at the City and County as an ally of the STAND-LA coalition: a 2500-foot setback (or buffer zone) to separate oil and gas facilities from homes, schools and other sensitive land uses, with a plan to phase out existing oil and gas within no more than five years. We are also supportive of the Draft Plan’s inclusion of a commitment to a “Just Transition” that examines the impact of the transition to a cleaner economy and develops strategies for supporting displaced workers and connecting them with meaningful job training and employment opportunities (Actions 56 and 57).

¹ University of Southern California Environmental Health Centers, *References: Living Near Busy Roads or Traffic Pollution*, available at <http://envhealthcenters.usc.edu/infographics/infographic-living-near-busy-roads-or-traffic-pollution/references-living-near-busy-roads-or-traffic-pollution> (collecting studies). See also Tony Barboza and Jon Schleuss, “L.A. keeps building near freeways, even though living there makes people sick,” *Los Angeles Times* (Mar. 2, 2017), available at <http://www.latimes.com/projects/la-me-freeway-pollution/>.

Reducing Asthma and Toxic Emissions through Less VMT

The Center strongly supports decreasing child asthma rates as proposed by the Draft Plan. However, this will not be possible if the Board continues to approve projects that add more unnecessary freeway traffic and air pollution to the region. An example of this is the recently-approved Centennial development approved by the Board, which will add 75,000 new long distance car commuters onto our freeways, increasing air pollution and hindering efforts to reduce toxic emissions.

C. The Center Supports Goal 2 and Urges Implementation of Zero Net Energy Standards.

We support the Plan’s Goal 2—ensuring that “[b]uildings and infrastructure that support human health and resilience.” (Draft Plan at 42.) The Center notes that Action Item 30 envisions the County will “Pilot high performance building standards for new County buildings beyond the current LEED Gold standard, such as Passive House, Zero Net Energy, Net Zero Water, Net Zero Waste...” (Draft Plan at 50.) The Center urges the Plan to require more than just a “pilot” for Zero Net Energy and instead move forward with policies and standards to require zero net energy for new construction.

Zero net energy is feasible, as other projects in the County that have recently been approved include a goal of zero net greenhouse gas emissions. Such projects intend to achieve that goal through reducing onsite greenhouse gas emissions to the greatest extent practicable, but also by offsetting any other emissions through local emissions reductions projects.²

D. The Center Supports Goal 3 and Urges Concrete and Enforceable Policies to Limit Sprawl Development.

The Center strongly supports the Draft Plan’s goal of equitable and sustainable land use and development without displacement. (Draft Plan at 58.) The Center agrees that the way the County “choose[s] to direct that growth has huge implications for the environment, the economy and social equity.” (*Id.*) Likewise, the Center agrees:

Patterns of exurban sprawl and development in high-hazard areas can place major burdens on our infrastructure and public budgets, especially for unincorporated communities where the County of Los Angeles acts as the municipal service provider. Outward growth limits the resources we could otherwise be investing in our existing communities, where we can promote sustainability, health and well-being by improving walkability and promoting a mixture of uses.

(Draft Plan at 58.) The Draft Plan is correct that exurban sprawl imposes a hidden tax on existing communities. Studies recognize that sprawl “may deprive the poor of economic

² See California Department of Fish and Wildlife, *Newhall Ranch Resource and Development Management and Development Plan, Final Additional Environmental Analysis*, Appendix 2.1, available at http://planning.lacounty.gov/assets/upl/case/tr_53108_appendix-2-0-cdfw-final-aea-excerpts.pdf.

opportunity...when jobs, stores, good schools and other resources migrate outward from the core city, poverty is concentrated in the neighborhoods that are left behind.” (Frumkin 2002.) Studies also show that sprawl disproportionately increases costs on local government through increased infrastructure costs. (Litman 2015.) One study found that the external costs of sprawl are around \$500 billion annually and \$650 billion internally. (*Id.*) Sprawl also has significant equity implications—“the abandonment of the metropolitan core leaves inner cities and first-ring suburbs struggling to provide adequate services with an eroded tax base even as growth continues on the periphery.” (Belzer 2002.)

The Draft Plan is also correct that “[u]rban sprawl generally requires expensive and expansive infrastructure networks that drain resources and contribute significantly to greenhouse gas emissions.” (Draft Plan at 60.)

Unfortunately, with the exception of Supervisor Kuehl, the Board has not shown they are serious about curbing urban sprawl. County supervisors just approved one of the biggest urban sprawl projects in California history last month, the 12,000-acre Centennial Specific Plan, on remote wildlands in the northern corner of the County. The Center informed the County that Centennial would result in less investment in existing communities and—as observed by the developer’s own consultants—draw demand away from existing communities in Santa Clarita and San Fernando. The development would also require the construction of a new six-lane freeway (the Northwest 138 Corridor “Improvement Project”), at an initial cost to taxpayers of \$830 million.

The Board also just approved the 1,300-acre Northlake development over the objection of the Santa Monica Mountains Conservancy (and the Center). That project will pave over pristine wildlands, inhibit wildlife connectivity in the region, and disproportionately contribute to greenhouse gas emissions, traffic, and air pollution.

If the County is serious about ending its historical pattern of approving more development in the county’s diminishing wildlands and rangelands, then it needs to adopt strong enforceable policies to meet this goal. Action 44 is a step in the right direction. The Draft Plan states, “Prohibit the conversion of working lands to residential uses, including farms and rangelands.” (Draft Plan at 60.) Such a policy—if it were actually consistently enforced—would be a strong step forward in protecting the County’s natural resources.

E. The Center Supports the Draft Plan’s Target to Limit Discretionary Development in High Fire Areas.

We support Strategy 3E—limiting development in high fire areas. The science is clear that we can no longer continue building new large-scale development in high fire areas. In Southern California, sprawl developments with low/intermediate densities extending into chaparral and sage scrub habitats that are prone to fire have led to more frequent wildfires caused by human ignitions, like arson, improperly disposed cigarette butts, debris burning, fireworks, campfires, or sparks from cars or equipment (Keeley et al. 1999; Keeley and Fotheringham 2003; Syphard et al. 2007; Syphard et al. 2012; Bistinas et al. 2013; Balch et al. 2017; Radeloff et al. 2018). Human-caused fires account for 95% of all fires in Southern California (Syphard et al.

2013), and homes filled with petroleum-based products, such as wood interiors, paint, and furniture, provide additional fuel for the fires to burn longer and spread farther (Keeley et al. 2007). The most numerous and largest fires in Southern California have been caused by equipment and powerlines in the wildland-urban interface, where housing density is low to intermediate (Syphard and Keeley 2015), and leapfrog developments have been found to have the highest predicted fire risk in the County (Syphard et al. 2013).

More development in high fire areas such as chaparral and sage scrub would lead to a dangerous feedback loop of deadly fires and habitat destruction. These habitats are adapted to infrequent (every 30 to 150 years), large, high-intensity crown fire regimes (Pyne et al. 1996; Keeley and Fotheringham 2001), and if these regimes are disrupted, the habitats become degraded (Keeley 2005, 2006a,b; Syphard et al. 2018). When fires occur too frequently, type conversion occurs and the native shrublands are replaced by non-native grasses and forbs that burn more frequently and more easily, ultimately eliminating native habitats and biodiversity while increasing fire threat over time (Keeley 2005, 2006a,b; Syphard et al. 2009; Safford and Van de Water 2014; Syphard et al. 2018). Thus, placing developments in these high fire-prone areas will lead to more frequent fires while degrading the health and biodiversity of Southern California's ecosystems.

Nonetheless, the "actions" in the Draft Plan do not set forth a clear plan to actually limit development in high fire areas. In particular, while the Countywide "Target" states "no new discretionary development in high hazard areas" by 2025, there is no "action" proposed to meet this target. (Draft Plan at 70.) Instead, as mentioned above, the County has been approving large-scale development such as Centennial and Northlake in high fire areas. By approving entitlements for these projects now despite the science showing such development is dangerous, costly, and environmentally harmful, the County is ensuring large-scale development will continue in fire-prone areas for many years.

F. The Center Strongly Supports Goal 5 and Urges The County To Develop a Wildlife Connectivity Ordinance

The Center strongly supports the Draft Plan's goal of thriving ecosystems, habitats, and biodiversity. (Draft Plan at 78.) To realize this goal, the Plan must consider the issue of wildlife connectivity and the effects of suburban development on wild areas, as explained below.

Habitat Connectivity Is Essential for Wildlife Movement and Biodiversity Conservation.

Habitat connectivity is vital for wildlife movement and biodiversity conservation. Limiting movement and dispersal with barriers (*e.g.*, development, roads, or fenced-off croplands) can affect animals' behavior, movement patterns, reproductive success, and physiological state, which can lead to significant impacts on individual wildlife, populations, communities, and landscapes (Trombulak and Frissell 2000; Tewksbury et al. 2002; Cushman 2006; van der Ree et al. 2011; Haddad et al. 2015; Ceia-Hasse et al. 2018). Individuals can die off, populations can become isolated, sensitive species can become locally extinct, and important ecological processes like plant pollination and nutrient cycling can be lost. In addition, connectivity between high quality habitat areas in heterogeneous landscapes is important to

allow for range shifts and species migrations as climate changes (Heller and Zavaleta 2009, Cushman et al. 2013). Lack of wildlife connectivity results in decreased biodiversity and degraded ecosystems. Thus, preserving and maintaining natural and created corridors is critical for species and habitat conservation in fragmented landscapes (Gilbert-Norton et al., 2010).

Wildlife connectivity and migration corridors are important at the local, regional, and continental scale. Local connectivity that links aquatic and terrestrial habitats would allow various sensitive species to persist, including state- and federally-protected California red-legged frogs (*Rana draytonii*), arroyo toads (*Anaxyrus californicus*), and other species. At a regional scale, medium- and large-sized mammals that occur in Los Angeles County, such as mountain lions (*Puma concolor*), bobcats (*Lynx rufus*), gray foxes (*Urocyon cinereoargenteus*), ring-tailed cats (*Bassariscus astutus*), and mule deer (*Odocoileus hemionus*), require large patches of heterogeneous habitat to forage, seek shelter/refuge, and find mates.

Climate Change Is Likely to Significantly Alter Wildlife Behavior and Movement.

A strong, international scientific consensus has established that human-caused climate change is causing widespread harms to human society and natural systems, and climate change threats are becoming increasingly dangerous. In a 2018 *Special Report on Global Warming of 1.5°C* from the Intergovernmental Panel on Climate Change (IPCC), the leading international scientific body for the assessment of climate change describes the devastating harms that would occur at 2°C warming, highlighting the necessity of limiting warming to 1.5°C to avoid catastrophic impacts to people and life on Earth (IPCC 2018). In addition to warming, many other aspects of global climate are changing. Thousands of studies conducted by researchers around the world have documented changes in surface, atmospheric, and oceanic temperatures; melting glaciers; diminishing snow cover; shrinking sea ice; rising sea levels; ocean acidification; and increasing atmospheric water vapor (USGCRP, 2017).

Climate change is increasing stress on species and ecosystems, causing changes in distribution, phenology, physiology, vital rates, genetics, ecosystem structure and processes, and increasing species extinction risk (Warren et al., 2011). A 2016 analysis found that climate-related local extinctions are already widespread and have occurred in hundreds of species, including almost half of the 976 species surveyed (Wiens 2016). A separate study estimated that nearly half of terrestrial non-flying threatened mammals and nearly one-quarter of threatened birds may have already been negatively impacted by climate change in at least part of their distribution (Pacifici et al. 2017). A 2016 meta-analysis reported that climate change is already impacting 82 percent of key ecological processes that form the foundation of healthy ecosystems and on which humans depend for basic needs (Scheffers et al. 2016). Genes are changing, species' physiology and physical features such as body size are changing, species are moving to try to keep pace with suitable climate space, species are shifting their timing of breeding and migration, and entire ecosystems are under stress (Cahill et al., 2012; Chen et al., 2011; Maclean & Wilson, 2011; Parmesan, 2006; Parmesan & Yohe, 2003; Root et al., 2003; Warren et al., 2011). As such, it is imperative that current and future land use planning consider the impacts of climate change on wildlife movement.

Corridor Redundancy Helps Retain Functional Connectivity and Resilience.

Corridor redundancy (*i.e.* the availability of alternative pathways for movement) is important in regional connectivity plans because it allows for improved functional connectivity and resilience. Compared to a single pathway, multiple connections between habitat patches increase the probability of movement across landscapes by a wider variety of species, and they provide more habitat for low-mobility species while still allowing for their dispersal (Mcrae et al., 2012; Olson & Burnett, 2013; Pinto & Keitt, 2008). In addition, corridor redundancy provides resilience to uncertainty, impacts of climate change, and extreme events, like flooding or wildfires, by providing alternate escape routes or refugia for animals seeking safety (Cushman et al., 2013; Mcrae et al., 2008; Mcrae et al., 2012; Olson & Burnett, 2013; Pinto & Keitt, 2008).

Human Development and Associated Noise and Lighting Can Interfere with the Behavior of Local Wildlife Such as Mountain Lions.

Human development and associated noise can degrade adjacent wildlife habitat and behavior. (*See, e.g.,* Slabbekoorn 2008.) For instance, field observations and controlled laboratory experiments have shown that traffic noise can significantly degrade habitat value for migrating songbirds. (Ware et al. 2015.) This finding followed lab results indicating that subjects exposed to 55 and 61 dBA simulated traffic noise exhibited decreased feeding behavior and duration, as well as increased vigilance behavior. (*Id.*) Such behavioral shifts increase the risk of starvation, thus decreasing survival rates. A recent study also highlighted the detrimental impacts of siting development near areas protected for wildlife. The study noted that “Anthropogenic noise 3 and 10 dB above natural sound levels . . . has documented effects on wildlife species richness, abundance, reproductive success, behavior, and physiology.” (Buxton, et al.) The study further noted that “there is evidence of impacts across a wide range of species [] regardless of hearing sensitivity, including direct effects on invertebrates that lack ears and indirect effects on plants and entire ecological communities (e.g., reduced seedling recruitment due to altered behavior of seed distributors).” (*Ibid.*) Moreover, human transportation networks and development resulted in high noise exceedances in protected areas. (*Ibid.*)

There also is strong evidence documenting the effects of human activity specifically on mountain lions. One study found that mountain lions are so fearful of humans and noise generated by humans that they will abandon the carcass of a deer and forgo the feeding opportunity just to avoid humans. (Smith 2017.)³ The study concluded that even “non-consumptive forms of human disturbance may alter the ecological role of large carnivores by affecting the link between these top predators and their prey.” (Smith 2017.) In addition, the study found that mountain lions respond fearfully upon hearing human vocalizations. Another study demonstrates that mountain lions exposed to other evidence of human presence (lighting, vehicles, dogs) will impact mountain lion behavior. (Wilmers 2013.) Other studies documented diet shifts in mountain lions near human development, and recommended minimizing any development in mountain lion habitat. (Smith 2016; *see also* Smith 2015.)

³ *See also* Sean Greene, “How a fear of humans affects the lives of California's mountain lions,” *Los Angeles Times* (June 27, 2017), available at <http://beta.latimes.com/science/sciencenow/la-sci-sn-pumas-human-noise-20170627-story.html>.

Additional studies similarly documented that mountain lions avoid “urban, agricultural areas, and roads and prefer[] riparian areas and more rugged terrain.” (Zeller 2017; *see also* Vickers 2015.) One study found that over half (55 percent) of radio collared mountain lions in urban areas did not survive, and the majority were killed by humans either by vehicle strikes or using depredation permits. (Vickers 2015.) As such, the Plan should include policies to minimize development in open space areas, as “edge effects” from such development can interfere with animal behavior and movement.

Creating and Enhancing Wildlife Crossings Is Critical to Maintaining Healthy Ecosystems.

We recommend that the Draft Plan include stronger policies to promote wildlife movement and/or include a goal to develop a county wildlife connectivity ordinance. Enhanced connectivity helps sustain functional ecosystems and ensure public safety. Although natural, existing corridors in fragmented landscapes have been shown to have more wildlife movement compared to created corridors (Gilbert-Norton et al., 2010), crossing structures combined with setbacks at the entrances and exits are useful as retroactive restoration in areas where existing roads have high incidence of wildlife vehicle conflict or where species movement has been severely impacted. When appropriately implemented, wildlife crossing infrastructure has been shown to improve wildlife permeability and reduce wildlife vehicle collisions (Bissonette & Rosa, 2012; Dodd Jr. et al., 2004; Dodd et al., 2012; Kintsch et al., 2018; Sawaya et al., 2014; Sawyer et al., 2012).

Outside of California many other states and jurisdictions have been proactively addressing wildlife connectivity issues. For example, Arizona, Colorado, and Wyoming have seen 80-96% reductions in wildlife vehicle collisions while gradually increasing the level of wildlife permeability over time (it appears that some species take more time than others to adapt to crossings) on sections of highways where they have implemented wildlife crossing infrastructure, such as underpasses, culverts, overpasses, wildlife fencing, and escape ramps (Dodd et al., 2012; Kintsch et al., 2017; Kintsch et al., 2018; Sawyer et al., 2012). Utah just completed the state’s largest wildlife overpass at Parleys Canyon for moose, elk, and deer. Washington State is about to complete its largest wildlife overpass on I-90, which is anticipated to provide habitat connectivity for a wide variety of species between the North and South Cascade Mountains. The overpass cost \$6.2 million as part of a larger \$900 million expansion project that will include multiple wildlife crossings along a 15-mile stretch of highway. Savings from less hospital bills, damage costs, and road closures from fewer wildlife vehicle collisions will make up those costs in a few years (Valdes 2018). State and local officials are actively pursuing these types of projects because of the benefits for wildlife connectivity, public safety, and the economy. And in neighboring Ventura County, the Board of Supervisors recently adopted a first-of-its-kind ordinance to protect wildlife connectivity.

The Draft Plan Should Provide Clear Action Items To Support Wildlife Connectivity

We are concerned that the action items proposed in the Draft Plan are insufficient to support Goal 5. In particular, lacking from the action items is any clear plan for ensuring habitat connectivity within the region.

Instead, it appears that the County has not prioritized this issue. For instance, the County General Plan EIR anticipated a significant adverse effect on wildlife movement.⁴ The California Department of Fish and Wildlife (“CDFW”) urged the County to develop mitigation opportunities for wildlife connectivity, since such “opportunities for wildlife corridors and nursery sites are best established during large scale planning efforts such as this General Plan.” CDFW noted that “Wildlife corridor areas can be delineated and set aside in the General Plan for current and future conservation efforts. An assessment could be placed on development within the Project area to secure the acquisition of these critical linkages and sites, therefore reducing impacts to wildlife corridors and nursery sites and ensuring biological diversity.”⁵ The County did not implement CDFW’s recommendations.

The Plan should include a goal to develop a wildlife connectivity ordinance. Moreover, while the proposed “actions” to support Goal 5 are all helpful measures, more is needed. The Plan should incorporate policies that support an “urban growth boundary.” Urban growth boundaries have been used in other jurisdictions as a tool to encourage development in or near existing communities while leaving natural areas undeveloped. Without a clearly defined urban growth boundary, developers will continue to propose—and the Board will continue to approve—development in wild and fire-prone areas, which will further inhibit wildlife connectivity while increasing traffic and air pollution.

G. The Center Supports Goals 7 and 8 and Encourages Stronger Policies To Reduce VMT.

We support Goals 7 and Goal 8—a fossil fuel-free LA County with convenient, safe and affordable transportation that reduces car dependency. However, the targets and associated actions do not include sufficiently ambitious goals to reduce vehicle miles travelled (“VMT”). The Draft Plan’s aims for “[a]t least 15% of all trips will be by foot, bike, micromobility, or public transit.” (Draft Plan at 108.) This means that even if this target is met, in six years 85 percent of trips in the County will still be by car. The Draft Plan should call for much stronger measures to reduce single occupancy vehicle trips and VMT. The best way to do this is to limit development in areas far from existing cities that generate high VMT and limit new freeway development, which induces additional VMT.

The December 2018 Technical Advisory issued by the Governor’s Office of Planning and Research (the “VMT Report”)⁶ contains helpful guidance and analysis that could be

⁴ County of Los Angeles, *Los Angeles County General Plan Update Draft Environmental Impact Report* (June 2014), available at http://planning.lacounty.gov/assets/upl/project/gp_2035_deir.pdf.

⁵ County of Los Angeles, *Los Angeles County General Plan Update Final Environmental Impact Report* (March 2015), available at http://planning.lacounty.gov/assets/upl/project/gp_2035_lac-gpu-final-eir-final.pdf.

⁶ The VMT Report is available at http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

incorporated into the Draft Plan. For instance, the VMT Report states that land use decisions to reduce GHG emissions associated with the transportation sector are crucial in order to meet the GHG reductions set forth in SB 375. (VMT Report at 3.) The VMT Report further notes that California cannot meet its climate goals without curbing single-occupancy vehicle activity; land use patterns and transportation options will need to change to support reductions in VMT. (*Id.* at 10.) The VMT Report also proposes a “per capita” or “per employee” threshold of 15 percent below existing development as a reasonable threshold. (*Id.* at 10.) The VMT Report reiterates the conclusion of the California Air Resources Board that “there is a gap between what SB 375 can provide and what is needed to meet the State’s 2030 and 2050 goals.” (*Id.*)

The VMT Report confirms that VMT-intensive development impacts human health and the environment: “Human health is impacted as increases in vehicle travel lead to more vehicle crashes, poorer air quality, increases in chronic diseases associated with reduced physical activity, and worse mental health. Increases in vehicle travel also negatively affect other road users, including pedestrians, cyclists, other motorists, and many transit users. The natural environment is impacted as higher VMT leads to more collisions with wildlife and fragments habitat. Additionally, development that leads to more vehicle travel also tends to consume more energy, water, and open space (including farmland and sensitive habitat). This increase in impermeable surfaces raises the flood risk and pollutant transport into waterways.” (VMT Report at 3.) As such, if the County took strong steps to reduce VMT, it would have co-benefits of better air quality, decreased chronic disease, decreased wildlife-vehicle collisions, and less habitat fragmentation.

The VMT Report further states that roadway expansion projects can induce substantial VMT such that the environmental reviews should incorporate quantitative estimates of induced VMT. (VMT Report at 23.) The VMT Report explains that “[b]uilding new roadways, adding roadway capacity in congested areas, or adding roadway capacity to areas where congestion is expected in the future, typically induces additional vehicle travel.” (*Id.* at 24.) The Plan should thus contain policies to discourage unnecessary highway development and instead focus infrastructure resources on alternative transportation projects.

H. Conclusion

Thank you for the opportunity to submit comments on the Draft Plan. Again, the Center strongly supports the goals of the Draft Plan. But if the goals in the plan are not supported by clear and enforceable policies, then the final Plan will be ineffective in achieving these goals.

Los Angeles County’s traffic jams, air pollution, fragmented wildlife habitat, and diminishing wildlands are a legacy of poor planning decisions made by local officials, often made under pressure from profit-driven developers. Unfortunately Los Angeles County and its Board have continued to approve costly, dangerous, and environmentally-damaging development despite (1) strong public opposition and (2) science confirming that such development is inappropriate in light of the climate crisis, extinction crisis, and the risks of building in fire-prone landscapes.

The Center urges the Chief Sustainability Office and Board to use this Plan as a means to establish a new vision for Los Angeles County that supports healthy communities and healthy wildlands. For such a vision to become reality, it must be supported by clear, binding, and legally enforceable policies. As long as such policies are vague or absent, developers will continue proposing—and officials will likely keep approving—projects that take the county in the wrong direction.

Please do not hesitate to contact the Center at the number or email listed below.

Sincerely,

A handwritten signature in blue ink, appearing to read 'J.P. Rose', with a stylized flourish at the end.

J.P. Rose
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Los Angeles, California, 90017
jrose@biologicaldiversity.org

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(Attached on CD)

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Attachment 2

1 Hon. Nancy Case Shaffer
2 Superior Court for the County of Sonoma
3 3035 Cleveland Avenue, Suite 200
4 Santa Rosa, CA 95403
5 Telephone: (707) 521-6729

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SONOMA

JUL 20 2017

BY M. Conley
Deputy Clerk

8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9 COUNTY OF SONOMA

11 CALIFORNIA RIVERWATCH,
12 Petitioner,
13 v.
14 COUNTY OF SONOMA, ET AL.
15 Defendants.
16

Case No.: SCV-259242

ORDER GRANTING PETITION
FOR WRIT OF MANDATE

18 This matter was tried to the court on March 23, 2017, the Honorable Nancy Case
19 Shaffer presiding. The Law Office of Jack Silver and Jerry Bernhaut and Jack Silver
20 appeared on behalf of Petitioner; the Office of Sonoma County Counsel and Bruce Goldstein
21 and Verne Ball appeared on behalf of Respondent Sonoma County Regional Climate
22 Protection Authority. At the conclusion of the hearing, the court ordered further briefing.
23 The matter was deemed submitted on April 21, 2017, when all briefs were submitted.

24 I. SUMMARY OF RULING

25 The court finds that the Sonoma County Regional Climate Protection Authority's Final
26 Programmatic EIR ("the PEIR") for Climate Action 2020 and Beyond, its Climate Action
27 plan ("CAP") and the County of Sonoma's approval of the CAP violate CEQA, in that the
28 inventory of greenhouse gas emissions is based on insufficient information; the PEIR fails to

1 include effectively enforceable, clearly defined performance standards for the mitigation
2 measures regarding Green House Gas ("GHG") emissions, identified as "GHG Reduction
3 Measures;" and fails to develop and fully analyze a reasonable range of alternatives.

4 Accordingly, the approval of the PEIR was a prejudicial abuse of discretion by
5 Respondent. Given the lack of information and other material defects, as a matter of law the
6 PEIR cannot fulfill its basic CEQA purpose as an information document.

7 The court finds that there is insufficient information in the administrative record to
8 support the factual conclusion that the CAP will achieve its fundamental purpose of reducing
9 Respondent's countywide GHG emissions to the stated target of 25% below 1990 levels by
10 2020.

11 I. FACTS

12 Petitioner seeks a writ of mandate overturning Respondent's certification and of a
13 Final Programmatic EIR (the PEIR) for its Climate Action Aplan (CAP) and the approval of
14 the CAP on the grounds that the approvals violate CEQA.

15 A. The Project

16 The CAP Project is a planning-level document to guide analysis of the greenhouse gas
17 (GHG) impacts of future projects in the county.

18 In 2006, the California legislature passed AB 32, the Global Warming Solutions Act
19 (the Act) which, among other things, establishes a statewide goal of achieving 1990-level
20 GHG impacts by 2020.

21 CEQA Guideline 15183.5 allows agencies to adopt an overall long-range plan such as
22 a general plan or similar plan governing GHG analysis of subsequent projects. Respondent
23 adopted the CAP in accord with Guideline 15183.5 as a method of providing an overall *tiered*
24 *analysis* of GHG impacts in subsequent projects as a method of complying with the Act's
25 mandate. (1 AR 4, 10.)
26
27
28

1 of the California Supreme Court, “the heart of CEQA.” *Laurel Heights Improvement Assn. v.*
2 *Regents of the University of California* (1988) 47 Cal.3d 376, 392 (*Laurel Heights I*).

3 The ultimate mandate of CEQA is “to provide public agencies and the public in
4 general with *detailed information* about the effect [of] a proposed project” and to minimize
5 those effects and choose possible alternatives. (emphasis added) (PRC 21061.) The public
6 and public participation hold a “privileged position” in the CEQA process based on
7 fundamental “notions of democratic decision-making.” (*Concerned Citizens of Costa Mesa,*
8 *Inc. v. 32nd District Agricultural Association* (1986) 42 Cal.3d 929, 936.)

9 As a fundamental benchmark that generally applies to all issues in CEQA the court, is
10 that the court, in considering an issue, should look to see if “the public could discern... the
11 ‘analytic route the... agency traveled from evidence to action.’” (See *Al Larson Boat Shop*
12 *Inc. v. Bd. of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 749; see also *Topanga Assn.*
13 *for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 513-514, 522.)

14 The burden of investigation rests with the government and not the public. (*Lighthouse*
15 *Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1202.)

16 **C. Standard of review**

17 **1. Preliminary Basis for Standard of Review**

18 The standard of review is in dispute here. This dispute arises out of the divergent
19 characterizations of the issues by the parties.

20 Public Resources Code section 21168 provides that when a court reviews a
21 determination, finding, or decision of a public agency, "as a result of a proceeding in which
22 by law a hearing is required to be given, evidence is required to be taken and discretion in the
23 determination of facts is vested in a public agency ... the court shall not exercise its
24 independent judgment on the evidence but shall only determine whether the act or decision is
25 supported by substantial evidence in the light of the whole record." However, review is *de*
26 *novo* when the court must determine whether the agency has prejudicially abused its
27 discretion either by failing to proceed in the manner required by law or by reaching a decision
28 that is not supported by substantial evidence. (*Laurel Heights I, supra* 47 Cal.3d 392, fn.5.)

1 “[A] reviewing court must adjust its scrutiny to the nature of the alleged defect, depending on
2 whether the claim is predominantly one of improper procedure or a dispute over the facts.”
3 *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40
4 Cal.4th 412, 435 (“*Vineyard*”).

5 As the court explained in *Vineyard*:

6 [A]n agency may abuse its discretion under CEQA either by failing to proceed in the
7 manner CEQA provides or by reaching factual conclusions unsupported by substantial
8 evidence. (§21168.5.) Judicial review of these two types of error differs significantly:
9 while we determine de novo whether the agency has employed the correct procedures,
10 “scrupulously enforc[ing] all legislatively mandated CEQA requirements” (*Citizens of*
11 *Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564...), we accord greater
12 deference to the agency's substantive factual conclusions. In reviewing for substantial
13 evidence, the reviewing court “may not set aside an agency's approval of an EIR on
14 the ground that an opposite conclusion would have been equally or more reasonable,”
15 for, on factual questions, our task “is not to weigh conflicting evidence and determine
16 who has the better argument.”(*Laurel Heights I, supra*, 47 Cal.3d at p. 393....)²

17 While courts must give deference as to substantive factual decisions, courts demand
18 strict compliance with “legislatively mandated CEQA requirements.” (*Citizens of Goleta*
19 *Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564 (*Goleta II*)). A Respondent is entitled
20 to no deference where the law has been misapplied, or where the decision was based on “an
21 erroneous legal standard.” (*East Peninsula Educ. Council, Inc. v. East Peninsula Unif. Sch.*
22 *Dist.* (1989) 210 Cal.App.3d 155, 165.)

23 Courts must ‘determine de novo whether the agency has employed the correct
24 procedures, “scrupulously enforc[ing] all legislatively mandated CEQA requirements”....’
25 (*Vineyard Area Citizens for Responsible Growth, supra*, 40 Cal.4th 435, citing *Goleta II*, 52
26 Cal.3d at 564.) *Failure to include required information is a failure to proceed in the manner*
27

28

² *Laurel Heights I* is *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 400 (*Laurel Heights I*

1 required by law and demands strict scrutiny. (*Sierra Club v. State Bd. of Forestry* (1994) 7
2 Cal.4th 1215, 1236; *Vineyard, supra*, 40 Cal.4th at 435.) The court reviews the PEIR here de
3 novo.

4 Nevertheless, agency actions are presumed to comply with applicable law unless the
5 petitioner presents proof to the contrary. (Evid. Code § 664; *Foster v. Civil Service*
6 *Commission of Los Angeles County* (1983) 142 Cal.App.3d 444, 453.) The petitioner in a
7 CEQA action thus has the burden of proving that an EIR is insufficient. (*Al Larson Boat*
8 *Shop, Inc. v. Board of Harbor Commissioners* (1993) 18 Cal.App.4th 729, 740.)

9 **2. Standard of Review: Substantial-Evidence Test**

10 The substantial-evidence test applies to substantive issues in a decision certifying an
11 EIR. The court must uphold the decision if it is supported by substantial evidence in the
12 record as a whole. (*Bowman v. City of Petaluma* (1986) 185 Cal.App.3d 1065, 1075; see
13 *River Valley Preservation Project v. Metropolitan Transit Dev. Bd.* (1995) 37 Cal.App.4th
14 154, 166; see *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th
15 689, 703. The “substantial evidence” test requires the court to determine “whether the act or
16 decision is supported by substantial evidence in the light of the whole record.” (*Chaparral*
17 *Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1143; *River Valley Preservation*
18 *Project v. Metropolitan Transit Develop. Bd.* (1995) 37 Cal.App.4th 154, 168.)

19 When applying the substantial-evidence standard, the court must focus not upon the
20 “correctness” of a report’s environmental conclusions, but only upon its “sufficiency as an
21 informative document.” (*Laurel Heights I* 47 Cal.3d at 393.) The findings of an administrative
22 agency are presumed to be supported by substantial evidence. (*Taylor Bus. Service, Inc. v.*
23 *San Diego Bd. of Education* (1987) 195 Cal.App.3d 1331.) The court must resolve reasonable
24 doubts in favor of the findings and decision. (*Id.*)

25 A claim that the EIR lacks *sufficient* information regarding an issue will be treated as
26 an argument that the EIR is not supported by substantial evidence. (*Barthelemy v. Chino*
27 *Basin Munic. Water Dist.* (1995) 38 Cal.App.4th 1609, 1620.) The petitioners in *Barthelemy*
28

1 asserted that it was a failure to proceed in the manner required by law where an EIR did not
2 include key information. The court rejected that argument.

3 **a) The Definition of “Substantial Evidence”**

4 Substantial evidence is “enough relevant information and reasonable inferences” to
5 allow a “fair argument” supporting a conclusion, in light of the whole record before the lead
6 agency. (14 CCR § 15384(a); PRC §21082.2; *City of Pasadena v. State of California* (2nd
7 Dist.1993) 14 Cal.App.4th 810, 821-822.) Other decisions define “substantial evidence” as
8 that with “ponderable legal significance,” reasonable in nature, credible, and of solid value.
9 (*Stanislaus Audubon Society, Inc., v. County of Stanislaus* (1995) 33 Cal.App.4th 144.)

10 Substantial evidence includes facts, reasonable assumptions predicated upon facts,
11 and expert opinion supported by facts. (PRC §21082.2(c); see also Guidelines 15064(g)(5),
12 15384.) It does not include argument, speculation, unsubstantiated opinion or narrative,
13 clearly incorrect evidence, or social or economic impacts not related to an environmental
14 impact. (Guideline 15384.)

15 **3. Prejudicial Abuse of Discretion**

16 A court may only issue a writ in a CEQA case for an abuse of discretion, including
17 making a finding without substantial evidence, if the error was *prejudicial*. (*Chaparral*
18 *Greens v. City of Chula Vista* (1996) 50 Cal.App.4th 1134, 1143.) The court must defer to the
19 agency’s substantive conclusions and uphold the determination unless. ((Id); see PRC §
20 21168, 21168.5, *Laurel Heights I, supra*, 47 Cal.3d at 392, fn.5; Remy, et al., Guide to the
21 California Environmental Quality Act (10th Ed.1999) Chapter XI (D), p.590.)

22 **4. Tiered EIRs**

23 As discussed further below, the PEIR here is a tiered EIR prepared in accordance with
24 Guideline 15183.5, which specifically allows for preparation of an overall, first-tier EIR and
25 planning document to govern analysis of GHG emissions and control GHG emissions in order
26 to comply with the statewide mandates to reduce GHG emissions.
27

28 A tiered EIR scheme allows an agency to produce a general EIR focusing on an
overall plan or policy and later conduct more limited, narrow subsequent EIR review for

1 individual projects within the broad plan or scope of the original, general EIR. (PRC 21068.5,
2 21093(a); Guideline 15152; *Koster v. County of San Joaquin* (1996) 47 Cal.App.4th 29, 36.)

3 “Tiering” is defined in PRC 21068.5 as:

4 coverage of general matters and environmental effects in an [EIR] prepared for a
5 policy, plan, program or ordinance followed by narrower or site-specific [EIRs] which
6 incorporate by reference the discussion in any prior [EIR] and which concentrate on
7 the... effects which (a) are capable of being mitigated, or (b) were not analyzed... in
8 the prior [EIR].

9 In other words, it is ‘a process by which agencies can adopt programs, plans, policies, or
10 ordinances with EIRs focusing on “the big picture” and can use streamlined CEQA review for
11 individual projects that are consistent with such... [first tier plans]....’ (*Koster v. County of*
12 *San Joaquin* (3d Dist. 1996) 47 Cal.App. 4th 29, 36.) The later EIRs need not repeat the
13 analysis or revisit the issues from the original EIR. (Guideline 15385.)

14 Guideline 15152 is the overall provision governing first-tier documents in general and
15 in its detailed discussion demonstrates clearly what such documents must do, what they must
16 include, and how they may be used.ⁱ Environmental impact reports “shall be tiered whenever
17 feasible, as determined by the lead agency.” (PRC 21093(b).) This “is needed in order to
18 provide increased efficiency in the CEQA Process. It allows agencies to deal with broad
19 environmental issues in EIRs at planning stage and then to provide more detailed examination
20 of specific effects....These later EIRs are excused by the tiering concept from repeating the
21 analysis of the broad environmental issues examined in the [first tier] EIRs.” (Discussion
22 following Guideline 15385.)

23 PRC 21094(c) states that “[f]or purposes of compliance with this section, an initial
24 study shall be prepared to assist the lead agency in making the determinations required by this
25 section.”

26 27 **C. GREENHOUSE GAS EMISSIONS**

28 The Global Warming Solutions Act (“the Act”) ‘implements deep reductions in
greenhouse gas emissions, recognizing that “[g]lobal warming poses a serious threat to the

1 economic well-being, public health, natural resources, and the environment of California...”
2 (Health & Saf.Code, § 38501, subd. (a).) Through this enactment, the Legislature has
3 expressly acknowledged that greenhouse gases have a significant environmental effect.’
4 (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 91
5 (*CEB*).) Guideline 15183.5 governs tiering and streamlining the analysis of GHG
6 emissions.ⁱⁱ Subdivision (b) sets forth the specific things such a plan should do.

7 **1. The Role of the CAP in Subsequent GHG Analysis**

8 A key issue is the ultimate role this CAP will play in subsequent GHG analysis of
9 future projects. Here neither party clearly addresses the intended role and effect of the CAP
10 in the review of subsequent projects.

11 The CAP at 1013-1016 generally indicates that the CAP is intended to eliminate any
12 need to conduct any GHG analysis in future discretionary projects that comply with the CAP.
13 Specifically, the introduction to the checklist of standards and measures, states that:

14 Discretionary projects that utilize the checklist, as modified by the individual agency,
15 and can demonstrate consistency with all applicable mandatory local or regional
16 measures in the CAP, can conclude that their impacts related to [GHG] emissions
17 would be less than significant under CEQA because the project would be consistent
18 with a qualified GHG reduction plan under... Guidelines Section 15183.5.

19 The introduction then quotes 15183.5(b) and (b)(2) in part as follows:

20 (b) Pursuant to sections 15064(h)(3) and 15130(d), a lead agency may determine that a
21 project's incremental contribution to a cumulative effect is not cumulatively
22 considerable if the project complies with the requirements in a previously adopted
23 plan or mitigation program under specified circumstances.

24 ...

25 (b)(2) A plan for the reduction of greenhouse gas emissions, once adopted following
26 certification of an EIR or adoption of an environmental document, may be used in the
27 cumulative impacts analysis of later projects. An environmental document that relies
28 on a greenhouse gas reduction plan for a cumulative impacts analysis must identify

1 those requirements specified in the plan that apply to the project, and, if those
2 requirements are not otherwise binding and enforceable, incorporate those
3 requirements as mitigation measures applicable to the project.

4 It reiterates that the ‘significance threshold for projects using the checklist for streamlining is
5 “consistency with an applicable plan for the reduction of [GHG] emissions meeting the
6 requirements of...15183.5” ’ All of this indicates an intent that a future project complying
7 with this CAP and its standards and measures need include no independent GHG analysis.

8 **2. Respondent’s Contention That Petitioner Imposes Non-Existent Requirements**

9 Respondent argues, that Petitioner is improperly trying to impose requirements on the
10 CAP that do not exist in Guideline 15183.5. This argument is expressly stated at the start of
11 its brief and is repeated throughout its papers. This argument is itself groundless; it is
12 contrary to the fundamental purpose of CEQA requirements.

13 First, Respondent contends that the Guideline merely gives a list of what such a plan
14 “should” do; not what it “must” do. Although the Guideline does only state what such a plan
15 “should” include, (see end note ii, Guideline 15183.5), it expressly states that it is a tiering
16 mechanism and that it must comply with the standards for first-tier programs or plan EIRs. It
17 is *titled* “Tiering and Streamlining the Analysis of Greenhouse Gas Emissions.” (Emphasis
18 added.) It begins by explaining that agencies may develop a GHG plan or standards in a plan
19 using a tiering method, governed by the standards for tiering. It states that agencies *may*
20 handle GHG analysis:

21 at a *programmatic* [i.e., first-tier] level, such as in a general plan, a long range
22 development plan, or a separate plan to reduce greenhouse gas emissions. *Later*
23 project-specific environmental documents *may tier from* and/or incorporate by
24 reference that existing programmatic review. Project-specific environmental
25 documents *may* rely on an EIR containing a programmatic analysis of greenhouse gas
26 emissions as provided in *section 15152 (tiering), 15167 (staged EIRs) 15168*
27 *(program EIRs), 15175-15179.5 (Master EIRs), 15182 (EIRs Prepared for Specific*
28 *Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning).*

1 (emphasis added.)

2 As noted above, the CAP also makes it clear that, as a first-tier document, it is to be
3 used in such a manner that, if complied with, will excuse the analysis of a future project from
4 revisiting GHG emissions. Therefore, the CAP, and any such plan prepared under 15183.5,
5 must meet the requirements for all first-tier documents and thus must impose effectively
6 enforceable requirements and measures with defied performance standards.

7 Second, although Respondent is correct that the requirements on which Petitioner
8 relies are not necessarily in the Guideline itself, they are applicable to *all* CEQA review and,
9 specifically, to first-tier documents, as explained above. Petitioner's further arguments, such
10 as that the CAP must provide a clear, complete, and accurate GHG "inventory," i.e., the
11 existing GHG emissions associated with activities in the county, are consistent with a
12 standard CEQA mandate, which is that an environmental document must present clear,
13 meaningful information sufficient to allow the agency and public to make an intelligent,
14 informed decision, or, stated another way, sufficient to make clear the analytic route of the
15 agency. (*Concerned Citizens of Costa Mesa, Inc. v. 32nd District Agricultural Association*
16 (1986) 42 Cal.3d 929, 936; *Al Larson Boat Shop Inc. v. Bd. of Harbor Commissioners,*
17 *supra*, 18 Cal.App.4th at 749; *Topanga Assn. for a Scenic Community v. County of Los*
18 *Angeles* (1974) 11 Cal.3d 506, 513-514, 522. Therefore, it must be based on substantial
19 evidence. (See section C.2., above.)
20

21 **3. Existing Conditions**

22 Petitioner first argues that the PEIR fails to describe existing conditions accurately
23 because it limits the range of emissions from vehicles miles traveled (VMT) associated with
24 land-use activities in the county and to and from 18 nearby regional locations. Petitioner
25 contends that the baseline or current GHG emissions level associated with the county should
26 include all VMT for trips associated with activities in the county, not only within the county
27 and to and from the 18 nearby regional locations used in the PEIR and that Respondent thus
28 understates the current GHG emissions. Respondent focuses on two general categories of
VMT omitted from the PEIR: VMTs generated by goods exported from the county to

1 locations beyond (produce, medical equipment, beer, and wine) , and tourist travel to Sonoma
2 County.

3 **a) CEQA Baselines and Quantifying Current GHG Levels**

4 Ordinarily, an EIR must clearly and consistently describe the baseline, which is
5 *normally* the *existing* environmental setting or conditions. The existing conditions, at the time
6 the notice of preparation ("NOP") is published, "normally constitute the baseline physical
7 conditions by which the lead agency determines whether an impact is significant." (Guideline
8 15125(a).) Guideline 15126.2(a) states that the agency "should normally limit its examination
9 to changes in the existing physical conditions in the affected area as they exist at the
10 time...environmental analysis is commenced."

11 Guideline 15183.5(b)(1)(A) sets forth special requirements for GHG first-tier plans
12 such as the CAP. Such plans are required to "[q]uantify greenhouse gas emissions, both
13 existing and projected over a specified time period, resulting from activities within a defined
14 geographic area."

15 Respondent notes that the ordinary requirements governing determination of the
16 "baseline" apply where there is a project that may alter this in of itself in order to determine
17 the extent of any impact which a project will have. (See Guideline 15126.2(a).)

18 **b) VMT Data**

19 The CAP explanation of how it determined the GHG inventory is found at AR 1050,
20 et seq. It used 2010 data because that year includes largely complete or complete activity data
21 for all sectors as needed to calculate GHG levels; this is not challenged by Petitioner. (See
22 AR 1052; Memorandum of Points and Authorities in Support of Petition for Writ of Mandate,
23 9:1-3.) The response to comment at AR 1084 explains that the VMTs were determined by
24 considering the travel in the county plus travel between the county and 18 external "traffic
25 analysis zones" ("TAZ").

26 Respondent relies on Guideline 15130(b) which provides that studies of cumulative
27 impacts are guided by "standards of practicality and reasonableness." According to Guideline
28 15364, "Feasible" means capable of being accomplished in a successful manner within a

1 reasonable period of time, taking into account economic, environmental, legal, social, and
2 technological factors.’ Thus, “[a]n evaluation of the environmental effects of a proposed
3 project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of
4 what is reasonably feasible The courts have looked not for perfection but for adequacy,
5 completeness, and a good faith effort at full disclosure.” (Guideline 15151; see also *Citizens*
6 *to Preserve the Ojai v. County of Ventura, supra*, 176 Cal.App.3d at 429.) Petitioner argues
7 that an agency is “not required to engage in sheer speculation as to future environmental
8 consequences [Citations], [but an] EIR [is] required to set forth and explain the basis for any
9 conclusion that analysis of the cumulative impact of offshore emissions [is] wholly infeasible
10 and speculative.” (*Citizens to Preserve the Ojai, supra*, 176 Cal.App.3d at 430.)

11 Respondent correctly argues that ultimately GHG emissions must be considered in
12 light of their cumulative worldwide impact because of their nature. The Supreme Court in
13 *Center for Biological Diversity v. California Dept. of Fish and Wildlife* (2015) 62 Cal.4th 204,
14 at 219-220, considered a challenge to an agency’s GHG analysis. The Court explained:

15 [W]e address two related aspects of the greenhouse gas problem that inform our
16 discussion of CEQA significance.

17 First, because of the global scale of climate change, *any one project's contribution is*
18 *unlikely to be significant by itself. The challenge for CEQA purposes is to determine*
19 *whether the impact of the project's emissions of greenhouse gases is cumulatively*
20 *considerable*, in the sense that “the incremental effects of [the] individual project are
21 considerable when viewed in connection with the effects of past projects, the effects of
22 other current projects, and the effects of probable future projects.” (§ 21083, subd.
23 (b)(2); see Guidelines, § 15064, subd. (h)(1).) “With respect to climate change, an
24 individual project's emissions will most likely not have any appreciable impact on the
25 global problem by themselves, but they will contribute to the significant cumulative
26 impact caused by greenhouse gas emissions from other sources around the globe. *The*
27 *question therefore becomes whether the project's incremental addition of greenhouse*
28 *gases is ‘cumulatively considerable’ in light of the global problem, and thus*

1 significant.” (Crockett, Addressing the Significance of Greenhouse Gas Emissions
2 Under CEQA: California's Search for Regulatory Certainty in an Uncertain World
3 (July 2011) 4 Golden Gate U. Env'tl. L.J. 203, 207–208 (hereafter Addressing the
4 Significance of Greenhouse Gas Emissions).)

5 Second, the global scope of climate change and the fact that carbon dioxide and other
6 greenhouse gases, once released into the atmosphere, are not contained in the local
7 area of their emission means that *the impacts to be evaluated are also global rather*
8 *than local. For many air pollutants, the significance of their environmental impact*
9 *may depend greatly on where they are emitted; for greenhouse gases, it does not.* For
10 projects, like the present residential and commercial development, which are designed
11 to accommodate long term growth in California's population and economic activity,
12 this fact gives rise to an argument that a certain amount of greenhouse gas emissions is
13 as inevitable as population growth. Under this view, a significance criterion framed in
14 terms of efficiency is superior to a simple numerical threshold because CEQA is not
15 intended as a population control measure.

16 (emphasis added.)

17 Consistent with the Supreme Court’s discussion in that case, the EIR here expressly
18 discusses the global nature of GHG emissions, explaining that “unlike other resource areas
19 that are primarily concerned with localized project impacts... the global nature of climate
20 change requires a broader analytic approach. Although this section focuses on GHG
21 emissions generated as a result of the CAP, the analysis considered them in the context of
22 potential state, national, and global GHG impacts.” (AR 314.) It also noted global GHG
23 concentrations. (AR 81, 106, 316.)

24 The PEIR analysis considered VMT for the county and the 18 TAZs in the region, and
25 only for automobile traffic and “emissions that local governments have primary influence or
26 control over.” (AR 85.) It did not consider travel by other means such as by airplane or
27 emissions over which the local entities have no direct control. (AR 85.) The PEIR explained
28

1 at AR 82 and 85 that it was relying on the International Council for Local Environmental
2 Initiatives (ICLEI) Protocol and that:

3 the ICLEI Community Protocol does not require air travel emissions to be included in
4 the basic emissions necessary for protocol-compliance GHG inventories because it
5 recognizes that local governments have less control over such sources as air travel and
6 that information is often not available to precisely describe an airport's emissions to a
7 specific community.

8 Similarly, it noted that methodologies exist to estimate emissions further afield but associated
9 with local activities but rejected these methodologies because the information might be
10 difficult to obtain or are not "common" approaches. (AR 85-86.) For example, the response
11 to the comment at AR 85-86 stated:

12 [w]hile there are methodologies to estimate upstream emissions..., these
13 methodologies are commonly used to prepare what is known as a "consumption-
14 based" inventory, which estimate the life cycle "carbon footprint" of everything
15 households (and...other consumers) consume. There are also methodologies to
16 estimate "downstream" emissions associated with the transportation, end use, and
17 disposal of goods produced in a jurisdiction, but such methodologies require highly
18 detailed information about the entire downstream supply chain, including the ultimate
19 geographical destination of goods that can be difficult to come by, especially if such
20 data is privately held. While one could estimate emissions using a consumption-based
21 approach of a "downstream" emissions method, these are not the common approach
22 used for community emissions, or national emissions at present, and if used, would
23 make it impossible to compare regional inventories.

24 As a result, the response contends, "nearly every" national, state, and local agency preparing a
25 CAP has used the "activity-based" approach to calculate and define the GHG inventories.
26 (AR 86.) Respondent asserts that by avoiding the methodologies which include upstream or
27 downstream data, and instead using the ICLEI Protocol, the CAP inventory "can be compared
28 to those other communities, using a common standard..." (Ibid.)

1 The question before the court is whether there is information in the record showing
2 that Respondent might or might not feasibly have included the additional data as Petitioner
3 contends, or whether Respondent did not need to include it.

4 Respondent's primary argument that it did not need to include additional emissions
5 estimates is based on its assertion that CEQA only requires an agency to do what is feasible,
6 and further that it need not, and should not, engage in speculation over data that is
7 unknowable. The basic that a public agency is only required to do what is feasible, discussed
8 above, is correct, but Respondent has not persuasively shown that it defeats Petitioner's
9 arguments regarding the need for more information about MVT. The response to comments
10 at AR 84-86 expressly admits that there are methodologies to quantify the additional sources
11 of GHG emissions Petitioner identifies, but did not use them because they are not
12 "commonly" used or the information "can be difficult to come by." This argument does not
13 establish that Respondent had substantial evidence to support its approval.

14 The record, including the admissions in the PEIR shows that Respondent had a
15 feasible ability to include the additional GHG data. Respondent compares the data used in
16 this CAP to that used by other agencies. (AR 86; generally AR 84-86.) This is a logical
17 explanation for employing the ICLEI Protocol used, but it does not demonstrate that it was
18 "infeasible" to obtain the additional MVT data, especially given that Respondent
19 acknowledges that the methodologies exist.

20 Had the EIR explained that it was unable to obtain the necessary information, or that
21 there were no methodologies that it could have used to obtain/include it, Respondent's would
22 have been justified in failing to obtain this data. However, here, Petitioner complains that
23 Respondent appears merely to have avoided including greater, more complete, information
24 based on the assumption that it would be "too much work."

25 The court grants the petition on this point.

26 **D. MITIGATION MEASURES**

27 Petitioner also argues that Respondent failed to adopt "definite, clearly defined and
28 enforceable" mitigations measures. It contends that at least some of the mitigation measures

1 and standards it sets forth are unclear, vague, and not fully enforceable. Petitioner points out
2 that the EIR concludes that the CAP would be “beneficial” and would thus support applicable
3 regulatory plans for reducing GHG emissions, so, it contends, no mitigation for GHG
4 emissions is necessary. (AR 204.)

5 Respondent argues that the CAP is not intended as a mitigation measure. No
6 mitigation is needed because it is a plan to reduce GHG emissions in subsequent projects.

7 What Petitioner contends is not that the CAP and EIR need to adopt mitigation
8 measures for the CAP itself, but instead that the CAP, in setting forth purported mitigation
9 measures for future analysis and handling of GHG emissions, fails to present sufficient clearly
10 defined and enforceable mitigation measures and standards.

11 Respondent points out this is not a “project” in the sense of an activity that will do
12 anything that might create GHG emissions but instead is a plan for handling analysis and
13 mitigation of GHG emissions in future projects. Therefore, there is clearly nothing about this
14 Project to mitigate. Petitioner's contention that the PEIR should imposing sufficiently defined
15 and enforceable mitigations measures, is a different issue.

16 Guideline 15183.5(b)(1)(D) and (E) are instructive. Subdivision (D) states that the
17 plan should “[s]pecify measures or a group of measures, including performance standards,
18 that substantial evidence demonstrates, if implemented on a project-by-project basis, would
19 collectively achieve the specified emissions level. Subdivision (E) states that the plan should
20 “[e]stablish a mechanism to monitor the plan's progress toward achieving the level and to
21 require amendment if the plan is not achieving specified levels.” (Emphasis added.)
22

23 **1. Role and Purpose of Mitigation Measures in CEQA**

24 Mitigation measures are needed, even required, where a project may have a significant
25 impact and the purpose of the measures is to reduce any impact to less than significant. (PRC
26 21003.1(b); Guideline 15002(a)(3).)

27 **2. Deferral of Mitigation**

28 In general, it is improper for an agency to rely on *deferred* mitigation. (*Sundstrom v.*
County of Mendocino (1988) 202 Cal.App.3d 296, 306; *Defend the Bay v. City of Irvine*

1 (2004) 119 Cal.App.4th 1261, 1275-1276.) An agency cannot find a significant impact to be
2 mitigated to a less-than-significant level based on a deferred mitigation measure. (*Sundstrom*
3 *v. County of Mendocino, supra*, 202 Cal.App.3d at 306. It is a violation of CEQA when an
4 agency “simply requires a project applicant to obtain a biological report and then comply with
5 any recommendations that may be made in the report. [Citation.]” (*Defend the Bay v. City of*
6 *Irvine* (2004) 119 Cal.App.4th 1261, 1275; see also *Endangered Habitats League, Inc. v.*
7 *County of Orange* (2005) 131 Cal.App.4th 777, 793.)

8 “Deferral of the specifics of mitigation is permissible where the local entity commits
9 itself to mitigation and lists the alternatives to be considered, analyzed and possibly
10 incorporated in the mitigation plan.” (*Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th
11 1261, 1275-1276; see also *Sacramento Old City Assn. v. City Council* (1991) 229 Cal.App.3d
12 1011, 1028-1030.) This applies where “mitigation is known to be feasible, but where the
13 practical considerations prohibit devising such measures early,” so that “[w]here future action
14 to carry a project forward is contingent on devising means to satisfy such criteria, the agency
15 should be able to rely on its commitment as evidence that significant impacts will in fact be
16 mitigated.” (*Sacramento Old City Assn., supra*, 229 Cal.App.3d at 1028-1029.)

17 Because of the nature of first-tier tier EIRs, in particular, deferral of the specifics of
18 mitigation measures, as long as they contain clear performance standards, is particularly
19 appropriate and logical. (See, e.g., *Rio Vista Farm Bureau Center v. County of Solano* (1st
20 Dist.1992) 5 Cal.App.4th 351 (“*Rio Vista Farm Bureau*”); *Al Larson Boat Shop Inc. v. Bd. of*
21 *Harbor Commissioners, supra*, 18 Cal.App.4th 729.) In *Rio Vista Farm Bureau*, a first-tier
22 “program EIR” serving as “primary planning document for hazardous waste management in
23 the county” was found to contain sufficient mitigation measures adopted as policies to guide
24 subsequent projects. The court rejected a challenge based on the assertion that the mitigation
25 measures were “vague, inconclusive, and even inconsistent,” finding the measures sufficient
26 “given the broad, nebulous scope of the project under evaluation.” (*Rio Vista Farm Bureau,*
27 *supra*, 5 Cal.App.4th at 376.) The court found that the specificity of mitigation measures
28

1 should be proportionate to the specificity of the underlying project, which in that case was a
2 broad planning document to guide later site-specific projects.

3 The court in *Coastal Hills Rural Preservation v. County of Sonoma* (2016) 2
4 Cal.App.5th 1234, 1258, upholding the trial court’s order denying a CEQA petition for writ of
5 mandate, explained that although “CEQA usually requires mitigation measures to be defined
6 in advance” and not deferred, “deferral [of mitigation measures] is permitted if, in addition to
7 demonstrating some need for deferral, the agency (1) commits itself to mitigation; and (2)
8 spells out, in its environmental impact report, the possible mitigation options that would meet
9 “specific performance criteria” contained in the report.”

10 In *Sundstrom, supra*, the county required future hydrological studies as conditions of a
11 use permit and required that any mitigation measures that the study suggested would become
12 mandatory. This was held to be improper because the impacts and mitigation measures were
13 not determined.

14 The court in *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359 found an Negative
15 Declaration defective because it improperly relied on deferred formulation of specific
16 mitigation measures. There, the city required the applicant to comply with any existing
17 ordinance protecting the Stephens’ kangaroo rat and allowed the city to require a biological
18 report on the rat and compliance with any recommendations in the report. The court found
19 this to be insufficient because it, like the approval in *Sundstrom*, was based on compliance
20 with a report that had not yet even been performed.

21 By contrast, the court in *Schaeffer Land Trust v. San Jose City Council* (1989) 215
22 Cal.App.3d 612, upheld an Negative Declaration for a general plan amendment for a parcel of
23 land which, regarding traffic issues, required any future development to comply with
24 applicable “level of service” standards. Unlike the other cases mentioned above, here the
25 mitigation measures were delayed because the development and impacts were not concrete,
26 but the mitigation was fixed to set standards which, by definition, ensured that there would be
27 no significant impact. Mitigation with deferred specifics was found to satisfy CEQA where
28 the lead agency had committed to mitigation meeting a specified range of criteria and project

1 approval required the developer to obtain permits and adopt seven itemized measures in
2 coordination and consultation with relevant agencies. *Defend the Bay, supra*, 1276.

3 In *Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th
4 777, 794, the court found a mitigation measure that required replacement habitat preservation
5 to satisfy CEQA even though the specifics were not fully determined but where the approval
6 set forth *specific possibilities and parameters that the mitigation needed to meet*.

7 **3. The Role of the CAP in Subsequent GHG Analysis**

8 The key issue here in determining the sufficiency of mitigation measures is the role
9 this CAP is intended to play in a GHG analysis of future projects. As noted above, one aspect
10 of first-tier plans and EIRs is that they may obviate the need for later projects falling within
11 their ambit to conduct new CEQA review on certain issues where the future projects comply
12 with the first-tier plan. Any later discretionary project that complies with its criteria, such as
13 the standards and requirements it imposes, would not need to do further study of GAG
14 emissions. Accordingly, the standards and requirements the CAP imposes for reducing or
15 minimizing GHG emissions must be considered mitigation measures for purposes of CEQA
16 and must comply with the CEQA requirements. This means that they must set forth clearly
17 defined and enforceable performance standards to be met. Because of the intended
18 streamlining, Petitioner correctly contends that the performance standards and measures set
19 forth the PEIR must be clear, definite, and enforceable.
20

21 Here also, Respondent contends that Petitioner is imposing requirements and standards
22 that do not exist in Guideline 15183.5. Respondent ignores the fundamental CEQA
23 requirements which underlie Petitioner's claims. Respondent contends that Guideline 15183.5
24 does not require mitigation measures for the CAP or within the CAP imposed on future
25 projects. This position not only conflicts with 15183.5 itself, it is fundamentally contrary to
26 the principles of CEQA review.

27 It is axiomatic in CEQA that any measures or requirements imposed be sufficiently
28 defined to be enforceable and that, in the context of tiering, any subsequent project may avoid
analysis of an issue only if it complies with a first-tier document that satisfies CEQA

1 requirements. As noted above, PRC 21094(a) states that where a prior first-tier EIR has been
2 certified and applies to a subsequent project, the agency “*need not examine those effects*
3 *which ... were either (1) mitigated or avoided... as a result of the prior [EIR] or (2) examined*
4 *at a sufficient level of detail in the prior [EIR] to enable those effects to be mitigated or*
5 *avoided by site specific revisions, the imposition of conditions, or by other means....”*

6 Accordingly, to obviate the need to address an issue or impact as part of a later project’s
7 CEQA review, a first-tier plan or program document and EIR must sufficiently analyze that
8 issue or impact to determine that compliance with the document and its mitigations will
9 mitigate or avoid the impact. The mitigation requirements in a first-tier document for
10 avoiding or mitigating the impact *must* include performance standards that are mandatory and
11 include specific, and effectively enforceable performance standards. (*Coastal Hills Rural*
12 *Preservation v. County of Sonoma* (2016) 2 Cal.App.5th 1234, 1258.)

13 The prior discussion of Guideline 15183.5 addresses the impact of tiering
14 mechanisms. Again, the CAP, and any such plan prepared under 15183.5, must meet the
15 requirements for all first-tier documents and thus must impose effectively enforceable
16 requirements and measures with defined performance standards.

17 Further, Guideline 15183.5 *does require the CAP to impose mitigation measures on*
18 *future projects.* As both Respondent and the CAP itself acknowledge, and as noted above,
19 subdivision (b) expressly states that “a lead agency may determine that a project’s incremental
20 contribution to a cumulative effect is not cumulatively considerable *if* the project complies
21 with *the requirements* in a previously *adopted plan or mitigation program* under specified
22 circumstances.” This plan or mitigation program, i.e., the CAP, according to (b)(2), “*may be*
23 *used in the cumulative impacts analysis of later projects*” which clearly means that it need not.
24 However, (b)(2) continues to state that *if it is* so used for a later project, that project must
25 comply with the requirements and mitigation measures from the CAP. Once again, in the
26 Guideline’s words, a later project that in fact “relies on [the CAP] for a cumulative impacts
27 analysis *must* identify those *requirements specified in the plan* that apply to the project, and, *if*
28

1 *those requirements are not otherwise binding and enforceable, incorporate those*
2 *requirements as mitigation measures....”*

3 In countering Petitioner's complaint that some of the so-called measures or standards
4 are too vague or loose or ill-defined to be properly enforceable, Respondent asserts that this
5 will be “cured” because Guideline 15183.5(b)(2) states that any requirements that are not
6 “binding and enforceable” will be incorporated as mitigation measures in the project’s CEQA
7 document. This “interpretation” does not withstand scrutiny. As explained above, a first-tier
8 document, in order to be used to avoid revisiting analysis of an issue in a later project, must
9 have sufficiently analyzed the issue and found any significant impact to be mitigated or
10 avoided by complying with the document. That means that any requirement, such as
11 mitigation, must have sufficiently defined, clear, and mandatory performance standards to be
12 effectively enforceable and to have predictable results. If the requirements or measures are so
13 ill-defined as to be unenforceable as a practical matter, and effectively meaningless, merely
14 “incorporating” them into the later project’s CEQA document will obviously not fix that
15 problem. What the state in the Guideline must mean, therefore, is not that an ineffective
16 measure may simply be incorporated into a later project’s document, as Respondent asserts,
17 but that a measure or requirement must be incorporated in the document *if it is not enforced*
18 *independently, or through some other mechanism.*

20 **4. The Measures in the CAP**

21 The CAP sets forth requirements and standards or mitigation measures at AR 1015-
22 1048.

23 Respondent primarily argues that under Guideline 15183.5(b)(2), any measure which
24 the CAP imposes and which is “not otherwise binding and enforceable” must be incorporated
25 into future projects. As addressed above, this argument is not meritorious. Guideline
26 15183.5(b)(2) expressly requires that:

27 *“An environmental document that relies on a greenhouse gas reduction plan for a*
28 *cumulative impacts analysis must identify those requirements specified in the plan that*
apply to the project, and, if those requirements are not otherwise binding and

1 *enforceable, incorporate those requirements as mitigation measures* applicable to the
2 project. *If there is substantial evidence that the effects of a particular project may be*
3 *cumulatively considerable notwithstanding the project's compliance with the specified*
4 *requirements in the plan for the reduction of greenhouse gas emissions, an EIR must*
5 *be prepared for the project.*

6 (emphasis added.)

7 Petitioner singles out three of the specific measures or requirements in the CAP for
8 discussion as demonstrating a lack of meaningful enforceability and clear standards.

9 **a) 5-R4 (AR 1026)**

10 The first is 5-R4 (AR 1026.) This “trip-reduction ordinance” requires employers with
11 50+ employees to offer one of several options to employees in order to reduce GHG
12 emissions: “pre-tax transit expenses, transit or vanpool subsidy, free or low cost shuttle, *or an*
13 *alternative benefit.*” (Emphasis added.) It is the latter to which Petitioner objects, arguing
14 that it is vague and undefined either in what it must be like or what it must achieve, so that
15 there is no way to enforce this. As a result, Petitioner contends, a project could offer as
16 “alternative benefit” which no-one can at this point predict, and argue that it need not do GHG
17 analysis because it has “complied” with this measure. Respondent contends that an
18 alternative of purchasing GHG offsets is considered and this is correct but this is not the
19 definition of “an alternative benefit,” which is left open and could be anything. Petitioner is
20 correct on this point.

21 Respondent contended that Petitioner failed to exhaust administrative remedies on this
22 specific issue.

23 According to PRC section 21177, “[a] person shall not maintain an action or
24 proceeding unless that person objected to the approval of the project orally or in writing
25 during the public comment period provided by this division or prior to the close of the public
26 hearing on the project before the filing of the notice of determination.” This does not,
27 however, bar an association or organization formed after approval from raising a challenge
28 which one of its constituent members had raised, directly or by agreeing with or supporting

1 another's comments. (PRC section 21177(c).) Moreover, someone may file a legal challenge
2 based on an issue as long as "any person" raised that issue during the review process. PRC
3 section 21177(a); see *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal.3d 247, 267-
4 268. It also does not apply to any grounds of which the agency did not give required notice
5 and for which there was no hearing or opportunity to be heard. PRC section 21177(e).

6 A party challenging decision under CEQA cannot, to exhaust administrative remedies,
7 rely merely on "general objections" or "unelaborated comments." *Sierra Club v. City of*
8 *Orange* (2008) 163 Cal.App.4th 523, 535; *Coalition for Student Action v. City of Fullerton*
9 (1984) 153 Cal.App.3d 1194, 1197. However, "[l]ess specificity is required to preserve an
10 issue for appeal in an administrative proceeding than in a judicial proceeding...." *Citizens*
11 *Association for Sensible Development of Bishop Area v. County of Inyo* (1985) 172
12 Cal.App.3d 151, 163.

13 Petitioner responds that only the substance of the issue must be raised at the
14 administrative level, relying on *Save Our Residential Environment v. City of West Hollywood*
15 (1992) (Cal.App.4th 1745, 1750.) And further that less specificity is required to exhaust an
16 issue in an administrative proceeding than in a judicial one, relying on *Woodward park*
17 *Homeowners Assn. v. City of Fresno* (2007) 150 Cal.app.4th 683, 712 and *Brothers Real*
18 *Estate Group v. City of Los Angeles* (2008) 153 Cal.App.4th 1385, 1395. The court finds that
19 Petitioner did articulate this as a basic contention in the underlying administrative
20 proceedings. (AR 66 and AR 67.)

21 **b) 4-L-1 (AR 1024)**

22 Petitioner's attack 4-L-1, at AR 1024, which requires consistency with applicable
23 "adopted policies" on mixed-use and transit-oriented development, such as zoning codes,
24 general plans, etc., and states that agencies must "support mixed use [sic] development in
25 city-centers and transit-oriented development locations through their General Plans, etc." is
26 not persuasive. Petitioner contends that this is too vague because "mixed-use" has been
27 interpreted to allow hotels and tourist destinations built downtown or near rail stations.
28 Petitioner focuses on one portion of this requirement that is open-ended. Nothing indicates

1 that the type of use that could be allowed in a mixed-use development, whether store,
2 museum, eatery, office, or hotel, has any bearing on GHG emissions. Petitioner cites no
3 evidence or explanation in support of this claim and does not explain how this is material.
4 What matters is that there are clear, adopted standards mandating such development and
5 Petitioner does not challenge that portion of the measure at all.

6 It is possible that the measure could be found too vague and Petitioner may be
7 challenging it on that basis as well. Petitioner refers to it when mentioning how an
8 “undefined alternative... lacks the required specificity” and Petitioner again mentions it on the
9 following page with reference to “tentative plans” for future mitigation in ill-defined
10 subsequent regulation to be adopted. This, merely requires each jurisdiction to “identify such
11 appropriate areas and include unspecified policies and incentives to encourage development
12 near high-quality transit service.” It requires the jurisdiction to define requirements and
13 identify potential incentives, giving a list of the types that these “may include,” the last being
14 “other related items.” Again, this does not give any clear performance standards regarding
15 how to achieve this or what the parameters are. As Petitioner argues, for the third measure,
16 the court in *Communities for a Better Environment v. City of Richmond*, 184 Cal.App.4th 70,
17 92, found a measure insufficiently specific where it required reduction of mobile emission
18 sources though “transportation smart” development because “reliance on tentative plans for
19 future mitigation... significantly undermines CEQA’s goals of full disclosure and informed
20 decision making.” Under this analysis, this measure is also defective.

21
22 **c) 2-L-1 (AR 1021)**

23 Lastly, Petitioner argues that 2-L-1, at AR 1021, is defective. This measure mandates
24 that the project “comply with local requirement(s) for rooftop solar PV on new residential
25 development. It states that each jurisdiction “will define which new development must
26 provide rooftop solar [PV] by defining qualifying criteria... and the amount of solar
27 required...” As Petitioner argues, this sets no standards at all, just like 4-L-1, but instead
28 merely general principles and future possibilities. This violates CEQA.

1 Petitioner further argues that the measures in general do not guarantee any likelihood
2 of implementation. This is clear from the ones discussed above. Petitioner cites 1-R2 as
3 another example. It states that two named agencies “will work with the participating
4 communities to implement energy efficient retrofits. Actions may include: Implementing a...
5 weatherization program, expanding energy efficiency outreach/education campaigns...,
6 promoting the smart grid,” etc. Again, none of this goes beyond stating wishful thinking,
7 good intentions, and an intent to “work” with others. Measures that fall into this category
8 violate CEQA as well.

9 Petitioner also generally attacks the measures as lacking meaningful enforceability.
10 Petitioner also contends that of all of them, only 1-S1 and 1-S2 are actually enforceable
11 because they govern building energy and lighting efficiency, both controlled by state
12 regulation. The court finds a few others in addition to 1-S1 and 1-S2 to be similarly
13 enforceable. These include 1-L1, based on Windsor’s building code, 1-L2, requiring LED
14 lights in new development.

15 Aside from those few, Petitioner is correct that most are not enforceable, either
16 because they are too vague and lacking in meaningful mandatory requirements such as those
17 already discussed, which only “require” some “alternative” that is not specified or governed
18 by set parameters. Others, such as 1-L3 through 2-L2, state mitigation measures but then state
19 that these are “voluntary,” or “encouraged,” or only necessary where “applicable” based on
20 circumstances or criteria that are not defined. Others again rely on other jurisdictions such as
21 the cities creating applicable requirements that in some unspecified manner promote the
22 stated, vague, open-ended policies that lack any parameters or requirements. These are too
23 numerous to list them all here but this general characteristic dominates almost all of the
24 measures from what I have read.

25 Accordingly, the court grants the petition with respect to mitigation. Because the
26 record does not provide adequate information about extraterritorial emissions the agency and
27 the public could not and the court cannot determine whether the CAP would achieve its stated
28 goal to reduce GAG impacts to pre-1990 levels by 2020.

1 **E. ALTERNATIVES**

2 Petitioner asserts that Respondent violated CEQA by adopting as the “environmentally
3 superior alternative” the Zero Net Energy Buildings Alternative because it fails to address
4 GHG emissions from transportation while Respondent declined to evaluate an alternative with
5 a moratorium on, or significant reduction of, new or expanded vineyards, wineries and tourist
6 destinations. (AR 94; 426-427.)

7 Respondent contends that the analysis is sufficient because Petitioner believes that
8 reducing or stopping growth, and in particular growth that involves travel of people and goods
9 to and from the county, is necessary, and Petitioner cannot impose such mandates on R;
10 Respondent considered a range of alternatives; and choosing the moratorium alternative
11 would require the court to “dramatically substitute” its judgment for Respondent’s.

12 CEQA requires all EIRs to consider alternatives to the project. (*Friends of the Old*
13 *Trees v. Dept. of Forestry & Fire Protection* (1st Dist.1997) 52 Cal.App.4th 1383, 1393-1395
14 (*Friends of Old Trees*.)

15 **1. Importance and Central Role of Alternatives Analysis**

16 PRC section 21002 states that “it is the policy of the state that public agencies should
17 not approve projects as proposed if there are feasible alternatives or feasible mitigation
18 measures available which would substantially lessen the significant environmental effects...”
19 An agency may not approve a project that will result in significant impacts *unless it first finds*
20 *that mitigation measures or alternatives are infeasible*. (PRC section 21081; Guidelines
21 15091, 15093.)

22 The Supreme Court decided that considering alternatives is one of the most important
23 functions of an EIR. (*Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 197.) In fact, “[t]he
24 core of the EIR is the mitigation and alternatives sections.” (*Citizens of Goleta Valley v. Bd.*
25 *of Supervisors* (1990) 52 Cal.3d 553, 564, 566 (*Goleta II*.)

26 Without evidence regarding why the alternatives are insufficient to meet the project or
27 CEQA goals, meaningful analysis is impossible. An EIR must “explain in meaningful detail
28 the reasons and facts supporting [the] conclusion.” (*Marin Municipal Water Dist. v. KG Land*

1 *Corp. California* (1991) 235 Cal.App.3d 1652, 1664.) Failure to provide sufficient analysis
2 or alternatives makes it impossible for the court to “intelligently examine the validity of the...
3 action.” (*Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d
4 506, 513-514, 522.)

5 The alternatives must be discussed in the EIR itself, provided for public review, and
6 subject to analysis, and the agency cannot cure defects by providing analysis in its official
7 response. (See *Friends of the Old Trees, supra*, 52 Cal.App.4th at 1403-1405.)

8 **2. Authority on Analyzing Alternatives and Feasibility**

9 The discussion should evaluate the relative merits of each alternative 14 CCR
10 §15126.6(a). Respondents need not analyze or adopt alternatives that are not feasible. 14
11 CCR ' 15126.6(c), (f); *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553,
12 564, 566 (*Goleta II*). However, the document *must* consider alternatives that *are* feasible.
13 *EPIC v. Johnson* (1985) 170 Cal.App.3d 604, 610; *Friends of the Old Trees, supra*, 52
14 Cal.App.4th 1404.

15 Ultimately, determining if alternatives are suitable involves a three-part test governed
16 by the “rule of reason” as set forth in Guideline 15126.6. (See *Citizens of Goleta Valley v.*
17 *Bd. of Supervisors* (1990) 52 Cal.3d 553, 564, 566 (*Goleta II*); *Save San Francisco Bay*
18 *Association v. San Francisco Bay Conservation and Development Commission* (1992) 10
19 Cal.App.4th 908, 919.) The analysis must consider alternatives that 1) may “attain most of the
20 basic objectives of the project,” 2) reduce or avoid the project’s impacts, and 3) are
21 “potentially feasible.” (Guideline 15126.6(a), (f).)

22 The analysis of alternatives is required to set forth facts and “*meaningful analysis*” of
23 these alternatives rather than “just the agency’s bare conclusions or opinions.” (*Laurel*
24 *Heights I, supra*, 47 Cal.3d 376, 404-405; *Goleta II, supra*, 52 Cal.3d 569; *Preservation*
25 *Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1353.) All analysis must
26 include “detail sufficient to enable those who did not participate... to understand and to
27 consider meaningfully” the alternatives. (*Laurel Heights I, supra*, 404-405.)
28

1 As notes above, “feasible” means able to be “accomplished in a successful manner
2 within a reasonable period... taking into account economic, environmental, social, and
3 technological factors.” (PRC section 21061.1.)

4 When the agency determines that alternatives are infeasible, it “shall describe the
5 specific reasons for rejecting identified...project alternatives.” (Guideline 15091(a), (c).) The
6 analysis of alternatives is required to set forth facts and “*meaningful analysis*” of these
7 alternatives rather than “just the agency’s bare conclusions or opinions.” (*Laurel Heights I*,
8 *supra*, 47 Cal.3d 376, 404-405; *Goleta II, supra*, 52 Cal.3d 569; *Preservation Action Council*
9 *v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1353.) All analysis must include “detail
10 sufficient to enable those who did not participate... to understand and to consider
11 meaningfully” the alternatives. (*Laurel Heights I, supra*, 404-405.)

12 The agency must make findings identifying specific considerations making an
13 alternative infeasible and the specific benefits of the Project that outweigh the relative harm.
14 (PRC § 21002.1(b), 21081, Guideline 15092(b); *Preservation Action Council, supra*, 1353.)

15 On the other hand, as usual, the requirement is one of reasonableness and a “crystal
16 ball” inquiry is not necessary. (*Residents Ad Hoc Stadium Committee v. Bd. of Trustees* (3d
17 Dist.1979) 89 Cal.App.3d 272, 286.) The key, as with most aspects of an EIR is that the
18 agency must provide enough information about the analytical path taken to allow the court to
19 “intelligently examine the validity of the administrative action.” (*Topanga Assn. for a Scenic*
20 *Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 513-514, 522.) However, no
21 “ironclad rule” other than the “rule of reason” governs the decision. (Guideline 15126.6(a).)

22 An agency cannot find an alternative infeasible simply because the developer does not
23 want to do it. (*Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 601.)
24 In fact, the analysis must include alternatives that are reasonable “even if they substantially
25 impede the project or are more costly.” (*San Bernardino Valley Audubon Society v. County of*
26 *San Bernardino* (1984) 155 Cal.App.3d 738, 750; see also *Preservation Action Council v.*
27 *City of San Jose* (2006) 141 Cal.App.4th 1336.)
28

1 An EIR or decision thereon also cannot merely state that an alternative is infeasible
2 simply because it is too expensive or will not lead to sufficient return without providing
3 supporting analysis. (*Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th
4 1336.) “The fact that an alternative may be more expensive or less profitable is not sufficient
5 to show that the alternative is financially infeasible. What is required is evidence that the
6 *additional costs or lost profitability* are sufficiently severe as to render it impractical to
7 proceed with the project.” (*Citizens of Goleta Valley v. Board of Supervisors* (1988) 197
8 Cal.App.3d 1167, 1181; *Uphold Our Heritage, supra*, 599; (emphasis added).)

9 An alternative should be capable of “substantially lessening” adverse impacts but it
10 need only have fewer impacts and it need not be impact free. PRC 21002; Guideline
11 15126.6(a); *Citizens of Goleta Valley v. Board of Supervisors (Goleta II)* (1990) 52 Cal.3d
12 553, 566.

13 **3. Reasonable Range**

14 An EIR must describe a reasonable range of alternatives to the proposed project or its
15 location that would feasibly achieve most of the project’s objectives, while reducing or
16 avoiding any of its significant effects. (Guideline 15126.6(a), (d).)

17 The EIR “shall focus on alternatives... which are capable of avoiding or substantially
18 lessening any significant effects of the project, even if these alternatives would impede to
19 some degree the attainment of the project objective, or would be more costly.” (Guideline
20 15126.6(b).)

21 The EIR must set forth the alternatives necessary to permit a reasoned choice and in a
22 manner that will allow “meaningful evaluation.” (Guideline 15126.6(a), (d), (f); *Goleta II*;
23 see also *Laurel Heights I, supra*; see also *San Bernardino Valley Audubon Soc., Inc. v. County*
24 *of San Bernardino* (1984) 155 Cal.App.3d 738, 750-751 (the detail must allow a reasonable
25 choice “so far as environmental aspects are concerned.”).)

26 If an EIR excludes certain alternatives, it should identify the alternatives and set forth
27 the reasons. (*Goleta II, supra*, 569; Guideline 15126.6(b).) The court in determining if the
28

1 EIR included a reasonable range of alternatives may consider the entire record to determine if
2 alternatives were properly excluded from consideration. (*Goleta II, supra*, 569.)

3 Alternatives that would eliminate or reduce significant environmental impacts *must* be
4 considered even if they would cost more or “to some degree” impede attainment of the
5 project’s objectives. (Guideline 15126.6(b).)

6 **4. Detail of Relevant Decisions on the Adequacy of Alternatives**

7 In *Friends of the Old Trees, supra*, 52 Cal.App.4th 1383, an extreme case, there was
8 no discussion of alternatives in the versions submitted for public review. The agency argued
9 that the fact it considered mitigation should suffice, while the real party marked a box
10 selecting a certain method of cutting. The court also noted that the *public* brought forth “the
11 only true alternatives,” and that these were discussed only after the document was approved.
12 (*Friends of the Old Trees, supra*, 52 Cal.App.4th 1405.) The court found the discussion
13 inadequate. (*Id.*, 1403-1405.)

14 In *Citizens of Goleta Valley v. Board of Supervisors (Goleta I)*, (1988) 197
15 Cal.App.3d 1167, the EIR considered a smaller hotel to be an economically infeasible
16 alternative to the proposed hotel at issue. Because the EIR lacked *evidence* that the smaller
17 hotel was economically infeasible, the court considered it error to deny the writ of mandate.
18 The court found that although the EIR contained estimated figures of costs, the record did not
19 reveal any *evidence* which *analyzed* the alternative in terms of comparative costs, comparative
20 profits or losses, or comparative economic benefit to the project proponent, residents, or the
21 community at large. (*Id.*, 1180.)

22 The court in *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587,
23 at 599, addressed a project to demolish an historic mansion in order to construct a new,
24 smaller single-family residence. The court found that evidence that alternatives of historic
25 rehabilitation or rehabilitation with a new addition, would cost between \$4.9 million and \$10
26 million was not substantial evidence that alternatives were not economically feasible since
27 there was no evidence of the likely cost of a proposed replacement home or average cost of
28

1 building the proposed 6,000 square foot home in the city. It also found that whether the
2 developer wanted to do the alternative was irrelevant to determining if it is not feasible.

3 *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (Arambel and*
4 *Rose Development, Inc.)* (1994) 27 Cal.App.4th 713, also dealt with alternatives analysis.
5 The court found, in the context of a proposed housing development, that the discussion of
6 housing density alternatives was inadequate. The DEIR stated that a lower density would
7 “lessen the impacts,” but failed to identify which impacts it meant or to what degree. The
8 court ruled that “[s]uch a bare conclusion without an explanation of its factual and analytical
9 basis is insufficient.” *Id.*, at 736. The court went on to state:

10 That lower density might not be “economically feasible,” is not sufficient
11 justification for the failure to give basic information as to density alternatives
12 which were considered and rejected. Contrary to [respondent’s] argument,
13 [petitioners] are not required to show there are reasonable alternatives. *It is the*
14 *project proponent's responsibility to provide an adequate discussion of*
15 *alternatives....* If the project proponent concludes there are no feasible
16 alternatives, it must explain in *meaningful detail* in the EIR the basis for that
17 conclusion. Thus, even if alternatives are rejected, an EIR *must explain why*
18 each suggested alternative either does not satisfy the goals of the proposed
19 project, does not offer substantial environmental advantages or cannot be
20 accomplished.

21
22 *Id.*, at 737 (emphasis added).

23 **5. Whether Feasibility Finding Is Necessary**

24 As noted above, PRC sections 21002, 21081, and Guidelines 15091, 15093 together
25 forbid approval of a project that *will result in significant impacts without first finding that*
26 *any environmentally superior alternatives are infeasible*. Petitioner argues that Respondent
27 failed to consider an alternative that is environmentally superior.

1 **6. The Alternatives Analysis for the CAP**

2 The alternatives analysis is at AR 425-438. The PEIR explains that it developed and
3 analyzed only *one* other alternative, the Carbon Offset Alternative, in addition to the chosen
4 Zero Net Energy Buildings plan and the mandatory no-project alternative. It expressly
5 rejected a growth moratorium, reduced density, greater density, increased Sonoma Clean
6 Power, expanded transit service, 1990 Levels by 2020 (AB32), and 80% Below 1990 Levels
7 by 2020.

8 The real issue here is whether the Respondent, in rejecting formulating other
9 alternatives, has considered a reasonable range, as required, and whether Respondent has
10 provided sufficient explanation of infeasibility or other reasoning to support not considering
11 other proposed alternatives.

12 Respondent's analysis is insufficient. Respondent considered almost no range at all,
13 and only one other alternative that essentially is one that does nothing other than to authorize
14 Respondent to buy GHG offsets for all GHG impacts from projects. Although Respondent
15 argues to the contrary, this alternative seems both infeasible and at the same time would not
16 actually do anything to control or limit actual GHG production. As an alternative, this
17 appears to be one of form, but not of substance.

18 By contrast, the moratorium or reduced-development alternative which Petitioner
19 proposes, and which was presented to Respondent in public comments (see, e.g., AR 93-94,
20 response to comment) along with others noted but rejected without being developed, include
21 real solutions that differ significantly from the chosen CAP. At least some, like the
22 moratorium or growth limit, also address issues of GHG production from travel. While it is
23 logical that some may be infeasible or incompatible with goals of growth, this is not alone,
24 without explanation or support, a basis for not even considering those alternatives, or
25 modified versions. For example, Respondent noted a moratorium on growth of wineries or
26 housing “until the jobs-housing balance in the County is more equitable,” but this does not
27 even address the issues of Petitioner's proposed moratorium, it is arbitrarily limited, and it
28 does not even seem to make much sense. There is no evidence or explanation for what it

1 would be or why Respondent could not consider a similar, but different one, such as Petitioner
2 proposed. That is the purpose of actually developing and considering alternatives. Given
3 that there are available alternatives that differ drastically from what Respondent has
4 considered and given that Respondent has, in effect, considered only one other option that is
5 perhaps only nominally an alternative, this analysis fails to consider a reasonable range of
6 alternatives, or even any range at all.

7 The court Grants the petition on this issue.

8 **F. RESPONSE TO PUBLIC COMMENTS**

9 Petitioner next argues that Respondent's response to public comments was insufficient
10 in violation of Guideline 15088(c).

11 The “evaluation and response to public comments is an essential part of the CEQA
12 process.” (Discussion following CEQA Guideline 15088.) The final EIR must include
13 evaluation and responses to all comments received in the public-comment period. PRC
14 section 21091(d)(2)(A). Guideline 15088 governs responses to comments and subdivision (c)
15 governs the substance of such responses. It requires responses to address issues “in detail”
16 and demonstrate “why specific comments and suggestions were not accepted.” Most
17 importantly, perhaps, the responses must explain the reasons for rejecting suggestions with a
18 “good faith, reasoned analysis” and must not rely on “[c]onclusory statements unsupported by
19 factual information.” Guideline 15088(c).

20 **1. Exhaustion of Administrative Remedies**

21 Respondent first contends that Petitioner failed to exhaust administrative remedies on
22 this issue. The court has found, above, that Petitioner exhausted its administrative remedies.
23

24 Petitioner's argument here is collateral and not persuasive. Although Petitioner points
25 out that a few responses may not sufficiently resolve issues, that is of little importance in of
26 itself. What matters are the fundamental defects that have not been cured as discussed above:
27 failure to properly determine GHG inventory, or demonstrate that Respondent could not
28 practically have done more or did not need to do more; ill-defined mitigation measures
lacking enforceable criteria or parameters; and lack of reasonable range of alternatives.

1 The court denies the Petition with respect to the comments..

2 **G. WHETHER RESPONDENTS' ERROR WAS PREJUDICIAL**

3 Respondent contends that even if Petitioner demonstrated error, it was not prejudicial.

4 As noted at the outset, in order for the court to issue a writ of mandate, it must find not only
5 error, i.e., a violation of CEQA, but that error was prejudicial. (*Chaparral Greens v. City of*
6 *Chula Vista* (1996) 50 Cal.App.4th 1134, 1143; see PRC 21168, 21168.5, *Laurel Heights I,*
7 *supra* 47 Cal.3d 392, fn.5; Remy, et al., Guide to the California Environmental Quality Act
8 (10th Ed.1999) Chapter XI(D), p.590.)

9 Respondent's failure to impose meaningful, effectively enforceable mitigation
10 measures, when presenting compliance with the CAP as a way for future projects to avoid any
11 other GHG analysis, is fundamentally and on its face, prejudicial. The failure to present a
12 reasonable range of alternatives or to properly inventory GHG emissions as required are also
13 on, their face, prejudicial because they prevent informed decision making or public review,
14 the very bases of CEQA. (*Sierra Club v. State Bd. of Forestry* (1994) 7 Cal.4th 1215, 1228-
15 1230, 1235-1237 (failure to put critical information in an environmental document was in of
16 itself a prejudicial abuse of discretion partly because it "frustrated the purpose of the public
17 comment provisions"); *Save Cuyama Valley v. County of Santa Barbara* (2013) 213
18 Cal.App.4th 1059, at 1073 ("[a]n error is prejudicial when an agency fails to comply with a
19 mandatory CEQA procedure or when a report omits information and thereby precludes
20 informed decision making); *Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131
21 Cal.App.4th 1170, 1182.; *Schoen v. Dept. of Forestry & Fire Protection* (1997) 58
22 Cal.App.4th 556, 565 ("We cannot overlook a prejudicial error by surmising that the project
23 would have gone forward anyway.")) .)

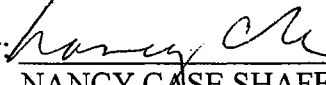
24 Based on the foregoing,
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28

1 NOW, THEREFORE,

2 ORDER

3 1. The Petition for Mandamus is granted as stated above.

4 Dated: 7/20/17

5 By: 
6 NANCY CASE SHAFFER
7 Judge of the Superior Court

8 END NOTES

9 (a) "Tiering" refers to using the analysis of general matters contained in a broader EIR (such
10 as one prepared for a general plan or policy statement) with later EIRs and negative
11 declarations on narrower projects; incorporating by reference the general discussions from the
broader EIR; and concentrating the later EIR or negative declaration solely on the issues
specific to the later project.

12 (b) Agencies are encouraged to tier the environmental analyses which they prepare for
13 separate but related projects including general plans, zoning changes, and development
14 projects. This approach can eliminate repetitive discussions of the same issues and focus the
15 later EIR or negative declaration on the actual issues ripe for decision at each level of
16 environmental review. Tiering is appropriate when the sequence of analysis is from an EIR
17 prepared for a general plan, policy, or program to an EIR or negative declaration for another
18 plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration.
Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable
significant environmental effects of the project and does not justify deferring such analysis to
a later tier EIR or negative declaration. However, the level of detail contained in a first tier
EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.

19 (c) Where a lead agency is using the tiering process in connection with an EIR for a large-
20 scale planning approval, such as a general plan or component thereof (e.g., an area plan or
21 community plan), the development of detailed, site-specific information may not be feasible
22 but can be deferred, in many instances, until such time as the lead agency prepares a future
environmental document in connection with a project of a more limited geographical scale, as
long as deferral does not prevent adequate identification of significant effects of the planning
approval at hand.

23 (d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance
24 consistent with the requirements of this section, any lead agency for a later project pursuant to
or consistent with the program, plan, policy, or ordinance should limit the EIR or negative
25 declaration on the later project to effects which:

- 26 (1) Were not examined as significant effects on the environment in the prior EIR; or
27 (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in
the project, by the imposition of conditions, or other means.

28 (e) Tiering under this section shall be limited to situations where the project is consistent with
the general plan and zoning of the city or county in which the project is located, except that a
project requiring a rezone to achieve or maintain conformity with a general plan may be
subject to tiering.

1
2 (f) A later EIR shall be required when the initial study or other analysis finds that the later
3 project may cause significant effects on the environment that were not adequately addressed
4 in the prior EIR. A negative declaration shall be required when the provisions of Section
5 15070 are met.

6 (1) Where a lead agency determines that a cumulative effect has been adequately addressed in
7 the prior EIR, that effect is not treated as significant for purposes of the later EIR or negative
8 declaration, and need not be discussed in detail.

9 (2) When assessing whether there is a new significant cumulative effect, the lead agency shall
10 consider whether the incremental effects of the project would be considerable when viewed in
11 the context of past, present, and probable future projects. At this point, the question is not
12 whether there is a significant cumulative impact, but whether the effects of the project are
13 cumulatively considerable. For a discussion on how to assess whether project impacts are
14 cumulatively considerable, see Section 15064(i).

15 (3) Significant environmental effects have been "adequately addressed" if the lead agency
16 determines that:

17 (A) they have been mitigated or avoided as a result of the prior environmental impact report
18 and findings adopted in connection with that prior environmental report; or

19 (B) they have been examined at a sufficient level of detail in the prior environmental impact
20 report to enable those effects to be mitigated or avoided by site specific revisions, the
21 imposition of conditions, or by other means in connection with the approval of the later
22 project.

23 (g) When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR
24 and state where a copy of the prior EIR may be examined. The later EIR or negative
25 declaration should state that the lead agency is using the tiering concept and that it is being
26 tiered with the earlier EIR.

27 (h) There are various types of EIRs that may be used in a tiering situation. These include, but
28 are not limited to, the following:

(1) General plan EIR (Section 15166).

(2) Staged EIR (Section 15167).

(3) Program EIR (Section 15168).

(4) Master EIR (Section 15175).

(5) Multiple-family residential development/residential and commercial or retail mixed-use
development (Section 15179.5).

(6) Redevelopment project (Section 15180).

(7) Projects consistent with community plan, general plan, or zoning (Section 15183).

One specific example of a first-tier EIR is a "program" EIR as set forth in Guideline
15168. This details the nature and requirements and uses of such a first-tier EIR, in a manner
similar to that set forth in 15152, and gives another good picture of how they are to be used
and what they must do to be so used in compliance with CEQA. It states, in full,

(a) General. A program EIR is an EIR which may be prepared on a series of actions
that can be characterized as one large project and are related either:

(1) Geographically,

(2) As logical parts in the chain of contemplated actions,

(3) In connection with issuance of rules, regulations, plans, or other general criteria to
govern the conduct of a continuing program, or

1
2 (4) As individual activities carried out under the same authorizing statutory or
3 regulatory authority and having generally similar environmental effects which can be
4 mitigated in similar ways.

(b) Advantages. Use of a program EIR can provide the following advantages. The
5 program EIR can:

6 (1) Provide an occasion for a more exhaustive consideration of effects and alternatives
7 than would be practical in an EIR on an individual action,

8 (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-
9 case analysis,

(3) Avoid duplicative reconsideration of basic policy considerations,

(4) Allow the lead agency to consider broad policy alternatives and program wide
10 mitigation measures at an early time when the agency has greater flexibility to deal with basic
11 problems or cumulative impacts,

(5) Allow reduction in paperwork.

(c) Use With Later Activities. Subsequent activities in the program must be examined
12 in the light of the program EIR to determine whether an additional environmental document
13 must be prepared.

(1) If a later activity would have effects that were not examined in the program EIR, a
14 new initial study would need to be prepared leading to either an EIR or a negative declaration.

(2) If the agency finds that pursuant to Section 15162, no new effects could occur or
15 no new mitigation measures would be required, the agency can approve the activity as being
16 within the scope of the project covered by the program EIR, and no new environmental
17 document would be required.

(3) An agency shall incorporate feasible mitigation measures and alternatives
18 developed in the program EIR into subsequent actions in the program.

(4) Where the subsequent activities involve site specific operations, the agency should
19 use a written checklist or similar device to document the evaluation of the site and the activity
20 to determine whether the environmental effects of the operation were covered in the program
21 EIR.

(5) A program EIR will be most helpful in dealing with subsequent activities if it deals
22 with the effects of the program as specifically and comprehensively as possible. With a good
23 and detailed analysis of the program, many subsequent activities could be found to be within
24 the scope of the project described in the program EIR, and no further environmental
25 documents would be required.

(d) Use With Subsequent EIRS and Negative Declarations. A program EIR can be
26 used to simplify the task of preparing environmental documents on later parts of the program.
27 The program EIR can:

(1) Provide the basis in an initial study for determining whether the later activity may
28 have any significant effects.

(2) Be incorporated by reference to deal with regional influences, secondary effects,
cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.

(3) Focus an EIR on a subsequent project to permit discussion solely of new effects
which had not been considered before.

(e) Notice With Later Activities. When a law other than CEQA requires public notice
when the agency later proposes to carry out or approve an activity within the program and to

1
2 rely on the program EIR for CEQA compliance, the notice for the activity shall include a
statement that:

- 3 (1) This activity is within the scope of the program approved earlier, and
4 (2) The program EIR adequately describes the activity for the purposes of CEQA.

5 ii (a) Lead agencies may analyze and mitigate the significant effects of greenhouse gas
6 emissions at a programmatic level, such as in a general plan, a long range development plan,
7 or a separate plan to reduce greenhouse gas emissions. Later project-specific environmental
8 documents may tier from and/or incorporate by reference that existing programmatic review.
9 Project-specific environmental documents may rely on an EIR containing a programmatic
analysis of greenhouse gas emissions as provided in section 15152 (tiering), 15167 (staged
EIRs) 15168 (program EIRs), 15175-15179.5 (Master EIRs), 15182 (EIRs Prepared for
Specific Plans), and 15183 (EIRs Prepared for General Plans, Community Plans, or Zoning).

10 (b) Plans for the Reduction of Greenhouse Gas Emissions. Public agencies may *choose to*
11 *analyze and mitigate significant greenhouse gas emissions in a plan for the reduction of*
12 *greenhouse gas emissions or similar document.* A plan to reduce greenhouse gas emissions
13 may be used in a cumulative impacts analysis as set forth below. Pursuant to sections
14 15064(h)(3) and 15130(d), a lead agency may determine that a project's incremental
contribution to a cumulative effect is not cumulatively considerable if the project complies
with the requirements in a previously adopted plan or mitigation program under specified
circumstances.

15 (1) *Plan Elements. A plan for the reduction of greenhouse gas emissions should:*

16 (A) Quantify greenhouse gas emissions, both existing and projected over a specified
time period, resulting from activities within a defined geographic area;

17 (B) Establish a level, based on substantial evidence, below which the contribution to
greenhouse gas emissions from activities covered by the plan would not be cumulatively
considerable;

18 (C) Identify and analyze the greenhouse gas emissions resulting from specific actions
or categories of actions anticipated within the geographic area;

19 (D) Specify measures or a group of measures, including performance standards, that
substantial evidence demonstrates, if implemented on a project-by-project basis, would
collectively achieve the specified emissions level;

20 (E) Establish a mechanism to monitor the plan's progress toward achieving the level
and to require amendment if the plan is not achieving specified levels;

21 (F) Be adopted in a public process following environmental review.

22 (2) Use with Later Activities. A plan for the reduction of greenhouse gas emissions,
23 once adopted following certification of an EIR or adoption of an environmental document,
24 may be used in the cumulative impacts analysis of later projects. An environmental document
25 that relies on a greenhouse gas reduction plan for a cumulative impacts analysis must identify
26 those requirements specified in the plan that apply to the project, and, if those requirements
27 are not otherwise binding and enforceable, incorporate those requirements as mitigation
28 measures applicable to the project. If there is substantial evidence that the effects of a
particular project may be cumulatively considerable notwithstanding the project's compliance
with the specified requirements in the plan for the reduction of greenhouse gas emissions, an
EIR must be prepared for the project.

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(c) Special Situations. As provided in Public Resources Code sections 21155.2 and 21159.28, environmental documents for certain residential and mixed use projects, and transit priority projects, as defined in section 21155, that are consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in an applicable sustainable communities strategy or alternative planning strategy need not analyze global warming impacts resulting from cars and light duty trucks.

A lead agency should consider whether such projects may result in greenhouse gas emissions resulting from other sources, however, consistent with these Guidelines.

PROOF OF SERVICE BY MAIL

I certify that I am an employee of the Superior Court of California, County of Sonoma, and that my business address is 600 Administration Drive, Room 107-J, Santa Rosa, California, 95403; that I am not a party to this case; that I am over the age of 18 years; that I am readily familiar with this office's practice for collection and processing of correspondence for mailing with the United States Postal Service; and that on the date shown below I placed a true copy of Order Granting Petition for Writ of Mandate in an envelope, sealed and addressed as shown below, for collection and mailing at Santa Rosa, California, first class, postage fully prepaid, following ordinary business practices.

Date: July 20, 2017

JOSÉ OCTAVIO GUILLÉN
Court Executive Officer

By: Missy Lemley
Missy Lemley, Deputy Clerk

-ADDRESSEES-

✓ JERRY BERNHAUT
708 Gravenstein Hwy N # 407
Sebastopol Ca 95472-2808

BRUCE D GOLDSTEIN
COUNTY COUNSEL
575 Administration Dr Rm 105a
Santa Rosa Ca 95403

Thank you for inviting comments on the scoping plan. I have the following recommendations from NOP https://planning.lacounty.gov/site/climate/wp-content/uploads/2021/12/NOP_CAP-Initial-Study_Final.pdf:

1. **it is critical to include a groundwater sustainability EIR in the climate plan!**

Why? To address the following needs:

Potentially significant impact on our aquifers and on Ballona Wetlands

The proposed reconstructed levees that the Playa Vista development intended to help that development, will in effect allow millions of gallons of critically needed potable water to flow into the ocean.

Currently the Ballona Wetlands (in lay person's terms) serves as a bladder for rainwater capture. As the wetlands get saturated, this natural bladder allows the critically needed stormwater from our once or twice a year storms to replenish the aquifers underlying Santa Monica, Culver City, Beverly Hills, Los Angeles, and unincorporated County areas.

The Ballona Wetlands are a Groundwater Dependent Ecosystem which requires evaluation. Although the County and aforementioned municipalities have formed a Groundwater Sustainable Planning Agency, there has been **NO meaningful evaluation of Ballona as a Groundwater Dependent Ecosystem.**

2. Re 4. **BIOLOGICAL RESOURCES** in respect to the Ballona Wetlands:

P 24 a) **Have a substantial adverse effect**, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)? - YES

P 25 b) Have a substantial adverse effect on any sensitive natural communities (e.g., riparian habitat, coastal sage scrub, oak woodlands, non-jurisdictional wetlands) identified in local or regional plans, policies, regulations or by CDFW or USFWS? - YES

As you address the substantial adverse effect on our biological resources, I recommend you reach out to the expert "*Margot Griswold, Ph.D., a restoration ecologist with over 27 years of experience in habitat restoration. Soils, landscape position, and hydrology, coupled with existing and historic vegetation guide her work in restoration. She participated in consensus planning for plant and wildlife habitat within the Habitat Work Group of the Owens Lake Dust Control Project, Inyo County, California. She is past president of the Society for Ecological Restoration California and the Los Angeles Audubon Society.*" Her integrity and work speaks for itself, especially to counter prevailing private interests, that unchecked will lead to an inhabitable planet for human and all breathing beings existence! *Los Angeles Audubon Society, Western Tanager, Vol. 88 No. 2, Nov-Dec 2021* <https://www.laaudubon.org/blog/2021/10/30/inconsistencies-and-missed-opportunities->

Here are her conclusions regarding the proposed plan for the Ballona wetlands:

“Furthermore, the current proposed plan results in outcomes that are inconsistent with Governor Newsom’s goals for the State.

The proposed {CDFW} plan will:

- Make the wetlands less resilient to sea-level rise, losing existing rare coastal habitats almost from the outset. It is the only project on the Pacific coast that proposes to lower a coastal wetland and open it to full tidal influence and existing sea level, to protect the wetland from future sea level rise.
- There will be a loss of existing species diversity both in terms of the soil ecosystem and the above the ground ecosystem, from the start of the project, including the loss of increasingly rare regional coastal wetland habitats.
- The removal of 3.2 million cubic yards of soil will result in the loss of carbon currently sequestered in the soil (which was not considered in the Final EIR) as well as loss through the massive operations to move that much soil which is acknowledged as an impact in the Final EIR. It is unlikely that the project, as described, can replace the carbon loss through sequestration.”

Dr. Griswold concludes: “How could such an approach have been developed by a resource protection agency {CA Dept of Fish and Wildlife}? As a social ethics analyst for the past 45 years, my conclusion is that either CDFG has not carefully watched and has not corrected the agencies and nonprofits that have managed the development of the project or there is a level of ineptitude prevailing at CDFW.

I trust the LACO CAP will use the Precautionary Principle to address these adverse effects (vs. catering to private interests that will push to prevail for their own benefit, not the public good.

As climate crises escalate, only the committed integrity of YOU who represent Los Angeles County, renowned as the creative capital of the world, can take the lead to give us hope as you model for the world what must happen NOW for meaningful climate remediation!

Our County enacted through the forthcoming Climate Action Plan can serve as the exemplar for every city, state, or nation to use. COP 26 provided reiterations of empty promises. From my analysis, only the power of an entity like Our/LA County can reverse the trajectory to our escalating extinction and resultant hopelessness. If we act with due diligence we can rekindle hope as we work to renew the face of this earth. Shall we?

Dr. Suzanne De Benedittis, PhD social ethics & environmental analyst

February 1, 2022

Please contact me if I can be of further support. Both Supervisor Holly Mitchell and her communications director, Lenee Richards know me on a first name basis as I was one of the lead activists in getting Culver City to end urban drilling. Let’s work together to begin to end the climate crisis. Yes!

From: [Dan Silver](#)
To: [DRP EPS Climate](#)
Subject: Los Angeles County 2045 Climate Action Plan Update, Notice of Preparation
Date: Monday, January 3, 2022 11:06:49 AM
Attachments: [EHL-Draft CAP Comments-4.20.20.pdf](#)

CAUTION: External Email. Proceed Responsibly.

January 3, 2022

Thuy Hua
Los Angeles County Department of Regional
Planning 320 West Temple Street, 13th Floor
Los Angeles, CA 90012

RE: Los Angeles County 2045 Climate Action Plan Update, Notice of Preparation

Dear Ms Hua:

Endangered Habitats League (EHL) appreciates the opportunity to review the NOP for the 2045 CAP. For your reference, EHL is a Southern California regional conservation group.

We have two comments on the scope of the project:

1) For the "Transportation" category, strategies should include reducing vehicle miles traveled (VMT) and GHG emissions by *limiting new development in high-VMT locations*. A variety of land use measures should be evaluated to achieve this goal.

2) For the "Agriculture, Forestry, and Other Land Use" sector, natural (habitat) lands should be added to added as target lands, as they also sequester carbon, particularly in roots and soils.

Comments on the prior iteration of the draft CAP are also enclosed for reference. If convenient, acknowledgement of receipt would also be appreciated.

Thank you for your consideration, and we look forward to working with you.

With best wishes for the New Year,
Dan

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
<https://ehleague.org>



April 20, 2020

VIA ELECTRONIC MAIL

Alejandrina Baldwin
Los Angeles County Department of Regional Planning
County of Los Angeles
320 W. Temple Street
Los Angeles, CA 90012
climate@planning.lacounty.gov

Dear Ms. Baldwin:

RE: Comments on Draft Climate Action Plan, March 2020 Public Review Draft

Endangered Habitats League (EHL) appreciates the opportunity to comment. This review will focus on two sections – Transportation and Agriculture, Forestry, and Other Land Use. These correspond to EHL’s concerns over 1) the relationship of land use to vehicle miles travelled and 2) over ongoing loss of carbon-sequestering habitat lands.

Purpose and use of the CAP

We note that the projects EIR is intended to serve as a programmatic EIR for future projects.

With the adopted CAP, project-specific environmental documents that incorporate applicable CAP actions can “tier off” the environmental document adopted for the CAP to meet project-level CEQA evaluation requirements for GHG emissions. Project-specific environmental documents that incorporate applicable CAP actions, are consistent with the General Plan (development density established by existing zoning, community plan, or General Plan policies), and are consistent with CEQA, can rely on the CAP for quantitative analysis and a separate quantitative analysis will not need to be conducted. A qualitative analysis will still be required to demonstrate compliance with the CAP.

It should be clarified that the CAP and its analyses cannot be used by non-General Plan-consistent projects for purposes of tiering under CEQA. Also, the CAP EIR should develop quantifiable and enforceable mitigation measures for General Plan-consistent projects. These should incorporate the principle of “additionality,” that is, are in addition to what might have occurred absent the measure.

Transportation

The document *correctly* stresses the overarching role of GHG emissions from this sector and the need to markedly reduce VMTs. Such reduction has been clearly stated by CARB as essential to meeting the state’s targets.¹ The extent of called-for reductions in VMT appear adequate. *However, the ultimate role of the measures the draft proposes to attain such reductions is unclear, specifically, which are aspirational planning endeavors and which are mitigation measures under CEQA for GHG reduction.*

A sound approach starts with an understanding of the role the County *must* play if land use planning is to reduce carbon emissions on a *regional* basis. That proper role is to *limit* high-VMT development in the *unincorporated* area so that growth is *directed into* the incorporated municipalities where low-VMT development is far more achievable. While the draft CAP does include this vital concept, it is not fleshed out with any substance.

The County will focus on increasing density near transit and not in transit-inaccessible areas while limiting displacement of existing residents. (p. 49)

Instead, the draft CAP *over-relies* on an aggressive program of transit-oriented development, or TOD, in the unincorporated area.

Strategy 2: Promote transit oriented communities

T2: Develop community plans that will increase the percentage of residents who could live and work within the same community, and that could decrease the vehicle miles traveled.

EHL strongly supports a strategy of building low-VMT development, but it must be an action that complements—and *does not substitute for*—the unincorporated area’s *essential* goal of reducing its own new high-VMT development.

Also, what is the true potential for TOD in the *unincorporated* area? Where are the community plans which will be revised? Where is the transit network to support TOD in these locations? Very large GHG reduction benefits are assumed to derive from TOD implementation,² yet there is no *analytical chain* in the draft CAP that links *realistic* attainment of TOD in the unincorporated area to the assumptions in Table 11.

¹ “California *cannot* meet its climate goals without curbing growth in single-occupancy vehicle activity.” Air Resources Board, 2018 Progress Report, California’s Sustainable Communities and Climate Protection Act (2018) p. 28 (emphasis added).

² Table 11 (p. 113)

- VMT decrease from 17.8 miles per capita in 2015 to 10 miles per capita in 2045 because of new housing development in HQTAs and reduction in single occupancy trips (see Strategy 3).

*The vast majority of TOD potential lies within cities, and given the finite financial resources that the region has at its disposal to expand transit, inevitable prioritization will direct this investment to prime locations within cities. Also, the well-known obstacles to implementation of TOD are greater in the unincorporated area in comparison with the municipalities.*³

The draft CAP has not demonstrated that TOD adoption in the unincorporated area can achieve the mobility shifts and vehicle-miles-traveled reductions assumed. It is better considered as achievable in some part. TOD's role as an enforceable *mitigation measure* for GHG emissions under CEQA is therefore limited, and would need coupling with performance standards. This is in contrast to tangible steps like investment in transit facilities.

Rather, what the County can do *unequivocally and with absolute certainty* is to use its land use authority to *disallow* high-VMT sprawl outside of cities and thereby direct growth into cities. *How can single occupancy vehicle trip reduction goals be met and shift to transit modes occur if the County continues to sprawl with high-VMT development?* On the other hand, if the unincorporated area curtails high-VMT growth, then developers will turn to TOD in the cities—a shift which otherwise will not happen due to the higher and easier profits in sprawl. Unless the County stops approving high-VMT development, its efforts to foster TOD—whether inside or outside cities—will be undermined.

Reduction of high-VMT development can be achieved in at least three ways:

-
- As a result of new housing built within 1/2 mile of high frequency transit, it is estimated that population residing within HQTAs increases from 0.3 million in 2015 to 0.6 million by 2045.
 - Daily VMT by individuals residing in HQTAs is 25 percent lower than those in non-HQTA areas.
 - 50 percent of all trips by 2045 are taken by public transit and other modes including biking, walking, and micromobility transit. This shift in mode share reduces the dependence on light duty vehicles, thus decreasing single occupancy trips and GHG emissions.
 - Mode shift increases trips and utilization of public transit (rail and bus) and ride sharing services, increasing public transit mode share from 6 percent in 2015 to 22 percent by 2045.

³ Due to the baseline of a dispersed urban form, complete and convenient transit networks hard to attain. Getting people out of cars and into buses has not succeeded to date, as evidenced by declining transit ridership. There are also numerous poorly controllable contingencies in building and operating TOD, from local opposition to rezoning at higher density (e.g., in single-family neighborhoods close to transit corridors) to unappealing conditions in transit vehicles. Further, paradoxically, if developers are incentivized with market-rate housing—even multifamily—near transit stops, gentrification will push out the core of transit ridership, the transit-dependent.

1. Curtailing or stopping altogether *amendments* to the General Plan that produce high VMT per capita, e.g., by a GPA initiation “filter.”
2. Adopting a mandatory transfer of development rights (TDR) program that transfers existing General Plan density in high-VMT locations to low-VMT locations either in the unincorporated area or within cities.
3. Adopting a substantial VMT fee for General Plan-consistent projects, which, if properly set, will incentivize lower-VMT development and discourage the type of development which undermines the CAP.

The CPA and its EIR should include these and other mechanisms as mitigation measures for projects whose GHG emissions—including vehicle-miles-traveled—cannot be mitigated on-site. These measure would provide more substance to Strategy 3:

Strategy 3: Reduce single occupancy vehicle trips (p. 51)

Agriculture, Forestry and Other Land Use (AFOLU)

The strategies for Agriculture, Forestry and Other Land Use are positive in that the benefits of habitat land conservation are acknowledged.

Forests, chaparral shrublands, and wetlands serve as carbon sinks that can sequester carbon dioxide that result from human activity. When these natural and working lands are converted to residential and other urbanized uses, that stored carbon dioxide is released into the atmosphere. Conserving and restoring these lands keeps carbon in the ground and provides a multitude of benefits from maintaining biodiversity in Significant Ecological Areas (SEA) to preserving the character of the unincorporated County’s rural areas. (p. 87)

There is also suggested action:

Support the preservation of agricultural and working lands, including rangelands, and restore forest lands, by limiting the conversion of these lands to residential or other uses through tools such as the creation of agricultural easements, particularly within high climate-hazard areas and SEAs.

Yet the program for AFOLU remains incomplete in several ways. First, the carbon benefits of natural lands preservation are not limited to *sequestration* as the document implies, but extend to the “avoided conversion” of natural land to GHG-intensive uses. This benefit was been quantified and certified by CARB in its Sustainable Agricultural Lands Conservation (SALC) Program.⁴ Based on underlying zoning, CARB

⁴ See <http://www.sgc.ca.gov/programs/salc/resources/>

http://www.sgc.ca.gov/programs/salc/docs/20190514-SALC_FactSheet.pdf

https://www.conservation.ca.gov/dlrp/grant-programs/SALCP/Documents/2018-19%20Application%20Materials/FINAL%2018-19_SALCP%20Guidelines.pdf

has off-the-shelf metrics and methods for calculating the GHG benefit of avoided conversion.

The CAP EIR should incorporate the SALC avoided-conversion benefit into a mitigation measure for GHG emissions for new development. In other words, projects can mitigate those unavoidable GHG impacts which cannot be mitigated on-site, including VMTs, by purchasing a property interest in habitat (or farmland) that prevents conversion to developed uses. Such a measure could be implemented via the VMT fee discussed above.

The AFOLU section should also be improved in the follow ways:

1. There should be more specificity given to our prevalent vegetation types, such as coastal sage scrub, desert scrub, and oak and Joshua woodlands. It should also be noted that these lands sequester carbon in extensive root systems which are immune to wildfires which release carbon stored above ground.
2. Acreage targets should be set, such as for Significant Ecological Area (SEA) protection.
3. Mechanisms such as TDR should be established, as well as new funding sources.
4. The CAP EIR should establish a specific mitigation pathways—such as VMT mitigation banks and the VMT fee described above—whereby new development can mitigate for VMTs and other GHG impacts by preserving land.

Carbon offsets

The use of carbon offsets is proposed as a mitigation option when not enough can be done on-site:

If residual emissions cannot be eliminated through new technologies, or be reduced over time in response to changes in community-wide activities, the County will consider the purchase of certified carbon credits (or offsets) to achieve carbon neutrality by 2045. Purchased offsets will be registered in a carbon offsets registry approved by the State of California and/or the U.S. Government for that purpose. Offsets will be prioritized according to proximity to Los Angeles County with a preference for local offsets when available, followed by offsets within California.

However, offsets are *highly* problematic. Studies have shown them to be unreliable at best and fraudulent at worst, often without demonstrated additionality and enforceability.⁵

⁵ See https://ec.europa.eu/clima/sites/clima/files/ets/docs/clean_dev_mechanism_en.pdf
<https://insideclimatenews.org/news/19042017/carbon-emissions-credits-paris-climate-agreement>
<https://www.technologyreview.com/s/614216/whoops-californias-carbon-offsets-program-could-extend-the-life-of-coal-mines/>

Therefore, if used at all, they should be local, verifiable, and enforceable. Limiting them to California is a step in the right direction. Also, “mitigation” is a preferable term to “offsets.”

Importantly, the requirement that offsets be from a California-approved registry is *in itself* meaningless and *not* analogous to how the State Cap-and-Trade program uses offsets to verifiably attain reductions.

Purchased offsets will be registered in a carbon offsets registry approved by the State of California and/or the U.S. Government for that purpose. (p. 37)

CARB does not accept credits supplied by a certified registry *unless* it has independently verified their protocols for efficacy, additionality, enforceability, etc. *Simply being listed on an approved registry guarantees none of the above.*⁶

Miscellaneous comments

Given the currently low rates of transition to ZEVs, are the CAP’s projected future rates of use realistic?

Zero-emission vehicle (ZEV) adoption rate: 40 percent of all sales by 2030 and 100 percent of all sales by 2050.

The Antelope Valley section includes the following proposed action (p. 128) but its intent is unclear.

Actions targeting zero carbon energy in wildfire-prone areas

However, wildfires release enormous amounts of stored carbon into the atmosphere. *The CAP should therefore include measures to reduce expansion of the urban-wildland interface, which is the dominant source of fire ignitions.* Development at the WUI is also typically high-VMT in nature, so this strategy has synergistic co-benefits.

<https://www.technologyreview.com/s/613326/californias-cap-and-trade-program-may-vastly-overestimate-emissions-cuts/>

⁶ As an example, the CAPCOA registry does not warrant that listed credits satisfy state standards. On the contrary, CAPCOA has explicitly disclaimed “any representations, warranties or guarantees of any kind as to the use or applicability of any GHG credit listed on the CAPCOA GHG Rx for ... compliance with [CEQA], or for any other use.” Rather, “if a GHG credit listed on the CAPCOA GHG Rx is proposed to be used as part of a CEQA mitigation measure, the respective CEQA lead agency ... is responsible for determining if the use of such GHG credit is appropriate (as mitigation).... The CAPCOA GHG Rx only lists available GHG credits so that interested parties may make private inquiries into obtaining those GHG credits. CAPCOA does not offer any other services beyond this listing service.”

In conclusion, the draft CAP sets good goals but should be improved to achieve implementation and to function as a programmatic EIR for future projects mitigation under CEQA. EHL would look forward to collaborating as the CAP evolves.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver". The signature is fluid and cursive, with a large initial "D" and "S".

Dan Silver
Executive Director

From: patriciamcpherson1@verizon.net
To: [DRP EPS Climate](#)
Cc: makeccsafe@gmail.com
Subject: 1- Grassroots Coalition submission of Comments LACO CLIMATE ACTION PLAN
Date: Friday, January 28, 2022 9:12:23 AM
Attachments: [Screen Shot 2022-01-28 at 8.54.11 AM.png](#)
[Screen Shot 2021-06-25 at 1.10.49 PM.png](#)
[Screen Shot 2022-01-28 at 8.54.11 AM.png](#)

CAUTION: External Email. Proceed Responsibly.



Patricia McPherson President
Jeanette@SaveBallona.org (310) 721-3512

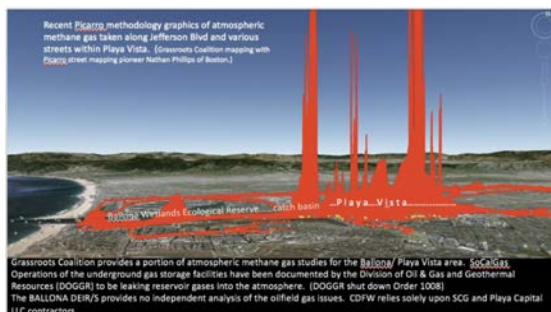
Grassroots Coalition, in review of the planning strategies does not see anything pertinent to the cessation of ongoing outgassing via gas mitigation devices that expel the oilfield gas contents into the atmosphere. Large quantities of oilfield gases are being channeled through collection devices and vented into the atmosphere rather than utilizing available SCRUBBER TECHNIQUES to scrub the outgassing of potent climate change gases which would remove the gases from venting into the atmosphere and adding to global warming.

The Picarro image below is one example of outgassing occurring via Playa Vista venting of oilfield gases via piping that simply allows gathering and transfer of oilfield gases to the surface and atmosphere. Scrubbers can and should be utilized to remove these harmful greenhouse gases from entering the atmosphere and contributing to global warming as well as stopping the conversion of these funneled gases from mixing with sunlight to become other harmful gases.

Poorly abandoned, leaky oil/gas wells need to also be properly reabandoned to prevent their outgassing of oilfield gases into the atmosphere. University City Syndicate is one such leaky well shown as outgassing voluminous amount of greenhouse gases into the atmosphere in the Picarro gas imaging attached herein.

Please include acknowledgement of and attention to these issues as contributing to greenhouse gas emissions and global warming that can and should be ended.

Thank you,



Patricia McPherson, Grassroots Coalition

Recent Picarro methodology graphics of atmospheric methane gas taken along Jefferson Blvd and various streets within Playa Vista. (Grassroots Coalition mapping with Picarro street mapping pioneer Nathan Phillips of Boston.)



Ballona Wetlands Ecological Reserve.....catch basin ...Playa Vista.....

Grassroots Coalition provides a portion of atmospheric methane gas studies for the Ballona/ Playa Vista area. SoCalGas Operations of the underground gas storage facilities have been documented by the Division of Oil & Gas and Geothermal Resources (DOGGR) to be leaking reservoir gases into the atmosphere. (DOGGR shut down Order 1008)
The BALLONA DEIR/S provides no independent analysis of the oilfield gas issues. CDFW relies solely upon SCG and Playa Capital LLC contractors.

From: [Robert Haw](#)
To: [DRP_EPS Climate](#)
Subject: EIR Public Review - 2045 CAP
Date: Sunday, January 30, 2022 3:04:18 PM

CAUTION: External Email. Proceed Responsibly.

Dear Ma'am/Sir:

Comment on LA County 2045 Draft Climate Action Plan

Building Energy & Water

Strategy 5

Measure E3: “Standardize All-Electric New Development”
and

Strategy 7

Measure E7: “Improve Energy Efficiency of Existing Buildings”

I applaud your multiple strategies for reducing GHG emissions, *e.g.* transitioning both new and existing buildings to all-electric modes. However the CAP needs to be mindful of operation costs of all-electric buildings. Natural gas molecules are cheaper than electrons, and that disparity will likely remain for the foreseeable future. Thus it is crucial to reduce electricity demand as much as possible in order to forestall user-complaints about high power bills.

Building shells (envelopes) need to be improved significantly in parallel with building electrification. Reducing heat transmission through building walls, roofs, and windows is necessary so as to maintain stable interior temperatures while minimizing demand for heating and/or cooling. That means super-insulating walls and upgrading glazing with higher performing windows. Setting robust goals like this will tamp-down power bills of residents and occupants. Otherwise bills will soar as outdoor temperatures rise. This is the way to enhance energy efficiency in buildings and reduce GHG emissions — and do it in a passive way.

Several organizations exist for promoting the design of high performance buildings (both new construction and refurbishments). Two of the best known with high standards are:

1. Passive House Institute (begun in Germany, but now very popular world-wide):

<https://passivehouse.com/index.html>

Also Passive House California: passivehousecal.org

1. LEEDv4.1 Platinum (their highest level) usgbc.org/leed

(LEED also offers certification for neighborhood developments.)

A procedure to actually accomplish these kinds of building upgrades at scale is outlined in the following Department of Energy report:

<https://www.nrel.gov/docs/fy20osti/76142.pdf>

In summary, to achieve high energy efficiencies in the built environment, add rigorous building envelope guidelines to the 2045 Climate Action Plan. Environmental effects can be mitigated by minimizing upfront material carbon emissions of the construction materials *e.g.* insulate with cellulose, not spray foam.

Sincerely,
Robert Haw

From: [Rosalind Helfand](#)
To: [DRP EPS Climate](#)
Subject: LA County CAP EIR Notice Comments
Date: Tuesday, February 1, 2022 4:58:02 PM

CAUTION: External Email. Proceed Responsibly.

Greetings,

Please accept the following comments regarding the LA County CAP EIR Notice of Preparation and Initial Study:

- * The Initial Study discussion of greenhouse gas emissions is somewhat confusing as it indicates a comprehensive review of emissions but then heavily focuses on carbon. To be relevant and adaptable, the county will need to very clearly show how it is addressing multiple types of greenhouse gases, including methane, nitrous oxide, etc.
- * Despite discussion of expanding tree canopy and green spaces, the discussion of increasing development density/infill needs to more specifically include review of how to also meet goals to increase health and decrease pollution including increasing urban forests, localized community farming, more parks, rooftop solar, etc. It should also be emphasized that infill should not lead to increasing heat island effects or reduce green space.
- * Forests are mentioned regarding protection and restoration, but protection and restoration of other ecosystem types need to be discussed in greater detail, especially chaparral, woodlands, riparian habitat, canyon corridors, wetlands, desert, and grasslands.
- * Potential impacts on biodiversity, ecosystems and species is of deep concern. Ecosystems in LA County are already strained to a near breaking point. The utmost care should be taken to ensure that there is zero impact on vulnerable species, key ecosystems like oak woodlands, and habitat of concern for migratory species.
- * Further review should be taken to, as per the point above, ensure that infrastructure designed to combat climate change does not harm species and ecosystems, and that nature-based solutions are of primary importance, including solutions that align with the state's Pathways to 30x30.

Thank you,

Rosalind Helfand
PAJE Consulting

310-869-5749
Rosalind@PAJEConsulting.com

Address:
1956 N Beachwood Dr, Apt 8
Los Angeles, CA 90068

--

Rosalind Helfand
Environmental & Social Policy Advisor
[PAJE Consulting](#)

Thuy Hua, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
Via email: climate@planning.lacounty.gov

Dear Ms. Hua,

Comments on NOP and Initial Study for Draft 2045 Climate Action Plan

I strongly support the County's efforts to develop and adopt an enforceable Climate Action Plan that meets or exceeds the State's target of carbon neutrality by 2045. However, I am dismayed that the NOP and Initial Study attempt to narrow the scope of the EIR analyses without defining the measures, actions, performance standards and timelines that are inherent in the CAP. The measures listed in the Initial Study do not include mention of any local electricity generation including solar roofs, community solar or microgrids. There are no measures that indicate that public charging stations for electric vehicles will be included in unincorporated areas of the County. Further, the Initial Study states that new development will be required to meet a net zero water standard, but this isn't stated in the measures or identified as an existing policy. As a result, I request that the revised draft CAP be published prior to or simultaneously with the Draft EIR and that the EIR analyze a fully disclosed description of the CAP.

The County appears to be proposing to meet the State target of carbon neutrality by 2045. Alternatives in the EIR should include more aggressive timelines for carbon neutrality so that the public and decisionmakers can evaluate the feasibility of moving more quickly. Alternatives should also address the feasibility of zero emissions for many sectors, rather than carbon neutrality which implies that purchasing carbon credits will be used to achieve the target.

The Initial Study indicates that impacts to gas and electric utilities will not be addressed in the EIR. I question the analysis that led to this conclusion, and request that these impacts be addressed in the EIR. If the County is going to propose to electrify buildings and transportation instead of relying on natural gas and gasoline, it is likely that there will be an effect on electricity infrastructure. The EIR should evaluate the degree to which local solar electric generation and energy efficiency measures can offset increased demands for electricity. The net effects on local and regional electricity distribution and transmission need to be identified. Cumulative effects on electrical infrastructure throughout Los Angeles County should also be evaluated. It is important to determine when and where upgrades to electrical infrastructure will be needed as mitigation for electrification.

The EIR should also address the impacts of electrification on natural gas and gasoline station infrastructure. Changes to land use, phaseout of underground fuel storage tanks, need for cleanup of fuel leaks by responsible parties should be identified along with effects on air and groundwater quality. Phaseout of oil and gas operations in the County also needs to have

timeline and strategy to avoid adverse effects and limit public assumption of oil well capping and remediation of industrial pollution.

Thank you for the opportunity to provide input to this important scoping process for review of environmental effects of the 2045 CAP.

Sincerely,

Kathleen Kunysz
32-Year Resident of Altadena



Thuy Hua, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
Via email: climate@planning.lacounty.gov

Dear Ms. Hua,

Comments on NOP and Initial Study for Draft 2045 Climate Action Plan

The League of Women Voters of Los Angeles County supports updating the 2020 Climate Action Plan (CAP).

The proposed 2045 CAP uses new Greenhouse Gas (GHG) emissions inventory data, new emissions forecasts and revises measures to reduce GHG emissions. All of these elements are important and needed. In general, LWV US and California support conservation of energy, water and biodiversity; GHG and Vehicle Miles Traveled (VMT) reduction; climate change adaptation; and meeting the basic needs of all people, particularly the vulnerable.

In addition to the areas specified for focus in the Programmatic Environmental Impact Report (PEIR), we are requesting that the PEIR evaluate the impact of the 2045 emission reduction strategies on the following areas, with continued attention to environmental justice and equity:

- Housing
 - Support policies to provide a decent home and a suitable living environment for every American family.
 - Support equal opportunity in housing.
- Utilities
 - Ensure the reliability of energy resources and protections of the environment and public health and safety.
- Climate Change
 - Promote a clean, low-carbon energy economy that is sustainable, including all forms of renewable energy and transportation infrastructure.
 - Promote energy conservation and efficiency in transportation, buildings, and infrastructure, including energy efficiency standards and land use policies that reduce vehicle miles traveled.

We read the Notice of Preparation (NOP) and Initial Study and do not see the detail needed for the evaluation and elimination of EIR study areas. We request that the EIR fully describe the proposed greenhouse gas reduction measures including specific actions, performance standards and timelines.

In particular, we request that the EIR evaluate the effect of electrification of energy used in buildings and vehicles upon utility infrastructure in the unincorporated areas and cumulatively throughout Los Angeles County. The EIR should identify the effect of local solar energy generation and microgrids and energy efficiency measures to offset increases in electrical energy demands and effects on regional electrical energy transmission infrastructure. The EIR should also evaluate the effect of reduced demand for natural gas and gasoline stations and increased demand for electric vehicle charging and their effects on land use, transportation patterns and air quality. The EIR should also have a plan to seal oil and gas wells, and to decommission refineries and gas pipelines.

We understand that the Department of Regional Planning is currently revising the Draft 2045 CAP and including more detailed descriptions of mitigation projects. However, those detailed projects should be fully reviewed for possible impacts and be subject to public comment within the EIR process.

Sincerely,

A handwritten signature in black ink, appearing to read "Fatima Malik", is centered on a light gray rectangular background.

Fatima Malik
President
League of Women Voters of Los Angeles County

NATIVE AMERICAN HERITAGE COMMISSION

December 30, 2021

Thuy Hua
 Los Angeles Department of Regional Planning
 320 W. Temple Street 13th Floor
 Los Angeles, CA 90012



Re: 2021120568, Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP) Project, Los Angeles County

Dear Ms. Hua:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



CHAIRPERSON
 Laura Miranda
 Luiseño

VICE CHAIRPERSON
 Reginald Pagaling
 Chumash

PARLIAMENTARIAN
 Russell Attebery
 Karuk

COMMISSIONER
 William Mungary
 Paiute/White Mountain
 Apache

COMMISSIONER
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 Ohlone-Costanoan

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 Yokayo Pomo, Yuki,
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NAHC.ca.gov

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a.** A brief description of the project.
 - b.** The lead agency contact information.
 - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d.** A “California Native American tribe” is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe’s Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a.** For purposes of AB 52, “consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a.** Alternatives to the project.
 - b.** Recommended mitigation measures.
 - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a.** Type of environmental review necessary.
 - b.** Significance of the tribal cultural resources.
 - c.** Significance of the project’s impacts on tribal cultural resources.
 - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency’s environmental document shall discuss both of the following:
 - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

- 1. Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code §65352.3 (a)(2)).
- 2. No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
- 3. Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
- 4. Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a.** The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b.** Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

- 1.** Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a.** If part or all of the APE has been previously surveyed for cultural resources.
 - b.** If any known cultural resources have already been recorded on or adjacent to the APE.
 - c.** If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d.** If a survey is required to determine whether previously unrecorded cultural resources are present.
- 2.** If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a.** The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b.** The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3.** Contact the NAHC for:
- a.** A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b.** A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4.** Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
- a.** Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c.** Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Cultural Resources Analyst

cc: State Clearinghouse

From: [Ryan Nordness](#)
To: [DRP EPS Climate](#)
Subject: DEIR Los Angeles County 2045 Climate Action Plan (Draft 2045 CAP)
Date: Tuesday, February 1, 2022 2:28:36 PM

CAUTION: External Email. Proceed Responsibly.

Hello Thuy Hua,

Thank you for inviting San Manuel into the discussion over unincorporated Los Angeles county's management of greenhouse gas emissions. We have no overt concerns concerning the management of the emissions created by community activities, unless however, this plan would include the development of carbon reduction projects within tribal territory. These projects could include community parks, forests/preserves, carbon capture plants, etc.. Additionally, the tribe is interested in any educational, land acknowledgement, or interpretive opportunities that would result in this DEIR. Once again, San manuel thanks you for this opportunity to comment on the 2045 Climate Action Plan.

Respectfully,
Ryan Nordness

Ryan Nordness

Cultural Resource Analyst

Ryan.Nordness@sanmanuel-nsn.gov

O:(909) 864-8933 Ext 50-2022

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26569 Community Center Dr Highland, California 92346





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February 1, 2022

Ms. Thuy Hua, Supervising Regional Planner
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, California 90012
E-mail: climate@planning.lacounty.gov

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County 2045 Climate Action Plan [SCAG NO. IGR10549]

Dear Ms. Hua,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County 2045 Climate Action Plan (“proposed project”) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG’s adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS). SCAG’s feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and align with RTP/SCS policies. Finally, SCAG is also the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Los Angeles County 2045 Climate Action Plan in Los Angeles County. The proposed project consists of a General Plan Amendment to replace the Los Angeles County Community Climate Action Plan (CAP). Revisions include an updated GHG emissions inventory; new emissions forecasts; new GHG emissions targets; a revised suite of GHG reduction strategies, measures, and actions; a technical modeling; consideration of environmental justice and equity concern; and a new development review consistency checklist to allow projects to streamline CEQA compliance for by using the CAP.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Intergovernmental Review (IGR) Program, attn.: Anita Au, Senior Regional Planner, at (213) 236-1874 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the 2020 RTP/SCS (Connect SoCal) for the purpose of determining consistency for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN [SCAG NO. IGR10549]**

CONSISTENCY WITH CONNECT SOCIAL

SCAG provides informational resources to facilitate the consistency of the proposed project with the adopted 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS or Connect SoCal). For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with Connect SoCal.

CONNECT SOCIAL GOALS

The SCAG Regional Council fully adopted [Connect SoCal](#) in September 2020. Connect SoCal, also known as the 2020 – 2045 RTP/SCS, builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The goals included in Connect SoCal may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project. Among the relevant goals of Connect SoCal are the following:

SCAG CONNECT SOCIAL GOALS	
Goal #1:	<i>Encourage regional economic prosperity and global competitiveness</i>
Goal #2:	<i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>
Goal #3:	<i>Enhance the preservation, security, and resilience of the regional transportation system</i>
Goal #4:	<i>Increase person and goods movement and travel choices within the transportation system</i>
Goal #5:	<i>Reduce greenhouse gas emissions and improve air quality</i>
Goal #6:	<i>Support healthy and equitable communities</i>
Goal #7:	<i>Adapt to a changing climate and support an integrated regional development pattern and transportation network</i>
Goal #8:	<i>Leverage new transportation technologies and data-driven solutions that result in more efficient travel</i>
Goal #9:	<i>Encourage development of diverse housing types in areas that are supported by multiple transportation options</i>
Goal #10:	<i>Promote conservation of natural and agricultural lands and restoration of habitats</i>

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCIAL GOALS	
Goal	Analysis
Goal #1: <i>Encourage regional economic prosperity and global competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
Goal #2: <i>Improve mobility, accessibility, reliability and travel safety for people and goods</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

Connect SoCal Strategies

To achieve the goals of Connect SoCal, a wide range of land use and transportation strategies are included in the accompanying twenty (20) technical reports. Of particular note are multiple strategies included in Chapter 3 of Connect SoCal intended to support implementation of the regional Sustainable Communities Strategy (SCS) framed within the context of focusing growth near destinations and mobility options; promoting diverse housing choices; leveraging technology innovations; supporting implementation of sustainability policies; and promoting a Green Region. To view Connect SoCal and the accompanying technical reports, please visit the [Connect SoCal webpage](#). Connect SoCal builds upon the progress from previous RTP/SCS cycles and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that helps the SCAG region strive towards a more sustainable region, while meeting statutory requirements pertinent to RTP/SCSs. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

SCAG staff would like to call your attention to resources available from SCAG’s [Regional Climate Adaptation Framework](#) including the [Southern California Climate Adaptation Planning Guide](#), [Communication and Outreach Toolkit](#), [Library of Model Policies](#), and [SB 379 Compliance Curriculum for Local Jurisdictions](#).

DEMOGRAPHICS AND GROWTH FORECASTS

A key, formative step in projecting future population, households, and employment through 2045 for Connect SoCal was the generation of a forecast of regional and county level growth in collaboration with expert demographers and economists on Southern California. From there, jurisdictional level forecasts were ground-truthed by subregions and local agencies, which helped SCAG identify opportunities and barriers to future development. This forecast helps the region understand, in a very general sense, where we are expected to grow, and allows SCAG to focus attention on areas that are experiencing change and may have increased transportation needs. After a year-long engagement effort with all 197 jurisdictions one-on-one, 82 percent of SCAG’s 197 jurisdictions provided feedback on the forecast of future growth for Connect SoCal. SCAG also sought feedback on potential sustainable growth strategies from a broad range of stakeholder groups – including local jurisdictions, county transportation commissions, other partner agencies, industry groups, community-based organizations, and the general public. Connect SoCal utilizes a bottom-up approach in that total projected growth for each jurisdiction reflects feedback received from jurisdiction staff, including city managers, community development/planning directors, and local staff. Growth at the neighborhood level (i.e., transportation analysis zone (TAZ) reflects entitled projects and adheres to current general and specific plan maximum densities as conveyed by jurisdictions (except in cases where entitled projects and development agreements exceed these capacities as calculated by SCAG). Neighborhood level growth projections also feature strategies that help to reduce greenhouse gas emissions (GHG) from automobiles and light trucks to achieve Southern California’s GHG reduction target, approved by the California Air Resources Board (CARB) in accordance

with state planning law. Connect SoCal’s Forecasted Development Pattern is utilized for long range modeling purposes and does not supersede actions taken by elected bodies on future development, including entitlements and development agreements. SCAG does not have the authority to implement the plan -- neither through decisions about what type of development is built where, nor what transportation projects are ultimately built, as Connect SoCal is adopted at the jurisdictional level. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2016 and 2045, please refer to the [Connect SoCal Demographics and Growth Forecast Technical Report](#). The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts				Adopted County of Los Angeles Forecasts			
	Year 2020	Year 2030	Year 2035	Year 2045	Year 2020	Year 2030	Year 2035	Year 2045
Population	19,517,731	20,821,171	21,443,006	22,503,899	10,407,326	10,899,849	11,173,987	11,673,937
Households	6,333,458	6,902,821	7,170,110	7,633,451	3,471,759	3,749,346	3,884,871	4,119,336
Employment	8,695,427	9,303,627	9,566,384	10,048,822	4,838,458	5,059,615	5,171,618	5,382,235

MITIGATION MEASURES

SCAG staff recommends that you review the [Final Program Environmental Impact Report](#) (Final PEIR) for Connect SoCal for guidance, as appropriate. SCAG’s Regional Council certified the PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on May 7, 2020 and also adopted a PEIR Addendum and amended the MMRP on September 3, 2020 (please see the [PEIR webpage](#) and scroll to the bottom of the page for the PEIR Addendum). The PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

From: [Sheila Swift](#)
To: [DRP EPS Climate](#)
Subject: comment and question CAP/Air quality
Date: Thursday, January 13, 2022 10:09:08 AM

CAUTION: External Email. Proceed Responsibly.

To Alejandrina Baldwin

Dear Alexandrina,

I watched the recording of your last webinar and I am planning on attending the meeting this afternoon. I am a member of a neighborhood group that has been working for several years on local air quality issues in Altadena and Pasadena. One of our main points of focus is on gas-powered lawn/yard maintenance equipment, specifically the use of gas-powered mowers and blowers. We are aware that several cities in the Los Angeles area have successfully banned the use of such gas-powered lawn equipment while providing financial support to yard maintenance companies who have to transition to electric and solar equipment.

We would very much like to see this instituted across all of Los Angeles County particularly as reports indicate that carbon emissions from this type of equipment are set to exceed emissions from cars this year. People have been talking about emissions from this type of equipment for well over two decades now and yet the equipment is still in wide use almost everywhere, which is extremely frustrating.

It seems to us that this type of equipment, in the face of our looming and urgent climate crisis, and the numerous alternative, non-polluting alternatives available for yard maintenance measures, should be phased within the year, rather than within the decade. There is plentiful data and public interest that support making this change.

We would like to hear from your vantage point today why this is taking so long and what, specifically, are the current plans to address the urgent issue of gas-powered yard maintenance equipment.

Thank you for the work you do for us and future generations!

Sheila Swift
729 N Michigan Ave.
Pasadena, CA 91104

Kathleen Trinity
4343 Fairlane St.
Acton, CA, 93510
ktrinity46@gmail.com
1-30-2022

Thuy Hua
Los Angeles County Department of Regional Planning
320 West Temple Street, 13th Floor
Los Angeles, CA 90012
Email : thua@planning.lacounty.gov

Re Comment on Los Angeles County Climate Action Plant (CAP) December 2021 Draft 2045

By Kathleen Trinity

Acton, C A.

While it is the responsibility of Los Angeles County is addressing Climate Change in our area, several parts of the Climate Action Plan, Draft 2045, December 2021, are not well thought out when addressing the unincorporated areas of the north east County. I specifically object to Element 14 as applied to Acton, CA. CAP Element 14 Population and Housing, section a, is judged as “less than significant impact,” p. 59 of the NOP. Since Metrolink has a train station at the foot of the Angeles National Forest, CAP will attract high density housing within the vicinity of the Metrolink Station. This is a very poor idea for the following reasons:

1. Dense housing in that area would compromise the safety and integrity of the wildlife and its resources in the adjacent hills, mountains, and riparian areas. Density of housing also reduces contiguous areas of open space necessary for wildlife corridors. Traffic, noise, the increased risk of fire, trash and toxins come with dense population. The proximity of dense housing development will disturb and stress burrowing animals, deer, birds, mountain lions, bobcats, and small mammals in the area. More vermin are likely to congregate in and around dense housing units with the inevitable use of toxic materials even if they are banned. More raptors are likely to hunt vermin in and around such an area, thus threatening smaller birds and their nests as well as migrating birds.
2. The more stressed water supply in Acton and the AV has now become severe. Some wells have gone dry and drought is predicted to continue well into the future. Dense housing in Acton will further stress the water supply. The water supply in Action is a moving source in much of the area, not an aquifer. Therefore, transfer of water to or from Acton will not ameliorate the problem.
3. Wildfires have not only destroyed densely spaced housing developments, but densely populated housing developments in or at the interface of wilderness. The Paradise Fire in Northern California created such intensity of heat and rapid movement that many residents became trapped within its rapidly changing perimeter. The study, “The Spatial and Temporal Pattern of Wildfires in California 2000 to 2019,” Journal Nature, November 2021 ([nature.com/articles/841598-021-88131-4](https://www.nature.com/articles/841598-021-88131-4)), finds

that “the greater the density of housing and population (in these areas), the greater the density of fires.” The study also notes that California’s fire season has increase by more than two months and that the increase in smaller fires caused by human activity has fed into the increase in wildfires. We place an ever increasing burden upon our fire services by building dense housing in and near wilderness, whether or not it is part of the General Plan. We must place common sense about fire prevention over development if we are serious about preserving human life as well as wilderness and wildlife.

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Appendix B

Air Quality

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South Coast Air Quality Management District

Air Quality Significance Thresholds
From: South Coast AQMD Air Quality Significance
Thresholds (April 2019).



South Coast AQMD Air Quality Significance Thresholds

Mass Daily Thresholds ^a		
Pollutant	Construction ^b	Operation ^c
NO_x	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM₁₀	150 lbs/day	150 lbs/day
PM_{2.5}	55 lbs/day	55 lbs/day
SO_x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
GHG	10,000 MT/yr CO ₂ eq for industrial facilities	
Ambient Air Quality Standards for Criteria Pollutants ^d		
NO₂ 1-hour average annual arithmetic mean	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM₁₀ 24-hour average annual average	10.4 µg/m ³ (construction) ^e & 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM_{2.5} 24-hour average	10.4 µg/m ³ (construction) ^e & 2.5 µg/m ³ (operation)	
SO₂ 1-hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	South Coast AQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal)	

^a Source: South Coast AQMD CEQA Handbook (South Coast AQMD, 1993)

^b Construction thresholds apply to both the South Coast Air Basin and Coachella Valley (Salton Sea and Mojave Desert Air Basins).

^c For Coachella Valley, the mass daily thresholds for operation are the same as the construction thresholds.

^d Ambient air quality thresholds for criteria pollutants based on South Coast AQMD Rule 1303, Table A-2 unless otherwise stated.

^e Ambient air quality threshold based on South Coast AQMD Rule 403.

KEY: lbs/day = pounds per day ppm = parts per million µg/m³ = microgram per cubic meter ≥ = greater than or equal to
 MT/yr CO₂eq = metric tons per year of CO₂ equivalents > = greater than

South Coast Air Quality Management District

Mass Rate Localized Significance Thresholds
Look-Up Tables
From: Final Localized Significance Threshold
Methodology, Appendix C (June 2003, Revised 2008).

**Table C-1. 2006 – 2008 Thresholds for Construction and Operation with
Gradual Conversion of NO_x to NO₂**

SRA No.	Source Receptor Area	Allowable emissions (lbs/day) as a function of receptor distance (meters) from site boundary									
		1 Acre					2 Acre				
		25	50	100	200	500	25	50	100	200	500
1	Central LA	74	74	82	106	168	108	106	110	126	179
2	Northwest Coastal LA County	103	104	121	156	245	147	143	156	186	262
3	Southwest Coastal LA County	91	93	107	139	218	131	128	139	165	233
4	South Coastal LA County	57	58	68	90	142	82	80	87	106	151
5	Southeast LA County	80	81	94	123	192	114	111	121	145	205
6	West San Fernando Valley	103	104	121	157	245	147	143	156	187	263
7	East San Fernando Valley	80	81	94	122	191	114	111	121	144	204
8	West San Gabriel Valley	69	69	81	104	164	98	95	104	124	175
9	East San Gabriel Valley	89	112	159	251	489	128	151	200	284	513
10	Pomona/Walnut Valley	103	129	185	292	570	149	175	230	330	598
11	South San Gabriel Valley	83	84	96	123	193	121	118	126	147	206
12	South Central LA County	46	46	54	70	109	65	64	69	82	117
13	Santa Clarita Valley	114	115	133	173	273	163	159	172	204	291
15	San Gabriel Mountains	114	115	133	173	273	163	159	172	204	291
16	North Orange County	103	104	121	159	252	147	143	156	186	269
17	Central Orange County	81	83	98	123	192	115	114	125	148	205
18	North Coastal Orange County	92	93	108	140	219	131	128	139	165	235
19	Saddleback Valley	91	93	108	140	218	131	127	139	165	233
20	Central Orange County Coastal	92	93	108	140	219	131	128	139	165	235
21	Capistrano Valley	91	93	108	140	218	131	127	139	165	233
22	Norco/Corona	118	148	211	334	652	170	200	263	378	684
23	Metropolitan Riverside County	118	148	212	335	652	170	200	264	379	684
24	Perris Valley	118	148	212	335	652	170	200	264	379	684
25	Lake Elsinore	162	203	292	460	896	234	275	363	521	941
26	Temecula Valley	162	203	292	460	896	234	275	363	521	941
27	Anza Area	162	203	292	460	896	234	275	363	521	941
28	Hemet/San Jacinto Valley	162	203	292	460	896	234	275	363	521	941
29	Banning Airport	103	131	189	299	585	149	176	234	340	614
30	Coachella Valley	132	166	238	376	733	191	225	296	425	769
31	East Riverside County	132	166	238	376	733	191	225	296	425	769
32	Northwest San Bernardino Valley	118	148	211	334	652	170	200	263	378	684
33	Southwest San Bernardino Valley	118	148	211	334	652	170	200	263	378	684
34	Central San Bernardino Valley	118	148	211	334	652	170	200	263	378	684
35	East San Bernardino Valley	118	148	211	334	651	170	200	263	377	683
36	West San Bernardino Mountains	118	148	211	334	652	170	200	263	378	684
37	Central San Bernardino Mountains	118	148	211	334	652	170	200	263	378	684
38	East San Bernardino Mountains	118	148	211	334	651	170	200	263	377	683

**Table C-1. 2006 – 2008 Thresholds for Construction and Operation with
Gradual Conversion of NO_x to NO₂ (Continued)**

SRA No.	Source Receptor Area	Allowable emissions (lbs/day) as a function of receptor distance (meters) from site boundary				
		5 Acre				
		25	50	100	200	500
1	Central LA	161	157	165	173	212
2	Northwest Coastal LA County	221	212	226	250	312
3	Southwest Coastal LA County	197	189	202	222	277
4	South Coastal LA County	123	118	126	141	179
5	Southeast LA County	172	165	176	194	244
6	West San Fernando Valley	221	212	226	250	313
7	East San Fernando Valley	172	165	176	194	242
8	West San Gabriel Valley	148	141	151	166	208
9	East San Gabriel Valley	203	227	286	368	584
10	Pomona/Walnut Valley	236	265	330	426	681
11	South San Gabriel Valley	183	176	184	202	245
12	South Central LA County	98	94	101	111	139
13	Santa Clarita Valley	246	236	251	275	345
15	San Gabriel Mountains	246	236	251	275	345
16	North Orange County	221	212	226	249	317
17	Central Orange County	183	167	180	202	245
18	North Coastal Orange County	197	190	202	223	278
19	Saddleback Valley	197	189	201	222	278
20	Central Orange County Coastal	197	190	202	223	278
21	Capistrano Valley	197	189	201	222	278
22	Norco/Corona	270	302	378	486	778
23	Metropolitan Riverside County	270	302	378	488	780
24	Perris Valley	270	302	378	488	780
25	Lake Elsinore	371	416	520	672	1,072
26	Temecula Valley	371	416	520	672	1,072
27	Anza Area	371	416	520	672	1,072
28	Hemet/San Jacinto Valley	371	416	520	672	1,072
29	Banning Airport	236	265	333	434	698
30	Coachella Valley	304	340	425	547	875
31	East Riverside County	304	340	425	547	875
32	Northwest San Bernardino Valley	270	303	378	486	778
33	Southwest San Bernardino Valley	270	303	378	486	778
34	Central San Bernardino Valley	270	302	378	486	778
35	East San Bernardino Valley	270	302	378	486	778
36	West San Bernardino Mountains	270	303	378	486	778
37	Central San Bernardino Mountains	270	302	378	486	778
38	East San Bernardino Mountains	270	302	378	486	778

Table C-2. 2006 – 2008 CO Emission Thresholds for Construction and Operation

SRA No.	Source Receptor Area	Allowable emissions (lbs/day) as a function of receptor distance (meters) from site boundary									
		1 Acre					2 Acre				
		25	50	100	200	500	25	50	100	200	500
1	Central LA	680	882	1,259	2,406	7,911	1,048	1,368	1,799	3,016	8,637
2	Northwest Coastal LA County	562	833	1,233	2,367	7,724	827	1,213	1,695	2,961	8,446
3	Southwest Coastal LA County	664	785	1,156	2,228	7,269	967	1,158	1,597	2,783	7,950
4	South Coastal LA County	585	789	1,180	2,296	7,558	842	1,158	1,611	2,869	8,253
5	Southeast LA County	571	735	1,088	2,104	6,854	861	1,082	1,496	2,625	7,500
6	West San Fernando Valley	426	652	1,089	2,096	6,815	644	903	1,497	2,629	7,460
7	East San Fernando Valley	498	732	1,158	2,227	7,267	786	1,068	1,594	2,786	7,947
8	West San Gabriel Valley	535	783	1,158	2,229	7,270	812	1,125	1,594	2,785	7,957
9	East San Gabriel Valley	623	945	1,914	4,803	20,721	953	1,344	2,445	5,658	22,093
10	Pomona/Walnut Valley	612	911	1,741	4,345	18,991	885	1,358	2,298	5,097	20,256
11	South San Gabriel Valley	673	760	1,113	2,110	6,884	1,031	1,143	1,554	2,660	7,530
12	South Central LA County	231	342	632	1,545	5,452	346	515	841	1,817	5,962
13	Santa Clarita Valley	590	879	1,294	2,500	8,174	877	1,256	1,787	3,108	8,933
15	San Gabriel Mountains	590	879	1,294	2,500	8,174	877	1,256	1,787	3,108	8,933
16	North Orange County	522	685	1,014	1,975	6,531	762	1,010	1,395	2,444	7,121
17	Central Orange County	485	753	1,128	2,109	6,841	715	1,041	1,547	2,685	7,493
18	North Coastal Orange County	647	738	1,090	2,096	6,841	962	1,089	1,506	2,615	7,493
19	Saddleback Valley	696	833	1,234	2,376	7,724	993	1,227	1,696	2,965	8,454
20	Central Orange County Coastal	647	738	1,090	2,096	6,841	962	1,089	1,506	2,615	7,493
21	Capistrano Valley	696	833	1,234	2,376	7,724	993	1,227	1,696	2,965	8,454
22	Norco/Corona	674	999	1,853	4,352	17,637	1,007	1,474	2,461	5,183	18,934
23	Metropolitan Riverside County	602	887	1,746	4,359	17,640	883	1,262	2,232	5,136	18,947
24	Perris Valley	602	887	1,746	4,359	17,640	883	1,262	2,232	5,136	18,947
25	Lake Elsinore	750	1,105	2,176	5,501	23,866	1,100	1,572	2,781	6,399	25,412
26	Temecula Valley	750	1,105	2,176	5,501	23,866	1,100	1,572	2,781	6,399	25,412
27	Anza Area	750	1,105	2,176	5,501	23,866	1,100	1,572	2,781	6,399	25,412
28	Hemet/San Jacinto Valley	750	1,105	2,176	5,501	23,866	1,100	1,572	2,781	6,399	25,412
29	Banning Airport	1,000	1,420	2,623	6,154	25,057	1,541	2,049	3,458	7,395	26,890
30	Coachella Valley	878	1,387	2,565	6,021	24,417	1,299	1,931	3,409	7,174	26,212
31	East Riverside County	878	1,387	2,565	6,021	24,417	1,299	1,931	3,409	7,174	26,212
32	Northwest San Bernardino Valley	863	1,328	2,423	5,691	23,065	1,232	1,877	3,218	6,778	24,768
33	Southwest San Bernardino Valley	863	1,328	2,423	5,691	23,065	1,232	1,877	3,218	6,778	24,768
34	Central San Bernardino Valley	667	1,059	2,141	5,356	21,708	972	1,463	2,738	6,346	23,304
35	East San Bernardino Valley	775	1,205	2,279	5,351	21,703	1,174	1,712	3,029	6,375	23,294
36	West San Bernardino Mountains	863	1,328	2,423	5,691	23,065	1,232	1,877	3,218	6,778	24,768
37	Central San Bernardino Mountains	667	1,059	2,141	5,356	21,708	972	1,463	2,738	6,346	23,304
38	East San Bernardino Mountains	775	1,205	2,279	5,351	21,703	1,174	1,712	3,029	6,375	23,294

Table C-2. 2006 – 2008 CO Emission Thresholds for Construction and Operation (Continued)

SRA No.	Source Receptor Area	Allowable emissions (lbs/day) as a function of receptor distance (meters) from site boundary				
		5 Acre				
		25	50	100	200	500
1	Central LA	1,861	2,331	3,030	4,547	10,666
2	Northwest Coastal LA County	1,531	1,985	2,762	4,383	10,467
3	Southwest Coastal LA County	1,796	1,984	2,608	4,119	9,852
4	South Coastal LA County	1,530	1,982	2,613	4,184	10,198
5	Southeast LA County	1,480	1,855	2,437	3,867	9,312
6	West San Fernando Valley	1,158	1,537	2,438	3,871	9,271
7	East San Fernando Valley	1,434	1,872	2,599	4,119	9,848
8	West San Gabriel Valley	1,540	1,921	2,599	4,119	9,857
9	East San Gabriel Valley	1,733	2,299	3,680	7,600	25,558
10	Pomona/Walnut Valley	1,566	2,158	3,691	7,011	23,450
11	South San Gabriel Valley	1,814	1,984	2,549	4,024	9,342
12	South Central LA County	630	879	1,368	2,514	7,389
13	Santa Clarita Valley	1,644	2,095	2,922	4,608	11,049
15	San Gabriel Mountains	1,644	2,095	2,922	4,608	11,049
16	North Orange County	1,311	1,731	2,274	3,605	8,754
17	Central Orange County	1,253	1,734	2,498	4,018	9,336
18	North Coastal Orange County	1,711	1,864	2,455	3,888	9,272
19	Saddleback Valley	1,804	2,102	2,763	4,387	10,507
20	Central Orange County Coastal	1,711	1,864	2,455	3,888	9,272
21	Capistrano Valley	1,804	2,102	2,763	4,387	10,507
22	Norco/Corona	1,700	2,470	3,964	7,350	22,490
23	Metropolitan Riverside County	1,577	2,178	3,437	6,860	22,530
24	Perris Valley	1,577	2,178	3,437	6,860	22,530
25	Lake Elsinore	1,965	2,714	4,282	8,547	29,256
26	Temecula Valley	1,965	2,714	4,282	8,547	29,256
27	Anza Area	1,965	2,714	4,282	8,547	29,256
28	Hemet/San Jacinto Valley	1,965	2,714	4,282	8,547	29,256
29	Banning Airport	2,817	3,575	5,534	10,383	31,903
30	Coachella Valley	2,292	3,237	5,331	10,178	31,115
31	East Riverside County	2,292	3,237	5,331	10,178	31,115
32	Northwest San Bernardino Valley	2,193	2,978	5,188	9,611	29,410
33	Southwest San Bernardino Valley	2,193	2,978	5,188	9,611	29,410
34	Central San Bernardino Valley	1,746	2,396	4,142	8,532	27,680
35	East San Bernardino Valley	2,075	2,890	4,765	9,044	27,650
36	West San Bernardino Mountains	2,193	2,978	5,188	9,611	29,410
37	Central San Bernardino Mountains	1,746	2,396	4,142	8,532	27,680
38	East San Bernardino Mountains	2,075	2,890	4,765	9,044	27,650

Table C-3. PM10 Emission Thresholds for Operation

SRA No.	Source Receptor Area	Significance Threshold of 2.5 mg/m ³ Allowable emissions (lbs/day) as a function of receptor distance (meters) from boundary of site									
		1 Acre					2 Acre				
		25	50	100	200	500	25	50	100	200	500
1	Central LA	2	4	8	17	43	2	6	11	20	46
2	Northwest Coastal LA County	1	3	7	14	36	2	5	9	16	37
3	Southwest Coastal LA County	1	4	7	14	34	2	6	9	16	36
4	South Coastal LA County	1	3	7	15	38	2	5	9	17	40
5	Southeast LA County	1	3	8	16	42	2	5	10	18	44
6	West San Fernando Valley	1	3	7	15	38	2	5	8	16	39
7	East San Fernando Valley	1	3	7	13	33	2	5	9	15	35
8	West San Gabriel Valley	1	3	7	14	37	2	5	9	16	39
9	East San Gabriel Valley	2	4	9	19	48	2	6	11	20	50
10	Pomona/Walnut Valley	1	3	7	14	36	2	5	8	16	38
11	South San Gabriel Valley	1	4	7	15	37	2	6	9	17	39
12	South Central LA County	1	3	7	13	34	2	5	9	15	36
13	Santa Clarita Valley	1	3	6	13	32	2	5	8	15	34
15	San Gabriel Mountains	1	3	6	13	32	2	5	8	15	34
16	North Orange County	1	3	6	13	33	2	4	8	15	35
17	Central Orange County	1	3	7	15	38	2	5	9	17	40
18	North Coastal Orange County	1	4	7	13	33	2	6	9	15	35
19	Saddleback Valley	1	3	6	12	29	2	5	8	14	31
20	Central Orange County Coastal	1	4	7	13	33	2	6	9	15	35
21	Capistrano Valley	1	3	6	12	29	2	5	8	14	31
22	Norco/Corona	1	3	8	18	48	2	5	10	20	50
23	Metropolitan Riverside County	1	3	8	17	43	2	5	10	18	45
24	Perris Valley	1	3	8	17	43	2	5	10	18	45
25	Lake Elsinore	1	3	8	17	43	2	5	10	18	45
26	Temecula Valley	1	3	8	17	43	2	5	10	18	45
27	Anza Area	1	3	8	17	43	2	5	10	18	45
28	Hemet/San Jacinto Valley	1	3	8	17	43	2	5	10	18	45
29	Banning Airport	2	5	14	31	84	3	8	18	38	98
30	Coachella Valley	1	3	9	20	52	2	6	16	36	97
31	East Riverside County	1	3	9	20	52	2	6	16	36	97
32	Northwest San Bernardino Valley	2	4	11	25	68	2	5	9	16	39
33	Southwest San Bernardino Valley	2	4	11	25	68	2	5	9	16	39
34	Central San Bernardino Valley	1	3	8	18	47	2	6	10	20	50
35	East San Bernardino Valley	1	3	9	20	53	2	5	11	22	56
36	West San Bernardino Mountains	2	4	11	25	68	2	5	9	16	39
37	Central San Bernardino Mountains	1	3	8	18	47	2	6	10	20	50
38	East San Bernardino Mountains	1	3	9	20	53	2	5	11	22	56

Table C-3. PM10 Emission Thresholds for Operation (Continued)

SRA No.	Source Receptor Area	Significance Threshold of 2.5 mg/m ³ Allowable emissions (lbs/day) as a function of receptor distance (meters) from boundary of site				
		5 acres				
		25	50	100	200	500
1	Central LA	4	12	17	26	53
2	Northwest Coastal LA County	3	10	13	21	42
3	Southwest Coastal LA County	4	12	15	21	41
4	South Coastal LA County	4	10	14	22	46
5	Southeast LA County	4	10	15	23	49
6	West San Fernando Valley	3	9	13	21	44
7	East San Fernando Valley	4	11	14	21	41
8	West San Gabriel Valley	3	9	13	21	44
9	East San Gabriel Valley	4	11	16	26	55
10	Pomona/Walnut Valley	3	9	13	20	42
11	South San Gabriel Valley	4	11	15	22	45
12	South Central LA County	4	10	14	20	40
13	Santa Clarita Valley	3	10	13	19	39
15	San Gabriel Mountains	3	10	13	19	39
16	North Orange County	3	9	12	19	40
17	Central Orange County	3	10	14	22	45
18	North Coastal Orange County	4	11	14	21	41
19	Saddleback Valley	3	9	12	18	36
20	Central Orange County Coastal	4	11	14	21	41
21	Capistrano Valley	3	9	12	18	36
22	Norco/Corona	3	9	14	25	55
23	Metropolitan Riverside County	4	10	14	23	50
24	Perris Valley	4	10	14	23	50
25	Lake Elsinore	4	10	14	23	50
26	Temecula Valley	4	10	14	23	50
27	Anza Area	4	10	14	23	50
28	Hemet/San Jacinto Valley	4	10	14	23	50
29	Banning Airport	6	16	25	44	98
30	Coachella Valley	4	11	16	27	60
31	East Riverside County	4	11	16	27	60
32	Northwest San Bernardino Valley	4	12	20	34	78
33	Southwest San Bernardino Valley	4	12	20	34	78
34	Central San Bernardino Valley	4	11	16	26	55
35	East San Bernardino Valley	4	11	16	28	62
36	West San Bernardino Mountains	4	12	20	34	78
37	Central San Bernardino Mountains	4	11	16	26	55
38	East San Bernardino Mountains	4	11	16	28	62

Table C-4. PM10 Emission Thresholds for Construction

SRA No.	Source Receptor Area	Significance Threshold of 10.4 mg/m ³ Allowable emissions (lbs/day) as a function of receptor distance (meters) from boundary of site									
		1 Acre					2 Acre				
		25	50	100	200	500	25	50	100	200	500
1	Central LA	5	15	33	70	179	8	25	43	80	190
2	Northwest Coastal LA County	4	12	27	57	146	6	19	34	64	154
3	Southwest Coastal LA County	5	14	28	56	140	8	23	37	65	148
4	South Coastal LA County	4	13	29	61	158	7	21	37	70	167
5	Southeast LA County	4	13	30	66	173	7	21	39	74	182
6	West San Fernando Valley	4	11	27	59	155	6	17	33	66	162
7	East San Fernando Valley	4	13	26	54	136	7	21	34	62	144
8	West San Gabriel Valley	4	11	27	58	152	6	19	34	66	160
9	East San Gabriel Valley	5	14	34	75	199	7	22	42	84	207
10	Pomona/Walnut Valley	4	11	26	57	148	6	18	33	64	156
11	South San Gabriel Valley	5	13	29	60	153	7	22	37	68	162
12	South Central LA County	4	12	26	54	139	7	20	34	62	146
13	Santa Clarita Valley	4	12	25	51	131	6	19	32	59	139
15	San Gabriel Mountains	4	12	25	51	131	6	19	32	59	139
16	North Orange County	4	10	24	53	137	6	17	31	60	145
17	Central Orange County	4	12	28	60	158	6	19	35	68	166
18	North Coastal Orange County	4	13	27	54	135	7	21	35	62	144
19	Saddleback Valley	4	11	24	48	121	6	18	30	55	129
20	Central Orange County Coastal	4	13	27	54	135	7	21	35	62	144
21	Capistrano Valley	4	11	24	48	121	6	18	30	55	129
22	Norco/Corona	4	11	32	73	198	6	18	39	81	206
23	Metropolitan Riverside County	4	12	30	67	178	7	20	38	75	186
24	Perris Valley	4	12	30	67	178	7	20	38	75	186
25	Lake Elsinore	4	12	30	67	178	7	20	38	75	186
26	Temecula Valley	4	12	30	67	178	7	20	38	75	186
27	Anza Area	4	12	30	67	178	7	20	38	75	186
28	Hemet/San Jacinto Valley	4	12	30	67	178	7	20	38	75	186
29	Banning Airport	6	19	55	129	348	10	32	73	157	407
30	Coachella Valley	4	13	35	80	214	7	22	44	89	223
31	East Riverside County	4	13	35	80	214	7	22	44	89	223
32	Northwest San Bernardino Valley	5	14	44	103	280	6	19	34	66	160
33	Southwest San Bernardino Valley	5	14	44	103	280	6	19	34	66	160
34	Central San Bernardino Valley	4	13	33	74	196	7	22	42	83	205
35	East San Bernardino Valley	4	12	36	82	220	7	21	44	90	230
36	West San Bernardino Mountains	5	14	44	103	280	6	19	34	66	160
37	Central San Bernardino Mountains	4	13	33	74	196	7	22	42	83	205
38	East San Bernardino Mountains	4	12	36	82	220	7	21	44	90	230

Table C-4. PM10 Emission Thresholds for Construction (Continued)

SRA No.	Source Receptor Area	Significance Threshold of 10.4 mg/m ³ Allowable emissions (lbs/day) as a function of receptor distance (meters) from boundary of site				
		5 acres				
		25	50	100	200	500
1	Central LA	16	50	69	107	219
2	Northwest Coastal LA County	13	40	55	84	174
3	Southwest Coastal LA County	15	46	60	88	171
4	South Coastal LA County	14	42	58	92	191
5	Southeast LA County	14	42	60	95	203
6	West San Fernando Valley	11	35	51	84	181
7	East San Fernando Valley	14	42	56	84	167
8	West San Gabriel Valley	12	37	53	85	180
9	East San Gabriel Valley	14	43	63	105	229
10	Pomona/Walnut Valley	12	36	51	82	175
11	South San Gabriel Valley	14	43	59	91	186
12	South Central LA County	13	41	55	83	166
13	Santa Clarita Valley	12	38	52	79	161
15	San Gabriel Mountains	12	38	52	79	161
16	North Orange County	11	34	49	78	165
17	Central Orange County	13	39	55	88	188
18	North Coastal Orange County	14	44	57	85	167
19	Saddleback Valley	12	37	49	74	148
20	Central Orange County Coastal	14	44	57	85	167
21	Capistrano Valley	12	37	49	74	148
22	Norco/Corona	12	37	58	101	228
23	Metropolitan Riverside County	13	40	59	96	207
24	Perris Valley	13	40	59	96	207
25	Lake Elsinore	13	40	59	96	207
26	Temecula Valley	13	40	59	96	207
27	Anza Area	13	40	59	96	207
28	Hemet/San Jacinto Valley	13	40	59	96	207
29	Banning Airport	21	67	104	180	405
30	Coachella Valley	14	44	67	112	248
31	East Riverside County	14	44	67	112	248
32	Northwest San Bernardino Valley	16	50	80	140	322
33	Southwest San Bernardino Valley	16	50	80	140	322
34	Central San Bernardino Valley	14	44	65	106	229
35	East San Bernardino Valley	14	42	66	113	255
36	West San Bernardino Mountains	16	50	80	140	322
37	Central San Bernardino Mountains	14	44	65	106	229
38	East San Bernardino Mountains	14	42	66	113	255

Table C-5. PM2.5 Emission Thresholds for Operation

SRA No.	Source Receptor Area	Significance Threshold of 2.5 ug/m ³ Allowable emissions (lbs/day) as a function of receptor distance (meters) from boundary of site									
		1 Acre					2 Acre				
		25	50	100	200	500	25	50	100	200	500
1	Central LA	1	2	3	6	25	2	2	3	7	27
2	Northwest Coastal LA County	1	1	2	5	19	1	2	3	6	20
3	Southwest Coastal LA County	1	2	3	5	18	1	2	3	6	20
4	South Coastal LA County	1	2	3	7	23	1	2	4	8	25
5	Southeast LA County	1	1	2	5	21	1	2	3	6	22
6	West San Fernando Valley	1	1	2	5	19	1	2	2	5	21
7	East San Fernando Valley	1	1	2	5	17	1	2	3	5	18
8	West San Gabriel Valley	1	1	2	5	19	1	2	3	5	20
9	East San Gabriel Valley	1	2	3	6	23	2	2	3	7	25
10	Pomona/Walnut Valley	1	1	2	5	18	1	2	3	5	20
11	South San Gabriel Valley	1	2	3	5	20	2	2	3	6	22
12	South Central LA County	1	1	2	4	17	1	2	3	5	18
13	Santa Clarita Valley	1	1	2	5	18	1	2	2	5	20
15	San Gabriel Mountains	1	1	2	5	18	1	2	2	5	20
16	North Orange County	1	1	3	5	18	1	2	3	6	19
17	Central Orange County	1	1	2	6	21	1	2	3	6	22
18	North Coastal Orange County	1	2	3	6	19	2	2	3	7	20
19	Saddleback Valley	1	1	2	5	17	1	2	3	6	18
20	Central Orange County Coastal	1	2	3	6	19	2	2	3	7	20
21	Capistrano Valley	1	1	2	5	17	1	2	3	6	18
22	Norco/Corona	1	2	3	6	23	2	2	3	6	24
23	Metropolitan Riverside County	1	1	2	5	21	1	2	3	6	22
24	Perris Valley	1	1	2	5	21	1	2	3	6	22
25	Lake Elsinore	1	1	2	5	21	1	2	3	6	22
26	Temecula Valley	1	1	2	5	21	1	2	3	6	22
27	Anza Area	1	1	2	5	21	1	2	3	6	22
28	Hemet/San Jacinto Valley	1	1	2	5	21	1	2	3	6	22
29	Banning Airport	1	2	4	9	38	2	3	5	10	40
30	Coachella Valley	1	2	3	6	26	2	2	3	7	27
31	East Riverside County	1	2	3	6	26	2	2	3	7	27
32	Northwest San Bernardino Valley	1	2	3	8	34	2	2	4	9	36
33	Southwest San Bernardino Valley	1	2	3	8	34	2	2	4	9	36
34	Central San Bernardino Valley	1	2	3	6	24	1	2	3	7	25
35	East San Bernardino Valley	1	2	3	7	27	2	2	4	8	29
36	West San Bernardino Mountains	1	2	3	8	34	2	2	4	9	36
37	Central San Bernardino Mountains	1	2	3	6	24	1	2	3	7	25
38	East San Bernardino Mountains	1	2	3	7	27	2	2	4	8	29

Table C-5. PM2.5 Emission Thresholds for Operation (Continued)

SRA No.	Source Receptor Area	Significance Threshold of 2.5 ug/m3 Allowable emissions (lbs/day) as a function of receptor distance (meters) from boundary of site				
		5 Acre				
		25	50	100	200	500
1	Central LA	2	3	5	9	31
2	Northwest Coastal LA County	2	2	4	7	23
3	Southwest Coastal LA County	2	3	5	9	24
4	South Coastal LA County	2	3	5	10	29
5	Southeast LA County	2	3	4	8	25
6	West San Fernando Valley	2	2	3	7	23
7	East San Fernando Valley	2	3	4	7	21
8	West San Gabriel Valley	2	3	4	7	23
9	East San Gabriel Valley	2	3	5	9	28
10	Pomona/Walnut Valley	2	3	4	7	23
11	South San Gabriel Valley	2	3	5	9	25
12	South Central LA County	2	3	4	7	21
13	Santa Clarita Valley	2	2	3	7	23
15	San Gabriel Mountains	2	2	3	7	23
16	North Orange County	2	3	4	8	23
17	Central Orange County	2	3	4	8	27
18	North Coastal Orange County	2	3	5	9	25
19	Saddleback Valley	2	3	4	8	22
20	Central Orange County Coastal	2	3	5	9	25
21	Capistrano Valley	2	3	4	8	22
22	Norco/Corona	2	3	5	9	28
23	Metropolitan Riverside County	2	3	4	8	26
24	Perris Valley	2	3	4	8	26
25	Lake Elsinore	2	3	4	8	26
26	Temecula Valley	2	3	4	8	26
27	Anza Area	2	3	4	8	26
28	Hemet/San Jacinto Valley	2	3	4	8	26
29	Banning Airport	3	4	6	14	46
30	Coachella Valley	2	3	5	9	31
31	East Riverside County	2	3	5	9	31
32	Northwest San Bernardino Valley	2	3	5	11	41
33	Southwest San Bernardino Valley	2	3	5	11	41
34	Central San Bernardino Valley	2	3	5	9	29
35	East San Bernardino Valley	3	3	5	10	34
36	West San Bernardino Mountains	2	3	5	11	41
37	Central San Bernardino Mountains	2	3	5	9	29
38	East San Bernardino Mountains	3	3	5	10	34

Table C-6. PM2.5 Emission Thresholds for Construction

SRA No.	Source Receptor Area	Significance Threshold of 10.4 ug/m ³ Allowable emissions (lbs/day) as a function of receptor distance (meters) from boundary of site									
		1 Acre					2 Acre				
		25	50	100	200	500	25	50	100	200	500
1	Central LA	3	5	10	24	102	5	7	12	28	110
2	Northwest Coastal LA County	3	4	8	18	77	4	5	10	21	82
3	Southwest Coastal LA County	3	5	9	21	75	5	7	12	25	81
4	South Coastal LA County	3	5	10	26	93	5	7	13	30	101
5	Southeast LA County	3	4	8	19	86	4	6	10	22	92
6	West San Fernando Valley	3	4	7	18	79	4	5	9	21	84
7	East San Fernando Valley	3	4	8	18	68	4	6	10	21	73
8	West San Gabriel Valley	3	4	7	18	77	4	5	9	21	82
9	East San Gabriel Valley	3	5	9	22	94	5	7	12	26	100
10	Pomona/Walnut Valley	3	4	7	18	75	4	6	10	21	80
11	South San Gabriel Valley	4	5	9	20	83	5	8	12	24	89
12	South Central LA County	3	4	7	17	70	4	6	9	19	74
13	Santa Clarita Valley	3	4	7	18	74	4	5	9	20	80
15	San Gabriel Mountains	3	4	7	18	74	4	5	9	20	80
16	North Orange County	3	4	9	20	74	4	6	11	24	79
17	Central Orange County	3	4	9	22	85	4	6	11	25	92
18	North Coastal Orange County	3	5	9	22	76	5	7	12	26	83
19	Saddleback Valley	3	4	8	19	68	4	6	10	22	74
20	Central Orange County Coastal	3	5	9	22	76	5	7	12	26	83
21	Capistrano Valley	3	4	8	19	68	4	6	10	22	74
22	Norco/Corona	3	5	9	22	92	5	7	12	25	98
23	Metropolitan Riverside County	3	4	8	20	86	4	6	10	23	91
24	Perris Valley	3	4	8	20	86	4	6	10	23	91
25	Lake Elsinore	3	4	8	20	86	4	6	10	23	91
26	Temecula Valley	3	4	8	20	86	4	6	10	23	91
27	Anza Area	3	4	8	20	86	4	6	10	23	91
28	Hemet/San Jacinto Valley	3	4	8	20	86	4	6	10	23	91
29	Banning Airport	4	7	14	36	156	6	9	17	41	166
30	Coachella Valley	3	5	10	24	105	5	7	12	28	112
31	East Riverside County	3	5	10	24	105	5	7	12	28	112
32	Northwest San Bernardino Valley	4	6	12	32	141	5	8	14	36	150
33	Southwest San Bernardino Valley	4	6	12	32	141	5	8	14	36	150
34	Central San Bernardino Valley	3	5	9	23	98	4	6	12	26	104
35	East San Bernardino Valley	4	5	10	26	112	5	7	13	30	120
36	West San Bernardino Mountains	4	6	12	32	141	5	8	14	36	150
37	Central San Bernardino Mountains	3	5	9	23	98	4	6	12	26	104
38	East San Bernardino Mountains	4	5	10	26	112	5	7	13	30	120

Table C-6. PM2.5 Emission Thresholds for Construction (Continued)

SRA No.	Source Receptor Area	Significance Threshold of 10.4 ug/m ³ Allowable emissions (lbs/day) as a function of receptor distance (meters) from boundary of site				
		5 Acre				
		25	50	100	200	500
1	Central LA	8	11	18	36	126
2	Northwest Coastal LA County	6	8	14	29	95
3	Southwest Coastal LA County	8	11	19	35	96
4	South Coastal LA County	8	10	18	39	120
5	Southeast LA County	7	10	15	30	103
6	West San Fernando Valley	6	8	13	26	96
7	East San Fernando Valley	8	10	15	28	86
8	West San Gabriel Valley	7	9	14	27	93
9	East San Gabriel Valley	8	11	17	35	116
10	Pomona/Walnut Valley	7	9	15	28	93
11	South San Gabriel Valley	9	12	19	34	104
12	South Central LA County	7	10	15	27	86
13	Santa Clarita Valley	6	8	13	26	95
15	San Gabriel Mountains	6	8	13	26	95
16	North Orange County	6	9	15	34	95
17	Central Orange County	7	9	15	32	109
18	North Coastal Orange County	9	11	18	35	101
19	Saddleback Valley	8	11	16	30	90
20	Central Orange County Coastal	9	11	18	35	101
21	Capistrano Valley	8	11	16	30	90
22	Norco/Corona	8	11	18	34	113
23	Metropolitan Riverside County	8	10	16	31	105
24	Perris Valley	8	10	16	31	105
25	Lake Elsinore	8	10	16	31	105
26	Temecula Valley	8	10	16	31	105
27	Anza Area	8	10	16	31	105
28	Hemet/San Jacinto Valley	8	10	16	31	105
29	Banning Airport	11	14	25	55	189
30	Coachella Valley	8	11	19	37	128
31	East Riverside County	8	11	19	37	128
32	Northwest San Bernardino Valley	9	12	21	45	170
33	Southwest San Bernardino Valley	9	12	21	45	170
34	Central San Bernardino Valley	8	10	17	35	120
35	East San Bernardino Valley	9	12	20	40	140
36	West San Bernardino Mountains	9	12	21	45	170
37	Central San Bernardino Mountains	8	10	17	35	120
38	East San Bernardino Mountains	9	12	20	40	140

Antelope Valley Air Quality Management District

Significance Thresholds

From: Antelope Valley AQMD California Environmental
Quality Act (CEQA) and Federal Conformity Guidelines,
pages 6 and 7, and Table 6 (August 2016).

Significance Thresholds

Any project is significant if it triggers or exceeds the most appropriate evaluation criteria. The District will clarify upon request which threshold is most appropriate for a given project; in general, the emissions comparison (criteria number 1) is sufficient:

1. Generates total emissions (direct and indirect) in excess of the thresholds given in Table 6;
2. Generates a violation of any ambient air quality standard when added to the local background;
3. Does not conform with the applicable attainment or maintenance plan(s) ¹;

¹ A project is deemed to not exceed this threshold, and hence not be significant, if it is consistent with the existing land use plan. Zoning changes, specific plans, general plan amendments and similar land use plan changes which do not increase dwelling unit density, do not increase vehicle trips, and do not increase vehicle miles traveled are also deemed to not exceed this threshold.

4. Exposes sensitive receptors to substantial pollutant concentrations, including those resulting in a cancer risk greater than or equal to 10 in a million and/or a Hazard Index (HI) (non-cancerous) greater than or equal to 1.*

**Refer to the Sensitive Receptor Land Use discussion above*

A significant project must incorporate mitigation sufficient to reduce its impact to a level that is not significant. A project that cannot be mitigated to a level that is not significant must incorporate all feasible mitigation. Note that the emission thresholds are given as a daily value and an annual value, so that a multi-phased project (such as a project with a construction phase and a separate operational phase) with phases shorter than one year can be compared to the daily value.

Table 6 – Significant Emissions Thresholds

Criteria Pollutant	Annual Threshold (tons)	Daily Threshold (pounds)
Greenhouse Gases (CO ₂ e)	100,000	548,000
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NO _x)	25	137
Volatile Organic Compounds (VOC)	25	137
Oxides of Sulfur (SO _x)	25	137
Particulate Matter (PM ₁₀)	15	82
Particulate Matter (PM _{2.5})	12	65
Hydrogen Sulfide (H ₂ S)	10	54
Lead (Pb)	0.6	3

Appendix C

Biological Resources

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Special-Status Species Known to Occur in Los Angeles County

Common Name	Scientific Name	Federal Status ¹	State Status ²	CRPR ³
Plants				
Agoura Hills dudleya	<i>Dudleya cymosa</i> ssp. <i>agourensis</i>	FT	None	1B.2
alkali mariposa-lily	<i>Calochortus striatus</i>	None	None	1B.2
aphanisma	<i>Aphanisma blitoides</i>	None	None	1B.2
appressed muhly	<i>Muhlenbergia appressa</i>	None	None	2B.2
Baja navarretia	<i>Navarretia peninsularis</i>	None	None	1B.2
Baja rock lichen	<i>Graphis saxorum</i>	None	None	3
Ballona cinquefoil	<i>Potentilla multijuga</i>	None	None	1A
Barstow woolly sunflower	<i>Eriophyllum mohavense</i>	None	None	1B.2
beach spectaclepod	<i>Dithyrea maritima</i>	None	ST	1B.1
Big Bear Valley woollypod	<i>Astragalus leucolobus</i>	None	None	1B.2
Blair's munzothamnus	<i>Munzothamnus blairii</i>	None	None	1B.2
Blochman's dudleya	<i>Dudleya blochmaniae</i> ssp. <i>blochmaniae</i>	None	None	1B.1
Brand's star phacelia	<i>Phacelia stellaris</i>	None	None	1B.1
Braunton's milk-vetch	<i>Astragalus brauntonii</i>	FE	None	1B.1
bright green dudleya	<i>Dudleya virens</i> ssp. <i>virens</i>	None	None	1B.2
California alkali grass	<i>Puccinellia simplex</i>	None	None	1B.2
California dissanthelium	<i>Dissanthelium californicum</i>	None	None	1B.2
California Orcutt grass	<i>Orcuttia californica</i>	FE	SE	1B.1
California satintail	<i>Imperata brevifolia</i>	None	None	2B.1
California saw-grass	<i>Cladium californicum</i>	None	None	2B.2
California screw moss	<i>Tortula californica</i>	None	None	1B.2
Catalina crossosoma	<i>Crossosoma californicum</i>	None	None	1B.2
Catalina Island dudleya	<i>Dudleya virens</i> ssp. <i>hassei</i>	None	None	1B.2
Catalina Island mountain-mahogany	<i>Cercocarpus traskiae</i>	FE	SE	1B.1
chaparral nolina	<i>Nolina cismontana</i>	None	None	1B.2
chaparral ragwort	<i>Senecio aphanactis</i>	None	None	2B.2
cliff spurge	<i>Euphorbia misera</i>	None	None	2B.2
Clokey's cryptantha	<i>Cryptantha clokeyi</i>	None	None	1B.2
coast woolly-heads	<i>Nemacaulis denudata</i> var. <i>denudata</i>	None	None	1B.2
coastal dunes milk-vetch	<i>Astragalus tener</i> var. <i>titi</i>	FE	SE	1B.1
coastal goosefoot	<i>Chenopodium littoreum</i>	None	None	1B.2
compact cobwebby thistle	<i>Cirsium occidentale</i> var. <i>compactum</i>	None	None	1B.2
Coulter's goldfields	<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	None	None	1B.1
Coulter's saltbush	<i>Atriplex coulteri</i>	None	None	1B.2
Davidson's bush-mallow	<i>Malacothamnus davidsonii</i>	None	None	1B.2
Davidson's saltscale	<i>Atriplex serenana</i> var. <i>davidsonii</i>	None	None	1B.2
decumbent goldenbush	<i>Isocoma menziesii</i> var. <i>decumbens</i>	None	None	1B.2
desert cymopterus	<i>Cymopterus deserticola</i>	None	None	1B.2
estuary seablite	<i>Suaeda esteroa</i>	None	None	1B.2

Special-Status Species Known to Occur in Los Angeles County

Common Name	Scientific Name	Federal Status ¹	State Status ²	CRPR ³
Ewan's woodbeauty	<i>Drymocallis cuneifolia</i> var. <i>ewanii</i>	None	None	1B.3
Gambel's water cress	<i>Nasturtium gambelii</i>	FE	ST	1B.1
golden-spined cereus	<i>Bergerocactus emoryi</i>	None	None	2B.2
Greata's aster	<i>Symphotrichum greatae</i>	None	None	1B.3
grey-leaved violet	<i>Viola pinetorum</i> ssp. <i>grisea</i>	None	None	1B.2
Hall's monardella	<i>Monardella macrantha</i> ssp. <i>hallii</i>	None	None	1B.3
Horn's milk-vetch	<i>Astragalus hornii</i> var. <i>hornii</i>	None	None	1B.1
hot springs fimbriatylis	<i>Fimbristylis thermalis</i>	None	None	2B.2
intermediate mariposa-lily	<i>Calochortus weedii</i> var. <i>intermedius</i>	None	None	1B.2
island green dudleya	<i>Dudleya virens</i> ssp. <i>insularis</i>	None	None	1B.2
island rush-rose	<i>Crocانthemum greenei</i>	FT	None	1B.2
Johnston's buckwheat	<i>Eriogonum microthecum</i> var. <i>johnstonii</i>	None	None	1B.3
Lancaster milk-vetch	<i>Astragalus preussii</i> var. <i>laxiflorus</i>	None	None	1B.1
late-flowered mariposa-lily	<i>Calochortus fimbriatus</i>	None	None	1B.3
lemon lily	<i>Lilium parryi</i>	None	None	1B.2
Los Angeles sunflower	<i>Helianthus nuttallii</i> ssp. <i>parishii</i>	None	None	1A
lucky morning-glory	<i>Calystegia felix</i>	None	None	1B.1
Lyon's pentachaeta	<i>Pentachaeta lyonii</i>	FE	SE	1B.1
Lyon's phacelia	<i>Phacelia lyonii</i>	None	None	1B.2
Malibu baccharis	<i>Baccharis malibuensis</i>	None	None	1B.1
many-flowered phacelia	<i>Phacelia floribunda</i>	None	None	1B.2
many-stemmed dudleya	<i>Dudleya multicaulis</i>	None	None	1B.2
marcescent dudleya	<i>Dudleya cymosa</i> ssp. <i>marcescens</i>	FT	Rare	1B.2
marsh sandwort	<i>Arenaria paludicola</i>	FE	SE	1B.1
Mason's neststraw	<i>Stylocline masonii</i>	None	None	1B.1
mesa horkelia	<i>Horkelia cuneata</i> var. <i>puberula</i>	None	None	1B.1
Mt. Gleason paintbrush	<i>Castilleja gleasoni</i>	None	Rare	1B.2
Mt. Pinos onion	<i>Allium howellii</i> var. <i>clokeyi</i>	None	None	1B.3
mud nama	<i>Nama stenocarpa</i>	None	None	2B.2
Nevin's barberry	<i>Berberis nevinii</i>	FE	SE	1B.1
Nevin's woolly sunflower	<i>Constancea nevinii</i>	None	None	1B.3
Newhall sunflower	<i>Helianthus inexpectatus</i>	None	None	1B.1
Nuttall's scrub oak	<i>Quercus dumosa</i>	None	None	1B.1
Ojai navarretia	<i>Navarretia ojaiensis</i>	None	None	1B.1
Orcutt's pincushion	<i>Chaenactis glabriuscula</i> var. <i>orcuttiana</i>	None	None	1B.1
Palmer's mariposa-lily	<i>Calochortus palmeri</i> var. <i>palmeri</i>	None	None	1B.2
Parish's brittle-scale	<i>Atriplex parishii</i>	None	None	1B.1
Parish's gooseberry	<i>Ribes divaricatum</i> var. <i>parishii</i>	None	None	1A
Parish's popcornflower	<i>Plagiobothrys parishii</i>	None	None	1B.1
Parry's spineflower	<i>Chorizanthe parryi</i> var. <i>parryi</i>	None	None	1B.1

Special-Status Species Known to Occur in Los Angeles County

Common Name	Scientific Name	Federal Status ¹	State Status ²	CRPR ³
Payne's bush lupine	<i>Lupinus paynei</i>	None	None	1B.1
Peirson's lupine	<i>Lupinus peirsonii</i>	None	None	1B.3
Peirson's spring beauty	<i>Claytonia peirsonii</i> ssp. <i>peirsonii</i>	None	None	1B.2
Peruvian dodder	<i>Cuscuta obtusiflora</i> var. <i>glandulosa</i>	None	None	2B.2
Piute Mountains navarretia	<i>Navarretia setiloba</i>	None	None	1B.1
prostrate vernal pool navarretia	<i>Navarretia prostrata</i>	None	None	1B.2
pygmy leptosiphon	<i>Leptosiphon pygmaeus</i> ssp. <i>pygmaeus</i>	None	None	1B.2
rigid fringe-pod	<i>Thysanocarpus rigidus</i>	None	None	1B.2
Robbins' nemacladus	<i>Nemacladus secundiflorus</i> var. <i>robbinsii</i>	None	None	1B.2
Rock Creek broomrape	<i>Orobanche valida</i> ssp. <i>valida</i>	None	None	1B.2
rock-loving oxytropes	<i>Oxytropis oreophila</i> var. <i>oreophila</i>	None	None	2B.3
Rosamond eriastrum	<i>Eriastrum rosamondense</i>	None	None	1B.1
Ross' pitcher sage	<i>Lepechinia rossii</i>	None	None	1B.2
sagebrush loeflingia	<i>Loeflingia squarrosa</i> var. <i>artemisiarum</i>	None	None	2B.2
salt marsh bird's-beak	<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	FE	SE	1B.2
salt spring checkerbloom	<i>Sidalcea neomexicana</i>	None	None	2B.2
San Antonio milk-vetch	<i>Astragalus lentiginosus</i> var. <i>antoniussii</i>	None	None	1B.3
San Bernardino aster	<i>Symphotrichum defoliatum</i>	None	None	1B.2
San Bernardino grass-of-Parnassus	<i>Parnassia cirrata</i> var. <i>cirrata</i>	None	None	1B.3
San Clemente Island bedstraw	<i>Galium catalinense</i> ssp. <i>acrispum</i>	None	SE	1B.3
San Clemente Island bird's-foot trefoil	<i>Acmispon argophyllus</i> var. <i>adsurgens</i>	None	SE	1B.1
San Clemente Island brodiaea	<i>Brodiaea kinkiensis</i>	None	None	1B.2
San Clemente Island buckwheat	<i>Eriogonum giganteum</i> var. <i>formosum</i>	None	None	1B.2
San Clemente Island bush-mallow	<i>Malacothamnus clementinus</i>	FE	SE	1B.1
San Clemente Island evening-primrose	<i>Camissoniopsis guadalupensis</i> ssp. <i>clementina</i>	None	None	1B.2
San Clemente Island hazardia	<i>Hazardia cana</i>	None	None	1B.2
San Clemente Island larkspur	<i>Delphinium variegatum</i> ssp. <i>kinkiense</i>	FE	SE	1B.1
San Clemente Island lotus	<i>Acmispon dendroideus</i> var. <i>traskiae</i>	FT	SE	1B.3
San Clemente Island milk-vetch	<i>Astragalus nevinii</i>	None	None	1B.2
San Clemente Island paintbrush	<i>Castilleja grisea</i>	FT	SE	1B.3
San Clemente Island triteleia	<i>Triteleia clementina</i>	None	None	1B.2
San Clemente Island woodland star	<i>Lithophragma maximum</i>	FE	SE	1B.1
San Diego button-celery	<i>Eryngium aristulatum</i> var. <i>parishii</i>	FE	SE	1B.1
San Fernando Valley spineflower	<i>Chorizanthe parryi</i> var. <i>fernandina</i>	None	SE	1B.1
San Gabriel bedstraw	<i>Galium grande</i>	None	None	1B.2
San Gabriel linanthus	<i>Linanthus concinnus</i>	None	None	1B.2
San Gabriel manzanita	<i>Arctostaphylos glandulosa</i> ssp. <i>gabrielensis</i>	None	None	1B.2
San Gabriel Mountains dudleya	<i>Dudleya densiflora</i>	None	None	1B.1
San Gabriel River dudleya	<i>Dudleya cymosa</i> ssp. <i>crebrifolia</i>	None	None	1B.2
San Nicolas Island lomatium	<i>Lomatium insulare</i>	None	None	1B.2

Special-Status Species Known to Occur in Los Angeles County

Common Name	Scientific Name	Federal Status¹	State Status²	CRPR³
Santa Barbara honeysuckle	<i>Lonicera subspicata</i> var. <i>subspicata</i>	None	None	1B.2
Santa Catalina figwort	<i>Scrophularia villosa</i>	None	None	1B.2
Santa Catalina Island bedstraw	<i>Galium catalinense</i> ssp. <i>catalinense</i>	None	None	1B.3
Santa Catalina Island currant	<i>Ribes viburnifolium</i>	None	None	1B.2
Santa Catalina Island desert-thorn	<i>Lycium brevipes</i> var. <i>hassei</i>	None	None	3.1
Santa Catalina Island ironwood	<i>Lyonothamnus floribundus</i> ssp. <i>floribundus</i>	None	None	1B.2
Santa Catalina Island manzanita	<i>Arctostaphylos catalinae</i>	None	None	1B.2
Santa Catalina Island monkeyflower	<i>Diplacus traskiae</i>	None	None	1A
Santa Cruz Island ironwood	<i>Lyonothamnus floribundus</i> ssp. <i>aspleniifolius</i>	None	None	1B.2
Santa Cruz Island winged-rockcress	<i>Sibara filifolia</i>	FE	None	1B.1
Santa Monica dudleya	<i>Dudleya cymosa</i> ssp. <i>ovatifolia</i>	FT	None	1B.1
Santa Susana tarplant	<i>Deinandra minthornii</i>	None	Rare	1B.2
scalloped moonwort	<i>Botrychium crenulatum</i>	None	None	2B.2
short-joint beavertail	<i>Opuntia basilaris</i> var. <i>brachyclada</i>	None	None	1B.2
short-sepaled lewisia	<i>Lewisia brachycalyx</i>	None	None	2B.2
showy island snapdragon	<i>Gambelia speciosa</i>	None	None	1B.2
slender mariposa-lily	<i>Calochortus clavatus</i> var. <i>gracilis</i>	None	None	1B.2
slender-horned spineflower	<i>Dodecahema leptoceras</i>	FE	SE	1B.1
smooth tarplant	<i>Centromadia pungens</i> ssp. <i>laevis</i>	None	None	1B.1
Sonoran maiden fern	<i>Thelypteris puberula</i> var. <i>sonorensis</i>	None	None	2B.2
south coast saltscale	<i>Atriplex pacifica</i>	None	None	1B.2
south island bush-poppy	<i>Dendromecon harfordii</i> var. <i>rhamnoides</i>	None	None	3.1
southern alpine buckwheat	<i>Eriogonum kennedyi</i> var. <i>alpigenum</i>	None	None	1B.3
southern island mallow	<i>Lavatera assurgentiflora</i> ssp. <i>glabra</i>	None	None	1B.1
southern jewelflower	<i>Streptanthus campestris</i>	None	None	1B.3
southern mountains skullcap	<i>Scutellaria bolanderi</i> ssp. <i>austromontana</i>	None	None	1B.2
southern tarplant	<i>Centromadia parryi</i> ssp. <i>australis</i>	None	None	1B.1
spreading navarretia	<i>Navarretia fossalis</i>	FT	None	1B.1
Tehachapi monardella	<i>Monardella linoides</i> ssp. <i>oblonga</i>	None	None	1B.3
Thorne's royal larkspur	<i>Delphinium variegatum</i> ssp. <i>thornei</i>	None	None	1B.1
thread-leaved brodiaea	<i>Brodiaea filifolia</i>	FT	SE	1B.1
Trask's cryptantha	<i>Cryptantha traskiae</i>	None	None	1B.1
Ventura Marsh milk-vetch	<i>Astragalus pycnostachyus</i> var. <i>lanosissimus</i>	FE	SE	1B.1
Wallace's nightshade	<i>Solanum wallacei</i>	None	None	1B.1
western bristly scaleseed	<i>Spermolepis lateriflora</i>	None	None	2A
western sedge	<i>Carex occidentalis</i>	None	None	2B.3
white rabbit-tobacco	<i>Pseudognaphalium leucocephalum</i>	None	None	2B.2
white-veined monardella	<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	None	None	1B.3
Wiggins' cryptantha	<i>Cryptantha wigginsii</i>	None	None	1B.2

Special-Status Species Known to Occur in Los Angeles County

Common Name	Scientific Name	Federal Status ¹	State Status ²	CRPR ³
woolly mountain-parsley	<i>Oreonana vestita</i>	None	None	1B.3
woven-spored lichen	<i>Texosporium sancti-jacobi</i>	None	None	3
Invertebrates				
El Segundo blue butterfly	<i>Euphilotes battoides allyni</i>	FE	None	-
monarch - California overwintering population	<i>Danaus plexippus</i> pop. 1	FC	None	-
Palos Verdes blue butterfly	<i>Glaucopsyche lygdamus palosverdesensis</i>	FE	None	-
quino checkerspot butterfly	<i>Euphydryas editha quino</i>	FE	None	-
Riverside fairy shrimp	<i>Streptocephalus woottoni</i>	FE	None	-
vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	FT	None	-
Fish				
arroyo chub	<i>Gila orcuttii</i>	None	SSC	-
Mohave tui chub	<i>Siphateles bicolor mohavensis</i>	FE	FP	-
Santa Ana speckled dace	<i>Rhinichthys osculus</i> ssp. 8	None	SSC	-
Santa Ana sucker	<i>Catostomus santaanae</i>	FT	None	-
steelhead - southern California DPS	<i>Oncorhynchus mykiss irideus</i> pop. 10	FE	None	-
tidewater goby	<i>Eucyclogobius newberryi</i>	FE	None	-
unarmored threespine stickleback	<i>Gasterosteus aculeatus williamsoni</i>	FE	SE, FP	-
Amphibians				
arroyo toad	<i>Anaxyrus californicus</i>	FE	SSC	-
California red-legged frog	<i>Rana draytonii</i>	FT	SSC	-
Coast Range newt	<i>Taricha torosa</i>	None	SSC	-
foothill yellow-legged frog	<i>Rana boylei</i>	None	SE, SSC	-
green sea turtle	<i>Chelonia mydas</i>	FT	None	-
southern mountain yellow-legged frog	<i>Rana muscosa</i>	FE	SE	-
western spadefoot	<i>Spea hammondi</i>	None	SSC	-
Reptiles				
California glossy snake	<i>Arizona elegans occidentalis</i>	None	SSC	-
California legless lizard	<i>Anniella</i> spp.	None	SSC	-
coast horned lizard	<i>Phrynosoma blainvillii</i>	None	SSC	-
coastal whiptail	<i>Aspidoscelis tigris stejnegeri</i>	None	SSC	-
desert tortoise	<i>Gopherus agassizii</i>	FT	ST	-
green turtle	<i>Chelonia mydas</i>	FT	None	-
Northern California legless lizard	<i>Anniella pulchra</i>	None	SSC	-
red-diamond rattlesnake	<i>Crotalus ruber</i>	None	SSC	-
Southern California legless lizard	<i>Anniella stebbinsi</i>	None	SSC	-
two-striped gartersnake	<i>Thamnophis hammondi</i>	None	SSC	-
western pond turtle	<i>Emys marmorata</i>	None	SSC	-
Birds				
American peregrine falcon	<i>Falco peregrinus anatum</i>	None	FP	-
ashy storm-petrel	<i>Hydrobates homochroa</i>	None	SSC	-

Special-Status Species Known to Occur in Los Angeles County

Common Name	Scientific Name	Federal Status ¹	State Status ²	CRPR ³
bald eagle	<i>Haliaeetus leucocephalus</i>	None	SE, FP, BGEPA	-
bank swallow	<i>Riparia riparia</i>	None	ST	-
Belding's savannah sparrow	<i>Passerculus sandwichensis beldingi</i>	None	SE	-
black swift	<i>Cypseloides niger</i>	None	SSC	-
burrowing owl	<i>Athene cunicularia</i>	None	SSC	-
California black rail	<i>Laterallus jamaicensis coturniculus</i>	None	ST, FP	-
California brown pelican	<i>Pelecanus occidentalis californicus</i>	None	FP	-
California condor	<i>Gymnogyps californianus</i>	FE	SE, FP	-
California least tern	<i>Sternula antillarum browni</i>	FE	SE, FP	-
Channel Island song sparrow	<i>Melospiza melodia graminea</i>	None	SSC	-
coastal cactus wren	<i>Campylorhynchus brunneicapillus sandiegensis</i>	None	SSC	-
coastal California gnatcatcher	<i>Poliopitila californica californica</i>	FT	SSC	-
golden eagle	<i>Aquila chrysaetos</i>	None	FP, BGEPA	-
grasshopper sparrow	<i>Ammodramus savannarum</i>	None	SSC	-
Le Conte's thrasher	<i>Toxostoma lecontei</i>	None	SSC	-
least Bell's vireo	<i>Vireo bellii pusillus</i>	FE	SE	-
light-footed Ridgway's rail	<i>Rallus longirostris levipes</i>	FE	SE, FP	-
loggerhead shrike	<i>Lanius ludovicianus</i>	None	SSC	-
marbled murrelet	<i>Brachyramphus marmoratus</i>	FT	SE	-
mountain plover	<i>Charadrius montanus</i>	None	SSC	-
northern harrier	<i>Circus hudsonius</i>	None	SSC	-
San Clemente loggerhead shrike	<i>Lanius ludovicianus mearnsi</i>	FE	SSC	-
San Clemente sage sparrow	<i>Artemisiospiza belli clementeae</i>	FT	SSC	-
Scripps's murrelet	<i>Synthliboramphus scrippsi</i>	None	ST	-
short-eared owl	<i>Asio flammeus</i>	None	SSC	-
short-tailed albatross	<i>Phoebastria albatrus</i>	FE	SSC	-
southwestern willow flycatcher	<i>Empidonax traillii extimus</i>	FE	SE	-
Swainson's hawk	<i>Buteo swainsoni</i>	None	ST	-
tricolored blackbird	<i>Agelaius tricolor</i>	None	ST, SSC	-
western snowy plover	<i>Charadrius nivosus nivosus</i>	FT	SSC	-
western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FT	SE	-
white-tailed kite	<i>Elanus leucurus</i>	None	FP	-
yellow rail	<i>Coturnicops noveboracensis</i>	None	SSC	-
yellow warbler	<i>Setophaga petechia</i>	None	SSC	-
yellow-breasted chat	<i>Icteria virens</i>	None	SSC	-
Mammals				
American badger	<i>Taxidea taxus</i>	None	SSC	-
big free-tailed bat	<i>Nyctinomops macrotis</i>	None	SSC	-
California leaf-nosed bat	<i>Macrotus californicus</i>	None	SSC	-

Special-Status Species Known to Occur in Los Angeles County

Common Name	Scientific Name	Federal Status ¹	State Status ²	CRPR ³
desert bighorn sheep	<i>Ovis canadensis nelsoni</i>	None	FP	-
Los Angeles pocket mouse	<i>Perognathus longimembris brevinasus</i>	None	SSC	-
Mohave ground squirrel	<i>Xerospermophilus mohavensis</i>	None	ST	-
Nelson's (=San Joaquin) antelope squirrel	<i>Ammospermophilus nelsoni</i>	None	ST	-
northwestern San Diego pocket mouse	<i>Chaetodipus fallax fallax</i>	None	SSC	-
Pacific pocket mouse	<i>Perognathus longimembris pacificus</i>	FE	SSC	-
pallid bat	<i>Antrozous pallidus</i>	None	SSC	-
pallid San Diego pocket mouse	<i>Chaetodipus fallax pallidus</i>	None	SSC	-
pocketed free-tailed bat	<i>Nyctinomops femorosaccus</i>	None	SSC	-
San Bernardino kangaroo rat	<i>Dipodomys merriami parvus</i>	FE	SCE, SSC	-
San Clemente Island fox	<i>Urocyon littoralis clementae</i>	FT	ST	-
San Diego black-tailed jackrabbit	<i>Lepus californicus bennettii</i>	None	SSC	-
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	None	SSC	-
Santa Catalina Island fox	<i>Urocyon littoralis catalinae</i>	FT	ST	-
Santa Catalina shrew	<i>Sorex ornatus willetti</i>	None	SSC	-
south coast marsh vole	<i>Microtus californicus stephensi</i>	None	SSC	-
southern California saltmarsh shrew	<i>Sorex ornatus salicornicus</i>	None	SSC	-
southern grasshopper mouse	<i>Onychomys torridus ramona</i>	None	SSC	-
spotted bat	<i>Euderma maculatum</i>	None	SSC	-
Tehachapi pocket mouse	<i>Perognathus alticola inexpectatus</i>	None	SSC	-
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	None	SSC	-
western mastiff bat	<i>Eumops perotis californicus</i>	None	SSC	-
western red bat	<i>Lasiurus blossevillii</i>	None	SSC	-
western yellow bat	<i>Lasiurus xanthinus</i>	None	SSC	-

¹Federal Status

FE	<i>Federally Endangered</i>	FT	<i>Federally Threatened</i>
FC	<i>Federal Candidate</i>		

²State Status

SE	<i>State Listed as Endangered</i>	SCE	<i>State Candidate for Endangered</i>
ST	<i>State Listed as Threatened</i>	Rare	<i>State Rare</i>
SSC	<i>CDFW Species of Special Concern</i>	FP	<i>CDFW Fully Protected</i>
BGEPA	<i>Bald and Golden Eagle Protection Act</i>		

³California Rare Plant Ranks (CRPR)

1A	<i>Plants presumed extirpated in California and either rare or extinct elsewhere</i>
1B	<i>Plants rare, threatened, or endangered in California and elsewhere</i>
2A	<i>Plants presumed extirpated in California but common elsewhere</i>
2B	<i>Plants rare, threatened, or endangered in California, but common elsewhere</i>
3	<i>Plants about which more information is needed, a review list</i>

Threat Code extensions and their meanings:

0.1	<i>Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)</i>
0.2	<i>Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)</i>
0.3	<i>Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)</i>

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Appendix D

Greenhouse Gas Emissions

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APPENDIX A

Greenhouse Gas Accounting Methods, Business as Usual Forecast, and Emission Reduction Targets

Purpose

This Appendix describes the greenhouse gas (GHG) accounting and projections methods for calendar year 2015 and 2018 for unincorporated Los Angeles County. It also presents methods for the 1990 and 2010 emissions backcasts; the BAU forecasts for 2030, 2035, and 2045; and the derivation of the 2045 CAP's emission reduction targets for 2030, 2035, and 2045. The document is organized into four sections corresponding with the following objectives:

Section A.1: Greenhouse Gas Emissions Inventory: 2015 and 2018

This section describes the methods for estimating baseline 2015 GHG emissions from community-induced activities and sources along with updated emission for the year 2018. The community-scale inventory includes emissions from transportation; stationary energy; industrial processes and product use (IPPU); waste and wastewater; and agriculture, forestry, and other land use (AFOLU) emissions.

Section A.2: 1990 and 2010 Greenhouse Gas Inventory and Backcasting Methods

This section describes the approach for estimating the unincorporated County's GHG emissions in the year 2010 and 1990. The backcast aligns the 2010 inventory with the updated methods and emission factors used in the 2015 and 2018 inventory updates, and projects emissions back to 1990 for purposes of aligning the 2045 CAP's target with the statewide target for 2030.

Section A.3: 2018 to 2045 Business as Usual Forecasts

This section describes the approach for modeling business-as-usual (BAU) scenario which projects future emissions based on current population and regional growth trends, land use growth patterns, and regulations or policies introduced before the 2018 inventory year. The BAU scenario demonstrates the growth in GHG emissions that would occur if no further action were to be taken by the County or State after 2018.

Section A.4: Derivation of the 2045 CAP's Emission Reduction Targets

This section describes the approach taken to derive the 2045 CAP's GHG emission reduction targets for 2030, 2035, and 2045, and how these targets align with the statewide targets codified in SB 32 for 2030 and EO B-55-18 for 2045. This section provides substantial evidence for CEQA purposes that the 2045 CAP's targets represent levels of significance for the cumulative impact of the County's GHG emissions.

A.1 Greenhouse Gas Emissions Inventory: 2015 and 2018

2015 & 2018 GHG Emissions Inventories

Introduction

The 2015 and 2018 Community-scale GHG emissions inventories for unincorporated Los Angeles County (henceforth referred to as “the County” unless otherwise specified) was developed using the Global Protocol for Community-scale GHG Emission Inventories (GPC).¹ This protocol is used for calculating and reporting emissions from community activities and sources from seven gases: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), hexafluoride (SF₆) and nitrous trifluoride (NF₃). GHG emissions from these activities are organized into five sectors: transportation, stationary energy, waste (including wastewater), industrial processes and product use (IPPU) and agriculture, forestry and other land use (AFOLU). The protocol further offers two related frameworks—the Scopes Framework and the City-induced Framework—for reporting emissions from each sector:

¹ World Resources Institute, C40 Cities Climate Leadership Group, and ICLEI - Local Governments for Sustainability. *Global Protocol for Community-scale GHG Emission Inventories*, Version 1.1. December, 2014. Available at: <https://ghgprotocol.org/greenhouse-gas-protocol-accounting-reporting-standard-cities>. Accessed January 2021.

Scopes Framework: This framework captures GHG emissions produced within a geographic boundary by categorizing emissions as scope 1, 2 and 3 emissions in each Sector:

- **Scope 1:** Emissions produced from activities and sources within the unincorporated County boundaries.
- **Scope 2:** Emissions generated from the use of grid-supplied electricity, heat, steam and/or cooling within the unincorporated County boundaries; and
- **Scope 3:** Emissions occurring outside unincorporated County boundaries due to activities taking place within the unincorporated County boundaries.

City-induced Framework: This framework measures GHG emissions attributable to activities and sources within a geographic boundary and covers selected scope 1, 2 and 3 emissions from each sector. This framework offers two reporting levels:

- **BASIC:** Includes emissions from transportation, stationary energy, and waste Sectors.
- **BASIC+:** Includes all BASIC requirements as well as emissions from transmission and distribution grid losses, transboundary transportation, In-boundary generated waste emission sources, IPPU and AFOLU.

The 2015 and 2018 GHG emissions inventories for the County use the City-induced BASIC+ Framework with global warming potential (GWP) values from the Intergovernmental Panel on Climate Change (IPCC) Fifth Assessment Report (AR5)², unless otherwise specified. The inventory is prepared using sector-specific generation and resource consumption data for relevant sub-sectors included in the BASIC+ protocol. The accounting methods, data sources and emission factors used for accounting 2015 and 2018 emissions are detailed in the subsequent sections.

The general methods used for the 2015 and 2018 inventories are the same and the descriptions herein apply to both of the inventory years.

Stationary Energy

This sector includes emissions from energy use (natural gas and electricity) in residential, commercial/institutional/agricultural, and manufacturing/industrial buildings, energy generation facilities owned by the County, off-road equipment, and fugitive emissions from oil and natural gas systems. **Table A-1** presents scopes, activity data, and emissions for the stationary energy sector. **Figure A-1** compares 2015 and 2018 GHG emissions from energy use by sub-sector.

² IPCC, Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. 2014. Available at: <https://archive.ipcc.ch/report/ar5/syr/>. Accessed January 2021

Table A-1: Stationary Energy Scope, Activity, and GHG Emissions by Sub-Sector

CATEGORY	SCOPE	ACTIVITY	2015 INVENTORY		2018 INVENTORY	
			EMISSIONS (MTCO2E)	ACTIVITY	EMISSIONS (MTCO2E)	ACTIVITY
Stationary Energy						
Residential Buildings	All	Natural Gas: 99,802,009 therms Electricity: 2,032,945,391 kWh	1,030,285	Natural Gas: 100,918,233 therms Electricity: 1,855,862,580 kWh	962,743	
Commercial, Institutional, and Agricultural Buildings	All	Natural Gas: 16,206,038 therms Electricity: 725,042,157 kWh	386,753	Natural Gas: 35,862,112 therms Electricity: 1,225,283,901 kWh	349,373	
Manufacturing and Construction Buildings	All	Natural Gas: 17,177,369 therms Electricity: 686,002,430 kWh	309,449	Natural Gas: 13,143,126 therms Electricity: 1,025,769,024 kWh	244,417	
Energy Industries	1 & 3	2 CHP and District Energy facilities 1 Waste to Energy facility ^a 3 Biomass and Auxiliary Power facilities ^a	121,252	2 CHP and District Energy facilities 1 Waste to Energy facility ^a 3 Biomass and Auxiliary Power facilities ^a	98,554	
Fugitive Emissions from Oil and Natural Gas Systems	1	1 Natural Gas Distribution and Transportation facility 1 Crude Petroleum & Natural Gas Extraction site	58,222	1 Natural Gas Distribution and Transportation facility 1 Crude Petroleum & Natural Gas Extraction site	41,066	
Agriculture, Forestry and Other Fishing Activities	1	Off-road agricultural vehicles using diesel or gasoline	2,675	Off-road agricultural vehicles using diesel or gasoline	2,658	
TOTAL			1,908,637		1,698,809	

NOTES:

^a Biogenic emissions from these facilities are not included in the inventory; only non-biogenic CH₄ and N₂O emissions are included, consistent with the GPC Protocol.

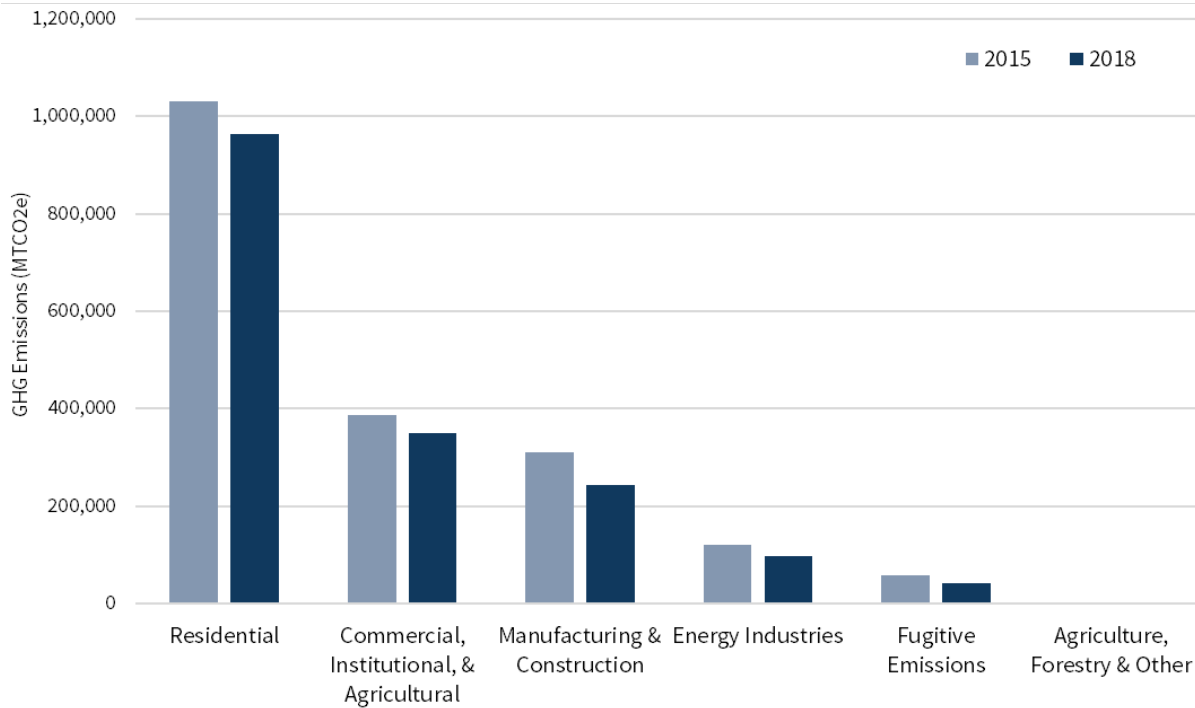


Figure A-1: 2015 & 2018 Energy Emissions by Sub-Sector

RESIDENTIAL BUILDINGS

This category includes direct emissions from the consumption of natural gas and indirect emissions from grid-supplied electricity by residential buildings in unincorporated areas. Direct GHG emissions from natural gas consumption in residential buildings are calculated using SoCalGas natural gas consumption data and emission factors from the Climate Registry³. Indirect GHG emissions from electricity consumption in residential buildings are calculated using data from SCE including electricity consumption, emission factors, and power mix. In 2018, SCE’s power mix was 36% eligible renewable, 10% hydropower and nuclear (carbon-free), 17% natural gas, and 37% unspecified fossil-fuel sources. SCE’s emission rate for 2018 electricity was 513 pounds per MWh.⁴ Emissions associated with transmission and distribution losses are accounted using a loss factor of 4.8% for California from EPA eGRID.⁵

Data Sources:

- SCE Consumption Data
Provided by SoCal Edison via LA County DRP (2021)
- SoCalGas Consumption Data
Provided by SoCalGas via LA County DRP (2021)

³ The Climate Registry, Default Emission Factors. May 1, 2018. Available at: <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climateregistry-2018-Default-Emission-Factor-Document.pdf>. Accessed January 2021.

⁴ California Energy Commission (CEC), 2018 Power Content Label. July 2019. Available at: https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_Southern_California_Edison.pdf. Accessed January 2021.

⁵ EPA, eGRID. 2018. Available at: <https://www.epa.gov/eGRID>. Accessed January 2021.

- SCE Emission Factor
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- Climate Registry
Link: <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf> (the 2018 document was the latest available at the time the inventories were prepared)
- EPA eGRID
Link: <https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid>

COMMERCIAL AND INSTITUTIONAL BUILDINGS

This category includes direct emissions from the consumption of natural gas and indirect emissions from grid-supplied electricity by non-residential buildings including commercial, municipal, institutional (such as schools, hospitals, and other public facilities) and agricultural buildings. Direct GHG emissions from natural gas consumption in non-residential buildings are calculated using SoCalGas natural gas consumption data and emission factors from The Climate Registry⁶

In June 2018, non-residential customers in unincorporated Los Angeles County were automatically enrolled in the Clean Power Alliance’s (CPA) “Clean” rate option. While participation data for 2018 were unavailable when the 2018 inventory was developed, a July 2021 member status report indicated a 98% participation rate for all non-residential customers in unincorporated County areas in 2021.⁷ For purposes of the 2018 GHG inventory, it is conservatively assumed that half the annual electricity consumption is attributed to SCE and half to CPA because full CPA enrollment for non-residential customers was not completely in effect until 2019. Under the Clean rate option in 2018, non-residential customers received 61 percent of their electricity from eligible renewable sources via the CPA, 26 percent from carbon-free sources like hydropower, and 13 percent from unspecified fossil-fuel sources like natural gas and coal. GHG emissions from CPA-provided electricity are calculated using CPA data including electricity consumption, emission factors, and power mix.⁸ CPA’s emission rates for 2018 were 10.6 pounds per MWh for the “Lean” rate and 9.8 pounds per MWh for the Clean rate.⁹ GHG emissions from SCE-provided electricity are calculated using SCE data including electricity consumption, emission factors, and power mix. SCE’s emission rate for 2018 electricity was 513 pounds per MWh.¹⁰ Emissions associated with transmission and distribution losses are accounted using a loss factor of 4.8% for California from the U.S. EPA’s eGRID2018 Summary Table (WECC California subregion).¹¹

⁶ The Climate Registry, Default Emission Factors. May 1, 2018. Available at: <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf>. Accessed January 2021.

⁷ CPA, Member Status Report: Los Angeles County. July 28, 2021.

⁸ CEC, 2018 CPA Power Content Label. July 2019. Available at: https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_Clean_Power_Alliance.pdf. Accessed January 2021.

⁹ The Climate Registry, Utility-Specific Emission Factors. 2020. Available at: <https://www.theclimateregistry.org/our-members/cris-public-reports/>. Accessed January 2021.

¹⁰ Edison International, 2020 Sustainability Report. 2021. Available at: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-2020-sustainability-report.pdf>. Accessed January 2021.

¹¹ EPA, eGRID. 2018. Available at: <https://www.epa.gov/egrid>. Accessed January 2021.

Data Sources:

- SCE Consumption Data
Provided by SoCal Edison via LA County DRP (2021)
- SoCalGas Consumption Data
Provided by SoCalGas via LA County DRP (2021)
- CPA Member Status Report (July 28, 2021)
Provided by CPA via LA County CSO (July 28, 2021)
- SCE Emission Factor
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission Factor
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- Climate Registry
Link: <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf>
- Climate Registry Information System (CRIS)
Link: [https://cris4.org/\(S\(zr3twbbnour5a5jfb1iykcx\)\)/frmLLogin.aspx](https://cris4.org/(S(zr3twbbnour5a5jfb1iykcx))/frmLLogin.aspx)
- EPA eGRID
Link: <https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid>

MANUFACTURING AND INDUSTRIAL BUILDINGS

This category includes direct emissions from the consumption of natural gas and indirect emissions from grid-supplied electricity consumption in manufacturing and industrial buildings. This category also includes direct emissions from fossil fuel combustion for electricity and heat generation by stationary equipment (such as boilers, furnaces, burners, turbines, heaters, incinerators, engines and flares) and off-road equipment (such as vehicle and mobile machinery) that are used inside building property premises.

GHG emissions from natural gas and electricity consumption are estimated using the same assumptions and methods stated under Commercial and Institutional Buildings above.

Emissions from fuel combustion of other energy sources in manufacturing facilities are documented using the California Air Resource Board's (CARB) Pollution Mapping Tool.¹² This tool provides CH₄, CO₂ and N₂O from on-site combustion and industrial processes for each facility location. CARB's OFFROAD2017 ORION¹³ tool is used to estimate emissions from fuel consumption by industrial and construction equipment used inside building premises. This tool provides daily CO₂ emissions and annual fuel consumption of diesel, gasoline and natural gas by manufacturing and construction sectors for Los Angeles County as a whole, including cities. Emissions from unincorporated Los Angeles County are estimated by scaling countywide GHG emissions based on the number of jobs in manufacturing and construction sectors in unincorporated areas in 2017.

¹² CARB, Pollution Mapping Tool. 2018. Available: https://ww3.arb.ca.gov/ei/tools/pollution_map/. Accessed January 2021.

¹³ CARB, OFFROAD ORION. 2018. Available at: <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools>. Accessed January 2021.

Note: This category only reports fossil fuel combustion-related emissions from CARB’s Pollution Mapping Tool. These emissions do not include fugitive process emissions from manufacturing facilities since they are reported under the IPPU category. Emissions reported in CARB’s Pollution Mapping tool are largely informed by emissions reported under the CARB’s Mandatory GHG Reporting Regulations (MRR).¹⁴ The MRR only requires facilities emitting more than 10,000 MTCO₂e to report their emissions. Emissions from facilities emitting under 10,000 MTCO₂e are not available and have therefore not been accounted in this inventory.

Data Sources:

- SCE Consumption Data
Provided by SoCal Edison via LA County DRP (2021)
- SoCal Gas Data
Provided by SoCal Gas via LA County DRP (2021)
- CPA Membership Report
Provided by CPA via LA County CSO (July 28, 2021)
- SCE Emission Factor
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- EPA eGRID
Link: <https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid>
- CARB OFFROAD2017 ORION
Link: <https://www.arb.ca.gov/orion/>
- CARB Pollution Mapping Tool
Link: https://www.arb.ca.gov/ei/tools/pollution_map/
- Jobs in Manufacturing and Construction
Link: <https://scag.ca.gov/sites/main/files/file-attachments/losangelescountyjp.pdf?1605653130>

ENERGY INDUSTRIES

The Energy Industries category includes emissions from primary fuel production (such as coal mining and oil and gas extraction), fuel processing and conversion (such as coal to coke in coke ovens) and on-site fuel combustion for auxiliary energy production (such as electricity generation and district heating).

Emissions from fuel and energy production in combined heat and power (CHP) plants, biomass power stations, and waste to energy facilities in unincorporated areas are documented using CARB’s Pollution Mapping Tool.¹⁵ For CHP and district energy source, the inventory includes direct natural gas combustion emissions from the Pitchess Cogeneration Station in Saugus and the Olive View Medical Center Cogeneration Station in Sylmar. Pitchess Cogeneration Station and the Olive View Medical Center Cogeneration Station were included because these facilities are both within the unincorporated

¹⁴ CARB, Mandatory GHG Reporting Regulations. April 1, 2019. Available at: <https://ww2.arb.ca.gov/mrr-regulation>. Accessed January 2021.

Emissions reported under CARB’s Pollution Mapping Tool are largely informed by emissions reported under CARB’s Mandatory GHG Reporting Regulations (MRR). The MRR only requires facilities emitting more than 10,000 MTCO₂e to report their emissions. Emissions from facilities emitting under 10,000 MTCO₂e are not available and have therefore not been accounted in this inventory.

County and owned and operated by the County. Emissions data for all three facilities were obtained from CARB's 2021 MRR database.

Waste-to-Energy facilities include Bradley Landfill in Sun Valley and the Calabasas Landfill in Agoura. These facilities convert landfill methane to energy. Only non-biogenic CH₄ and N₂O emissions from these facilities were included in the inventory because the CO₂ emissions from landfill gas combustion are considered biogenic (not anthropogenic) emissions sources by the GPC and should therefore be excluded.¹⁶ Biomass and auxiliary power facilities include Ameresco Chiquita Energy LLC in Castaic, Calabasas Landfill in Agoura, MM Lopez Energy LLC in Lake View Terrace, and Sunshine Gas Producers LLC in Sylmar. Similar to the waste to energy facilities above, only non-biogenic CH₄ and N₂O emissions from these facilities were included in the inventory.

Data Sources:

- CARB Pollution Mapping Tool
Link: https://www.arb.ca.gov/ei/tools/pollution_map/
- CARB MRR Database
Link: <https://ww2.arb.ca.gov/mrr-data>

AGRICULTURE, FORESTRY AND OTHER FISHING ACTIVITIES

Emissions from direct fuel combustion associated with agricultural activities typically result from the operation of farm vehicles and machinery (stationary and mobile) and generators to power lights, pumps, heaters, coolers and other equipment. CARB's OFFROAD2017 ORION¹⁷ tool was used to estimate emissions from direct fuel consumption by agricultural equipment (including plant and animal cultivation, afforestation and reforestation activities, and fishery activities) in Los Angeles County as a whole, including the cities. GHG emissions from unincorporated Los Angeles County were estimated by scaling countywide GHG emissions using the cropland acres in unincorporated areas in 2016.

Note: For the agricultural sector, this category only reports emissions associated with off-road vehicles and equipment. Emissions from agricultural buildings (natural gas and electricity consumption) are reported under the commercial and institutional buildings category.

Data Sources:

- CARB OFFROAD ORION
Link: <https://www.arb.ca.gov/orion/>
- NASS CropScape
Link: <https://nassgeodata.gmu.edu/CropScape/>

¹⁶ According to the GPC, "Biogenic emissions are those that result from the combustion of biomass materials that store and sequester CO₂, including materials used to make biofuels (e.g. trees, crops, vegetable oils, or animal fats)."

¹⁷ CARB, OFFROAD ORION. 2018. Available at: <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools>. Accessed January 2021.

FUGITIVE EMISSIONS FROM OIL AND NATURAL GAS SYSTEMS

Fugitive emissions include all intentional and unintentional emissions from the extraction, processing, storage and transport of oil and natural gas to the point of final use. The primary sources of fugitive emissions from oil and natural gas systems include equipment leaks, evaporation and flashing losses, venting, flaring, incineration, and accidental releases. GHG emissions from oil and natural gas systems in unincorporated areas are documented using CARB’s Pollution mapping tool.¹⁸

Data Sources:

- CARB Pollution Mapping Tool
Link: https://www.arb.ca.gov/ei/tools/pollution_map/

Transportation

The transportation sector includes emissions from fuel (gasoline, diesel, and natural gas) and electricity consumption in on-road passenger vehicles (cars, light-, medium-, and heavy-duty trucks), buses, and rail systems. Note that while Metro and Metrolink have GHG inventories for the transportation services provided by the respective agencies, they do not estimate emissions by local jurisdiction. Therefore, bus and railway emissions are independently estimated for the unincorporated County. **Table A-2** presents scopes, activity data, and emissions for the transportation sector. **Figure A-2** shows the contribution of each subsector to the Transportation sector for both the 2015 and 2018 inventories.

Table A-2: Transportation Scope, Activity, and GHG Emissions by Sub-Sector

CATEGORY	SCOPE	2015 INVENTORY		2018 INVENTORY	
		ACTIVITY	EMISSIONS (MTCO2E)	ACTIVITY	EMISSIONS (MTCO2E)
Transportation					
Passenger Vehicles	1 & 3	18,982,668 miles/day	2,797,360	19,074,692 miles/day	2,665,824
Buses	1 & 3	1,392,461,970 miles/year	31,360	1,143,144,015 miles/year	29,371
Railway	1 & 3	Metro: 634,484,952 miles/year Metrolink: 24,798 riders/day	9,413	Metro: 689,995,896 miles/year Metrolink: 25,690 riders/day	9,490
TOTAL			2,838,133		2,704,685

¹⁸ CARB, Pollution Mapping Tool. 2018. Available: https://ww3.arb.ca.gov/ei/tools/pollution_map/. Accessed January 2021.

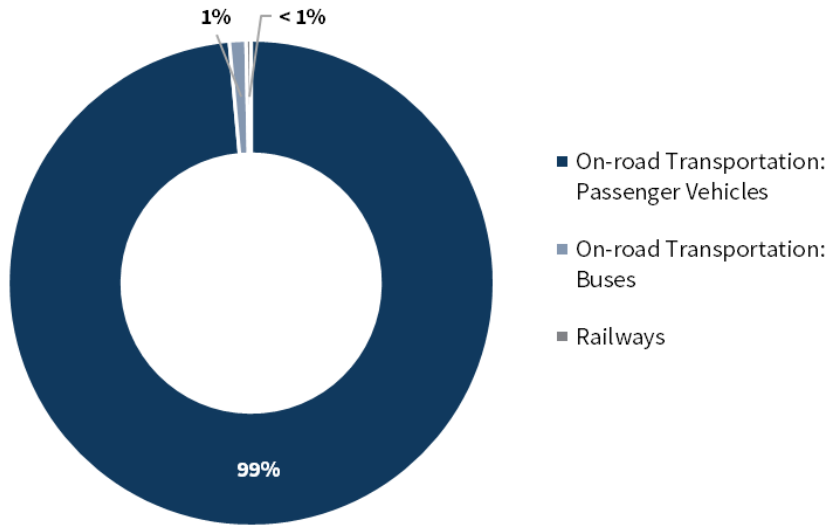


Figure A-2: 2015 & 2018 Transportation Emissions by Sub-Sector

ON ROAD TRANSPORTATION: PASSENGER VEHICLES AND TRUCKS

Emissions from passenger vehicles and trucks are estimated based on daily vehicle trips and vehicle miles traveled (VMT) by each vehicle type. VMT for the unincorporated County is estimated using a trip-based travel forecasting model developed by Southern California Association of Governments (SCAG). SCAG’s 2016 Regional Travel Demand Model, the version for which a complete dataset was available at the time of modeling, was used by Fehr and Peers (F&P) to analyze the transportation network and socioeconomic data such as population, household, and employment, to forecast daily vehicle trips and VMT for each traffic analysis zone (TAZ) within the unincorporated County.¹⁹

The 2016 SCAG model has a base year of 2012 and horizon year of 2040. VMT for the inventory years, including 2015 and 2016, was linearly interpolated from the 2012 and 2040 model values. Daily VMT are estimated using the origin-destination analysis approach (full accounting method). The Full Accounting Method accounts for VMT depending on where the trip is starting and ending. This method tracks (and “fully accounts” for) all the vehicle trips being generated by a geographic area (i.e., a city) across the entire regional network, and allows for the isolation of different types of VMT as follows.

- Internal-internal (II) VMT: Includes all trips that begin and end entirely within the geographic area of study.
- One-half of internal-external (IX) VMT: Includes one-half of trips with an origin within the geographic area of study and a destination outside of this area. This assumes that the geographic area under study shares half the responsibility for trips traveling to other areas.

¹⁹ VMT estimates for large urban areas are commonly developed using regional travel demand models. These models are developed and periodically updated, calibrated, and validated for use in long range infrastructure planning, environmental impact assessments, and air quality conformity analyses by local and regional agencies. Trip-based travel forecasting models generate (output) daily vehicle trips for each TAZ across various trip purposes based on inputs such as the transportation network and socioeconomic data such as population, household, and employment. SCAG staff maintain a regional travel demand model that uses a four-step model process to arrive at a set of forecast vehicle trips based on the data described above.

- One-half of external-internal (XI) VMT: Includes one-half of trips with an origin outside of the geographic area of study and a destination within this area. Similar to the IX trips, the geographic area of study shares the responsibility of trips traveling from other areas.
- External-external (XX) VMT: Trips through the geographic area of study are not included. This approach is consistent with the concept used for the IX and XI trips. Therefore, the XX VMT would be assigned to other areas that are generating the trips.

The Full Accounting Method was utilized to develop the VMT estimates for the unincorporated County because it more fully accounts for the length of regional travel generated in the County, not just the travel occurring on the County's in-boundary roadways. As noted above, the inventory includes emissions from trips that begin and/or end within the unincorporated County. It does not include through trips that neither begin nor end within the unincorporated areas. Daily VMT is then multiplied by 347 to calculate annual VMT.²⁰ VMT was estimated for passenger vehicles (light-duty cars and trucks) and trucks (medium- and heavy-duty trucks).

Emissions were calculated using CARB's Emission FACTors 2021 model (EMFAC2021).²¹ EMFAC2021 generates vehicle emission rates by area, year, vehicle type, fuel type, speed, and other parameters. EMFAC2021 was run for Los Angeles County for 2015 and 2018 in "emission rate" mode to generate vehicle travel emission factors for all vehicle types and fuel types for aggregated (average) speeds. The EMFAC vehicle type categories were aligned with the two categories of VMT provided by Fehr & Peers (passenger and truck).²² The EMFAC emission factors by vehicle type and fuel assigned to passenger VMT and truck VMT were then weighted using Countywide VMT and trip generation profiles for each vehicle type modeled in EMFAC2011.²³ GHG emissions were then calculated by multiplying the weighted emission factors for passenger vehicles and trucks by the origin-destination VMT for passenger vehicles and trucks supplied by Fehr & Peers.

Data Sources:

- 2016 SCAG Regional Travel Demand Model
Provided by SCAG
- Fehr & Peers Modeling Analysis (July 29, 2019; December 2021; January 2022)
- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>

²⁰ The annualization factor of 347 was provided by Fehr & Peers to estimate annual vehicle activity based on daily vehicle activity generated by SCAG's 2016 Regional Travel Demand Model.

²¹ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

²² The "passenger vehicle" category corresponds to EMFAC vehicle categories LDA, LDT1, LDT2, MCY, and MD. The "trucks" category corresponds to EMFAC vehicle categories LHDT1, LHDT2, MHDT, HHDT, and MH.

²³ For example, if the LDA vehicle type represents 70% of VMT at an emission rate of 300 grams CO₂ per mile and the LDT1 vehicle type represents 30% of VMT at an emission rate of 350 grams CO₂ per mile, the VMT-weighted emission rate for LDA and LDT1 vehicles combined is calculated as follows: 70% * 300 + 30% * 350 = 315 grams CO₂ per mile.

ON ROAD TRANSPORTATION: BUSES

GHG emissions from fuel and energy consumption by bus transit systems and paratransit agencies are accounted from Federal Transit Administration's (FTA) National Transit database at the County level (not for unincorporated County areas separately).²⁴ These agencies include the Los Angeles County Metropolitan Transportation Authority (LACMTA) and MetroBus. Electricity consumption was not available from the National Transit database. To account for electricity consumption and associated indirect GHG emissions, the total gasoline and diesel fuel use from the National Transit database was reapportioned based on the percentage of VMT by fuel type (diesel, gasoline, natural gas, electricity) from EMFAC2021 for the aggregated OBUS, SBUS, and UBUS categories in EMFAC. The CPA Clean emission factor is applied to all electricity consumption by buses serving unincorporated County areas. Emission factors for gasoline, diesel and compressed natural (CNG) gas-powered buses are taken from EMFAC2021 to calculate CO₂ and N₂O emissions. Total GHG emissions estimated for Los Angeles County were then scaled by Metro Bus ridership forecasts for unincorporated county areas to estimate GHG emissions for the unincorporated County.²⁵

Data Sources:

- FTA National Transit Database
Link: <https://www.transit.dot.gov/ntd/ntd-data>
- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>
- Metro Bus Ridership
Link: <https://isotp.metro.net/MetroRidership/Index.aspx>

RAILWAY

Diesel fuel and electricity consumed by commuter rail systems are obtained from FTA's NTD.²⁶ The database reports diesel fuel consumption by Southern California Regional Rail Authority (Metrolink) and electricity consumption by Metro Rail. GHG emission factors for diesel locomotives were obtained from the EPA national GHG inventory and emission factors for electric propulsion were obtained from the EPA's Emissions & Generation Resource Integrated Database (eGRID).²⁷ These emission factors were multiplied by the diesel fuel and electricity consumption values obtained from NTD to generate GHG emissions for Los Angeles County as a whole. Total GHG emissions for Los Angeles County were then scaled based on Metro and Metrolink ridership forecasts for unincorporated county areas to estimate GHG emissions for the unincorporated County.

Data Sources:

- FTA National Transit Database
Link: <https://www.transit.dot.gov/ntd/ntd-data>

²⁴ FTA, National Transit Database. 2018. Available at: <https://www.transit.dot.gov/ntd/ntd-data>. Accessed January 2021.

²⁵ Metro, Interactive Estimated Ridership Stats. 2021. Available at: <https://isotp.metro.net/MetroRidership/Index.aspx>. Accessed January 2021.

²⁶ FTA, National Transit Database. 2018. Available at: <https://www.transit.dot.gov/ntd/ntd-data>. Accessed January 2021.

²⁷ EPA, eGRID. 2018. Available at: <https://www.epa.gov/egrid>. Accessed January 2021.

- EPA National GHG Inventory Emission Factors
Link: https://www.epa.gov/sites/production/files/2015-12/documents/emission-factors_nov_2015.pdf
- EPA eGRID Database
Link: <https://www.epa.gov/energy/emissions-generation-resource-integrated-database-egrid>
- Metro Ridership
Link: http://media.metro.net/projects_studies/union_station/images/LAUSMP_Presentation_2013_0315.pdf

Waste and Wastewater

Emissions generated at landfills, biological treatment (composting and anaerobic digestion) and incineration facilities, and wastewater treatment plants are reported under the waste sector. These subsectors are discussed in more detail below. **Table A-3** presents scopes, activity data, and emissions for the water and wastewater sector. **Figure A-3** compares 2015 and 2018 GHG emissions from waste and wastewater by sub-sector.

Table A-3: Waste and Wastewater Scope, Activity, and GHG Emissions by Sub-Sector

CATEGORY	SCOPE	ACTIVITY	2015 INVENTORY		2018 INVENTORY	
			EMISSIONS (MTCO2E)	ACTIVITY	EMISSIONS (MTCO2E)	ACTIVITY
Waste and Wastewater						
Solid Waste Disposal	1 & 3	Disposal Tonnage: 721,493 tons	404,604	Disposal Tonnage: 935,512 tons		407,578
Biological Treatment of Solid Waste	1 & 3	Composting Tonnage: 51,111 tons	10,214	Composting Tonnage: 27,182 tons		5,309
Waste Incineration*	1 & 3	Incineration Tonnage: 3,303 tons	1,184	Incineration Tonnage: 1,876 tons		547
Wastewater Treatment	All	Population: 1,14,808	55,179	Population: 1,082,365		56,495
TOTAL			469,997			469,382

Note: Totals exclude Waste Incineration which is accounted for under Stationary Energy

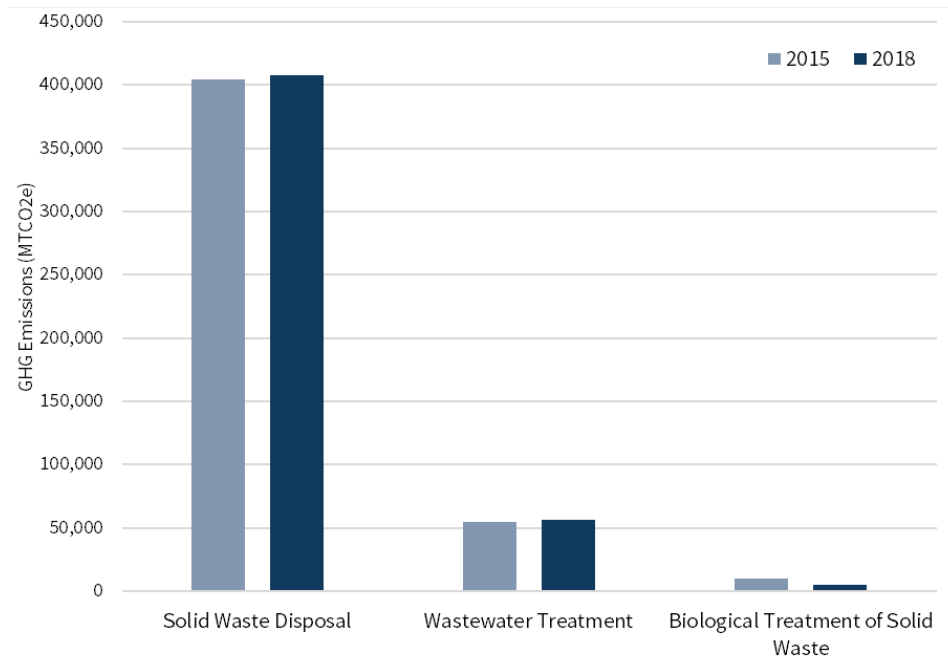


Figure A-3: 2015 & 2018 Waste and Wastewater Emissions by Sub-Sector

SOLID WASTE DISPOSAL

Landfill-related emissions are estimated using CARB’s first order of decay (FOD) model²⁸, based on waste disposal tonnage and composition data from CalRecycle’s Solid Waste Integrated System (SWIS)²⁹ and Los Angeles County Public Works Solid Waste Information Management System (SWIMS) reports.³⁰ Using these reports, unincorporated County disposal tonnage data was obtained for 62 open and closed landfills where unincorporated County residents and businesses disposed their municipal solid waste prior to 2018.

Most of the 62 in- and out-of-County landfills used by the unincorporated County have landfill gas collection (LFG) systems with combustion control. These systems collect LFG for flaring, energy production, or for producing liquified natural gas (LNG), CNG and producer gas. GHG emissions from landfill gas collection are estimated based on LFG collection rate, LFG flow to energy, and methane content from CalRecycle’s 2010 Landfill Gas Master.³¹ To determine Los Angeles County’s share of methane removal at these landfills (since many other jurisdictions contribute waste to these same landfills), total emissions from these landfills were apportioned based on waste disposed in the landfills

²⁸ CARB, Landfill Gas Tool. 2021. Available at: <https://ww2.arb.ca.gov/resources/documents/carbs-landfill-gas-tool>. Accessed January 2021.

²⁹ CalRecycle, SWIS Facility/Site Search. 2021. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>. Accessed January 2021.

³⁰ LADPW, Solid Waste Information Management System (SWIMS). 2021. Available at: <https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx>. Accessed January 2021.

³¹ CalRecycle, Landfill Gas Master. Available at: <https://www2.calrecycle.ca.gov/PublicNotices/Documents/1642>. Accessed January 2021.

by Los Angeles County versus California. California's disposal tonnage data is obtained using CalRecycle's SWIS reports for statewide disposal at the same facilities, where unincorporated County deposited municipal solid waste between 1998 and 2018. The same was done to estimate the unincorporated County's share of emissions at these landfills.

GHG emissions from landfills and landfill gas flaring for unincorporated Los Angeles County are scaled based on waste volume directed to in- and out-of-County landfills between 1998 and 2018. Emissions associated with methane flaring and recovery from landfills are reported under the waste sector. However, if the methane is recovered (via biogas or digester gas) and used for electricity generation, then the emissions are reported under the stationary energy sector as waste-to-energy facilities or biomass and auxiliary power facilities.

Data Sources:

- CARB FOD Model
Link: <https://ww2.arb.ca.gov/resources/documents/landfill-methane-emissions-tool>
- CalRecycle SWIS Reports
Link: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>
- LADPW SWIMS Reports
Link: <https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx>
- CalRecycle Landfill Gas Master
Link: <https://www2.calrecycle.ca.gov/PublicNotices/Documents/1642>

BIOLOGICAL TREATMENT OF SOLID WASTE

Biological treatment of solid waste refers to the composting and anaerobic digestion of organic waste (such as food waste, garden and park waste, sludge, and other organic waste sources).

Composting:

In 2018, Los Angeles County diverted waste to eight in-County and over 50 out-of-County composting facilities. Waste volume diverted by unincorporated County areas for composting was obtained from Los Angeles County Public Works SWIMS reports for transfer stations and non-disposal facilities.³² Waste composted at in-County facilities is assumed to be equivalent to annual waste processing capacity of in-County facilities. This data is obtained from 2019 Organics Waste Management Reports by the County Department of Public Works. Waste composted at out-of-County facilities is considered to be the difference between total waste diverted and capacity of in-County facilities. GHG emissions are calculated using wet and dry waste parameters based on waste composition disposed at in and out-of-County recycling or diversion facilities. This data is obtained from Public Works Organics Waste Management Reports.³³ GHG emissions from composting for unincorporated Los Angeles County are scaled based on waste volume directed to in- and out-of-County facilities in 2018.

³² LADPW, Solid Waste Information Management System (SWIMS). 2021. Available at: <https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx>. Accessed January 2021.

³³ Ibid

Anaerobic Digestion:

The Joint Water Pollution Control Plant (JWPCP) serves 78 Cities as well as many unincorporated communities, also manages sewage sludge using Anaerobic Digester Units. Annual waste volume processed at these facilities is obtained from 2019 Organics Waste Management Reports by Public Works.³⁴ GHG emissions produced by this facility are estimated based on content of volatile solids in food waste and sewage sludge processed in respective facilities.

GHG emissions from anaerobic digestion facilities for unincorporated Los Angeles County are scaled based on population of unincorporated areas in 2018 compared to the total Countywide population. Since the JWPCP facility uses biogas or digester gas for energy production, emissions from anaerobic digestion are included under the waste sector for informational purposes, but they are reported under stationary energy (energy industries).

Data Sources:

- LADPW SWIMS Reports
Link: <https://dpw.lacounty.gov/epd/swims/>
- Public Works 2019 Organics Waste Management Reports
Link: <https://dpw.lacounty.gov/epd/swims/News/swims-more-links.aspx?id=4>

WASTE INCINERATION

Incineration is a controlled industrial process which is often paired with energy recovery. In 2018, Los Angeles County diverted waste to three waste incineration facilities. Two of the facilities – the Commerce Refuse-to-Energy Facility (discontinued in June 2018) and the Southeast Resource Recovery Facility – are located in the County. Additionally, waste was diverted to Covanta Stanislaus Inc., which is an out-of-County facility. GHG emissions from these facilities are obtained from CARB’s MRR GHG database.³⁵

To estimate unincorporated County emissions, total countywide GHG emissions from waste incineration facilities are scaled based on waste diverted by unincorporated communities to these facilities in 2018. CalRecycle’s 2018 SWIS reports are used to determine the waste volume diverted to these facilities.³⁶ Since these facilities are used for energy production, emissions are reported under stationary energy (energy industries).

Data Sources:

- CARB MRR Database
Link: <https://ww2.arb.ca.gov/mrr-data>

³⁴ Ibid

³⁵ CARB, Mandatory GHG Reporting Regulations. April 1, 2019. Available at: <https://ww2.arb.ca.gov/mrr-regulation>. Accessed January 2021

³⁶ CalRecycle, SWIS Facility/Site Search. 2021. Available at: <https://www2.calrecycle.ca.gov/SolidWaste/Site/Search>. Accessed January 2021.

- CalRecycle SWIS Reports
Link: <https://www2.calrecycle.ca.gov/swfacilities/Directory/>

WASTEWATER TREATMENT

Emissions from wastewater treatment are estimated based on population served by sewer and septic systems in unincorporated areas. GHG emissions from wastewater treatment are estimated based on 2018 population data from the SCAG Growth and Forecast report.³⁷ Parameters and constants such as total organic carbon and protein consumption in wastewater are obtained from California GHG inventory documentation³⁸ and IPCC default parameters.³⁹

Data Sources:

- SCAG Growth and Forecast Report
Link: <http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting>
- California GHG Inventory
Link: <https://www.arb.ca.gov/cc/inventory/pubs/pubs.htm>
- IPCC Default Parameters
Link: https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/5_Volume5/V5_2_Ch2_Waste_Data.pdf

Industrial Processes and Product Use

Emissions from the industrial processes and product use (IPPU) sector include HFC and PFC emissions from products such as refrigerants, foams, aerosols and fossil fuel-based lubricants and solvents are estimated by scaling statewide emissions from the product use category. Statewide GHG emissions from product use in residential, commercial, and transportation sectors are scaled based on the unincorporated County's population.⁴⁰ State-level HFC and PFC emissions from product use in industries including electronics, food processing, metal and machinery manufacturing, and others, are scaled based on State and County industry output from respective industries and unincorporated County population in.⁴¹ GHG emissions are further adjusted based on HFC prohibitions for both Senate Bill 1013 and the CARB HFC Regulation by assuming that the use of prohibited HFCs are phase out over 30 years from prohibition date for all HFC policies before 2018.⁴² **Table A-4** presents scopes, activity data, and emissions for the IPPU sector.

³⁷ SCAG, Growth Forecasting. 2018. Available at: <https://scag.ca.gov/data-tools-geographic-information-systems>. Accessed January 2021.

³⁸ CARB, GHG Inventory Data Archive. 2021. Available at: <https://scag.ca.gov/data-tools-geographic-information-systems>. Accessed January 2021.

³⁹ IPCC, 2006 IPCC Guidelines for National Greenhouse Gas Inventories, Chapter 2: Waste Generation, Composition and Management Data. 2006. Available at: https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/5_Volume5/V5_2_Ch2_Waste_Data.pdf. Accessed March 2022.

⁴⁰ CARB, GHG Inventory Data Archive. 2021. Available at: <https://scag.ca.gov/data-tools-geographic-information-systems>. Accessed January 2021.

⁴¹ SCAG, Growth Forecasting. 2018. Available at: <https://scag.ca.gov/data-tools-geographic-information-systems>. Accessed January 2021.

⁴² CARB, HFC Prohibitions in California. November 29, 2018. Available at: <https://ww2.arb.ca.gov/resources/fact-sheets/hydrofluorocarbon-hfc-prohibitions-california>. Accessed January 2021.

Table A-4: IPPU Scope, Activity, and GHG Emissions

CATEGORY	SCOPE	2015 INVENTORY		2018 INVENTORY	
		ACTIVITY	EMISSIONS (MTCO ₂ E)	ACTIVITY	EMISSIONS (MTCO ₂ E)
IPPU					
Product Use	1	Aerosols & fire retardants, residential & transportation refrigeration and air conditioning, foam use, industrial refrigeration and air conditioning, and non-aerosol solvents Population: 1,114,808	253,529	Aerosols & fire retardants, residential & transportation refrigeration and air conditioning, foam use, industrial refrigeration and air conditioning, and non-aerosol solvents Population: 1,082,365	239,505
TOTAL			253,529		239,505

Data Sources:

- California GHG Inventory
Link: <https://www.arb.ca.gov/cc/inventory/pubs/pubs.htm>
- HFC Prohibitions
Link: <https://ww2.arb.ca.gov/resources/fact-sheets/hydrofluorocarbon-hfc-prohibitions-california>
- SCAG Growth and Forecast Report
Link: <http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting>
- IMPLAN Data (proprietary)

Agriculture Forestry and Other Land Use

The AFOLU sector accounts for emissions from land-related changes and includes agriculture, forestry and aggregate sources (including wildfires, biomass burning, and fertilizer use). This sector also includes emissions from forest land conversion. Based on historic land conversion data from 2007-2016, approximately 212 hectares of forest land is converted to urban land each year in unincorporated county areas. The conversion of a single hectare results in a one-time emission of 169 MTCO₂e; this value was multiplied by 212 to estimate total annual land conversion emissions.⁴³

This sector does not include natural carbon sequestration and storage in the County’s natural lands, working lands, and urban forecasts because these sinks are part of the natural carbon cycle and are not

⁴³ NASS, CropScope. 2021. Available at: <https://nassgeodata.gmu.edu/CropScope/>. Accessed January 2021.

anthropogenic emissions sources. Further, forest sinks are not currently included in CARB’s statewide inventory or SB 32’s Statewide GHG emission reduction target for 2030.⁴⁴

Emissions from wildfire and biomass burning generated (post-harvest agricultural burning) and fertilizer use (including liming, urea, organic and synthetic fertilizer) are reported under aggregate sources. Emissions from post-harvest biomass burning (barley, corn, wheat and almond) in unincorporated areas are estimated using 2016 cropland area from NASS CropScape⁴⁵ and relevant emission factors from the CARB 2000-2019 California GHG inventory.⁴⁶

Emissions from fertilizer use for agriculture in Los Angeles County are estimated based on California Department of Food and Agriculture (CDFA) annual reports and scaled for unincorporated areas using 2016 cropland area from NASS CropScape.⁴⁷ **Table A-5** presents scopes, activity data, and emissions for the AFOLU sector. **Figure A-4** shows the contribution of each subsector to the AFOLU sector for both the 2015 and 2018 inventories.

Table A-5: AFOLU Scope, Activity, and GHG Emissions by Sub-Sector

CATEGORY	SCOPE	2015 INVENTORY		2018 INVENTORY	
		ACTIVITY	EMISSIONS (MTCO2E)	ACTIVITY	EMISSIONS (MTCO2E)
AFOLU					
Land Use Change	1	Total Forest Land Area: 52,498 acres ^a Forest Land Conversion: -212 hectares/year Urban Tree Canopy: 11,938 hectares ^a	35,811	Total Forest Land Area: 52,498 acres ^a Forest Land Conversion: -212 hectares/year Urban Tree Canopy: 11,938 hectares ^a	35,811
Aggregate Sources and Non-CO2 Emissions Sources	1	Biomass Burning (Crops): 61 acres Liming: 152 tons Urea Application: 1,026 tons Managed Soils: 5,374 tons	25,048	Biomass Burning (Crops): 61 acres Liming: 152 tons Urea Application: 1,026 tons Managed Soils: 5,374 tons	25,048
TOTAL			60,860		60,860

NOTES:

^a Forest land area and urban tree canopy cover data is reported for informational purposes only. These data are not used to generate emissions sinks for inclusion in the GHG inventories.

⁴⁴ Moreno, Adam. Lead Natural and Working Lands Climate Scientist. California Air Resources Board. Email correspondence with ESA on November 15, 2021.

⁴⁵ NASS, CropScape. 2021. Available at: <https://nassgeodata.gmu.edu/CropScape/>. Accessed January 2021.

⁴⁶ CARB, GHG Inventory Data Archive. 2021. Available at: <https://scag.ca.gov/data-tools-geographic-information-systems>. Accessed January 2021

⁴⁷ CDFA, California Agricultural Statistics Review 2015-2016. 2016. Available at: <https://www.cdfa.ca.gov/statistics/PDFs/2016Report.pdf>. Accessed January 2021.

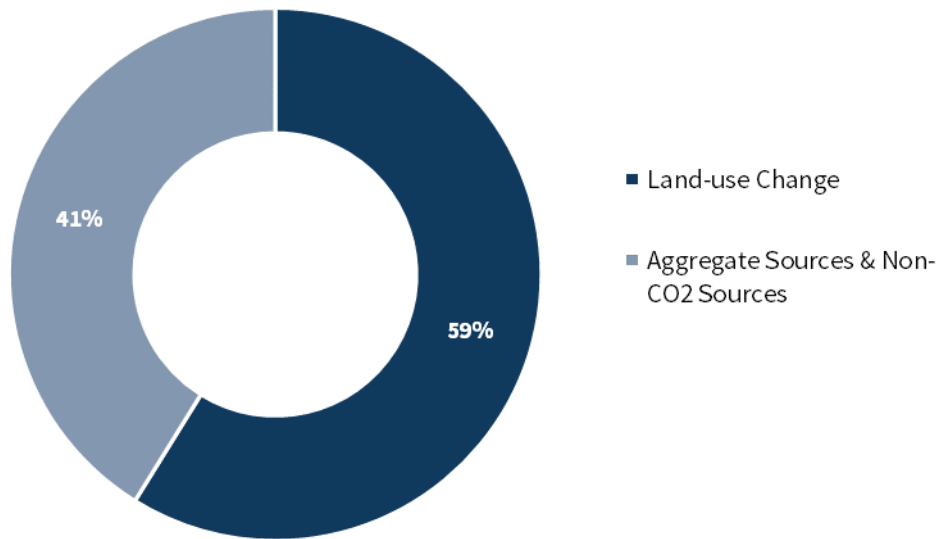


Figure A-4: 2015 & 2018 AFOLU Emissions by Sub-Sector

Data Sources:

- NASS CropScape
Link: <https://nassgeodata.gmu.edu/CropScape/>
- CDFA
Link: <https://www.cdfa.ca.gov/statistics/PDFs/2016Report.pdf>
- TreePeople
Link: <https://www.treepeople.org/los-angeles-county-tree-canopy-map-viewer/>
- California GHG Inventory
Link: <https://www.arb.ca.gov/cc/inventory/pubs/pubs.htm>
- GIS analysis by UCLA Institute of Environmental Studies

Summary Emissions

Table A-6 presents total GHG emissions for all sectors and subsectors in the 2015 and 2018 GHG inventories. **Figure A-5** compares the 2015 and 2018 inventories with a sector breakdown.

Table A-6: GHG Emissions by Sector and Sub-Sector

CATEGORY	2015 EMISSIONS (MTCO ₂ E)	2018 EMISSIONS (MTCO ₂ E)
Transportation	2,838,133	2,704,685
Passenger Vehicles	2,797,360	2,665,824
Buses	31,360	29,371
Railway	9,413	9,490
Stationary Energy	1,908,637	1,698,809
Residential Buildings	1,030,285	962,743
Commercial, Institutional, and Agricultural Buildings	386,753	349,373
Manufacturing and Construction Buildings	309,449	244,417
Energy Industries	121,252	98,554
Fugitive Emissions from Oil and Natural Gas Systems	58,222	41,066
Agriculture, Forestry and Other Fishing Activities	2,675	2,658
Waste and Wastewater	469,997	469,382
Solid Waste Disposal	404,604	407,578
Biological Treatment of Solid Waste	10,214	5,309
Waste Incineration*	1,184	547
Wastewater Treatment	55,179	56,495
IPPU	253,529	239,505
Product Use	253,529	239,505
AFOLU	60,860	60,860
Land Use Change	35,811	35,811
Aggregate Sources and Non-CO ₂ Emissions Sources	25,048	25,048
TOTAL	5,531,155	5,173,240

Note: Waste and Wastewater totals exclude Waste Incineration which is accounted for under Stationary Energy

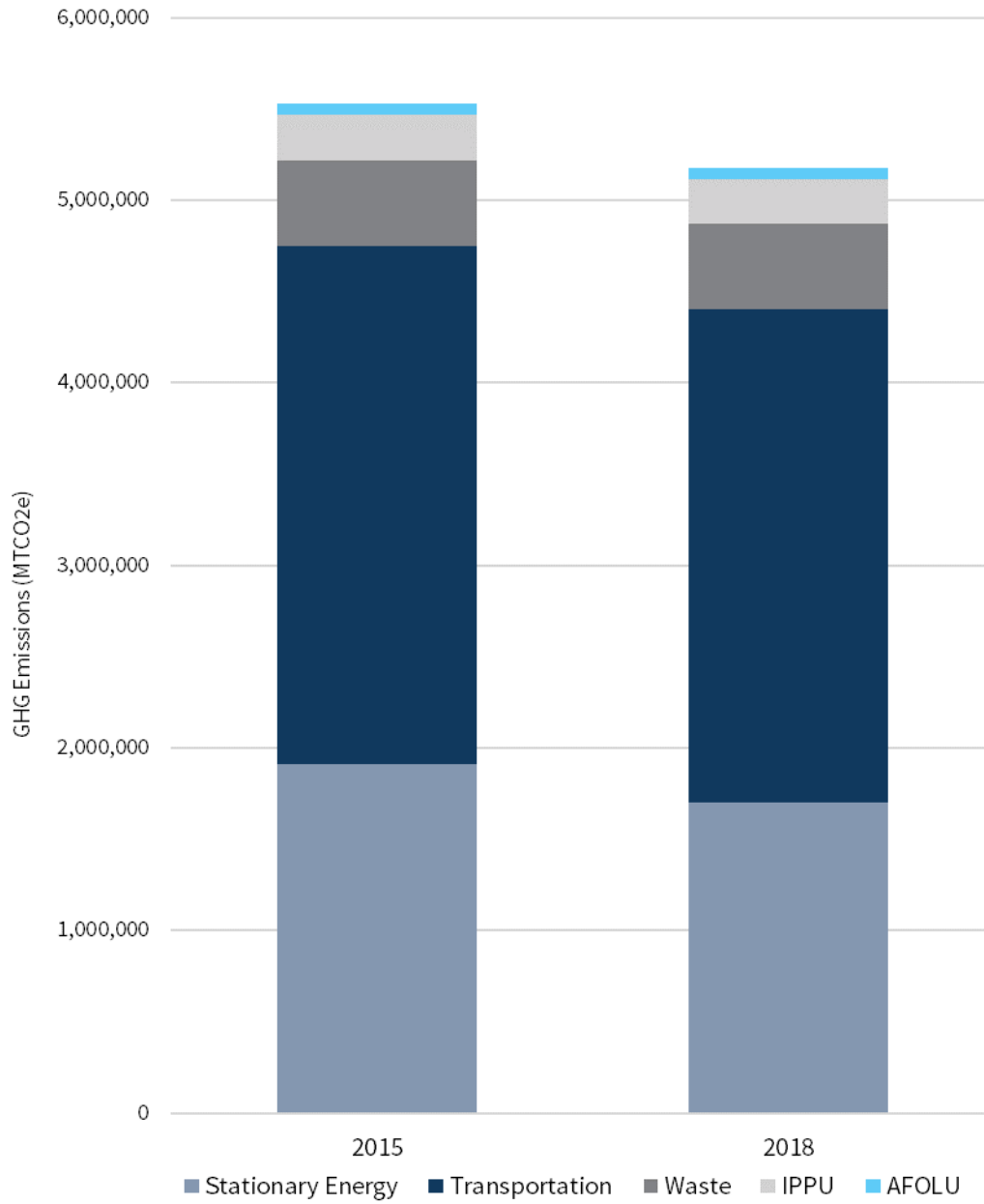


Figure A-5: 2015 and 2018 Emissions Inventory Comparison by Sector

A.2 1990 and 2010 Greenhouse Gas Inventory and Backcasting Methods

In 2015, the Los Angeles Regional Collaborative (LARC) and ICF International created a GHG emissions inventory for Los Angeles County using the 2013 ICLEI U.S. Community Protocol.⁴⁸ The 2010 inventory accounted for Scope 1 and 2 emissions using AR4 GWP values. Additionally, Scope 3 emissions were estimated for additional sub-categories—including water conveyance, and water supply, treatment and distribution—that are not accounted for in the 2015 and 2018 GHG inventories. The 2015 and 2018 GHG emissions inventory methods follow the GPC protocol, as discussed above. The 2015 and 2018 inventories include GHG emissions from industrial processes, product use, fugitive emissions from oil and natural gas systems, and other aggregate carbon dioxide sources that were not included in the 2010 inventory. **Table A-7** shows the differences in sub-sectors included in the two protocols and respective inventories.

Table A-7: Sectors and sub-sectors in ICLEI and GPC Protocol

2013 ICLEI US COMMUNITY PROTOCOL USED FOR 2010 INVENTORY	2019 GPC PROTOCOL USED FOR 2015 AND 2018 INVENTORY
<ul style="list-style-type: none"> • Transportation <ul style="list-style-type: none"> ○ On-Road Transportation ○ Off-Road Transportation and Equipment 	<ul style="list-style-type: none"> • Transportation <ul style="list-style-type: none"> ○ On-Road Transportation ○ Off-Road Transportation ○ Railways
<ul style="list-style-type: none"> • Building Energy • Stationary Sources 	<ul style="list-style-type: none"> • Stationary Energy <ul style="list-style-type: none"> ○ Buildings ○ Energy Industries ○ Agriculture, Forestry and Other Fishing Activities ○ Fugitive Emissions from Oil and Natural Gas Systems
<ul style="list-style-type: none"> • Solid Waste • Wastewater Treatment 	<ul style="list-style-type: none"> • Waste <ul style="list-style-type: none"> ○ Solid Waste ○ Biological Treatment of Solid Waste ○ Waste Incineration ○ Wastewater Treatment
<ul style="list-style-type: none"> • Agriculture (including livestock management) • Urban and Natural Forests (for informational purposes only) 	<ul style="list-style-type: none"> • AFOLU <ul style="list-style-type: none"> ○ Land and Land-use Change (including Urban and Natural Forests) ○ Aggregate sources and non-CO2 emission sources
<ul style="list-style-type: none"> • Water Conveyance • Water Supply, Distribution and Treatment (for informational purposes only) 	<ul style="list-style-type: none"> • IPPU <ul style="list-style-type: none"> ○ Product use

Due to differences in the two GHG protocols and accounting methods used for the 2010 inventory and the 2015 and 2018 inventories, it is not possible to directly compare emissions from each sector and

⁴⁸ ICLEI – Local Governments for Sustainability USA, *U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions*, Version 1.1, July 2013.

sub-sector. To monitor emissions reduction between 2010 and 2015/2018 and to ensure consistency with previous County commitments (dating back to 1990), the GPC protocol was used to develop a backcasting model for unincorporated County emissions. GHG emissions from each sector and sub-sector were scaled from 2015 to 1990 by using County and State parameters and datasets discussed in **Table A-8** below. Using the backcasting model, it is estimated that GHG emissions in 2015 are eight percent lower than 2010 and 14 percent lower than 1990. However, per-capita GHG emissions in 2015 are nine percent lower than 2010 and 21 percent lower than 1990 despite the increase in population, as illustrated in **Figure A-6**. 2018 emissions are estimated to be 14 percent below 2010 emissions and 20 percent below 1990 emissions; per-capita GHG emissions in 2018 are estimated to be 16 percent below 2010 emissions and 28 percent below 1990 emissions, illustrating a substantial decline in total emissions both at the aggregate level and at the per-capita level.

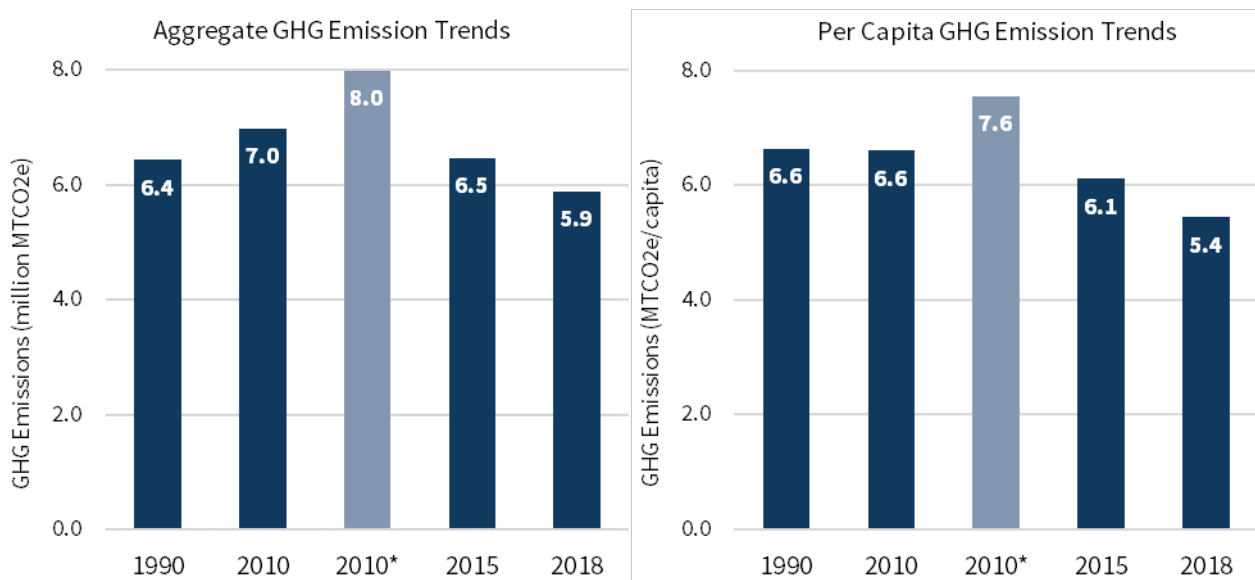


Figure A-6: 1990 to 2018 GHG Emissions Trends

* 2010 GHG emissions inventory reported in unincorporated Los Angeles County 2020 CCAP

Table A-8: Assumptions for Backcasting GHG Emissions to 2010 and 1990

SECTOR/SUB-SECTOR	BACKCASTING PARAMETERS
Transportation	3,450,566 (1990); 3,015,442 (2010)
On-Road Transportation	<ul style="list-style-type: none"> • VMT from on-road vehicles are estimated by interpolating VMT in unincorporated Los Angeles County for the years 2016 and 2040 as reported by Fehr & Peers using SCAG’s 2016 regional travel demand model. • Emission factors for on-road vehicles (including passenger vehicles, trucks, and buses) are estimated by linearly interpolating EMFAC2021 emission rates from 2000-2020 to extrapolate emission rates to 1990.
Railways	GHG emissions are assumed to be constant from 1990 to 2015.
Stationary Energy	2,226,141 (1990); 2,146,743 (2010)
Residential Buildings	Emissions from energy use in residential buildings are backcasted based on Countywide residential natural gas and electricity consumption as reported by CEC from 1990 to 2014.
Commercial and Institutional Buildings	Emissions from energy use in commercial buildings are backcasted based on Countywide non-residential natural gas and electricity consumption as reported by CEC from 1990 to 2014.
Manufacturing and Construction: Buildings	Emissions from energy use in commercial buildings are backcasted based on Countywide non-residential natural gas and electricity consumption as reported by CEC from 1990 to 2014.
Manufacturing and Construction: Equipment	<ul style="list-style-type: none"> • 2015 emissions from stationary equipment are scaled down using countywide GHG emissions based on construction and manufacturing jobs in unincorporated Los Angeles County. • GHG emissions are assumed to be constant from 1990 to 2015.
Energy Industries	GHG emissions for 1990-2010 are estimated as the average of reported emissions from 2011-2017.
Agriculture, Forestry and Other Fishing Activities	GHG emissions are assumed to be constant from 1990 to 2015.
Fugitive Emissions from Oil and Natural Gas Systems	GHG emissions are assumed to be constant from 1990 to 2015.
Waste	511,965 (1990); 564,503 (2010)
Solid Waste Disposal	<ul style="list-style-type: none"> • Emissions from organic waste disposal between 2010 and 2014 are scaled based on waste disposal tonnage reported by PW’s SWIMS database. • GHG emissions from 1990 to 2009 are backcasted based on population.
Biological Treatment of Solid Waste	<ul style="list-style-type: none"> • Emissions from biological treatment between 2010 and 2014 are scaled based on waste disposal tonnage reported by PW’s SWIMS database. • GHG emissions from 1990 to 2009 are backcasted based on population.
Waste Incineration	GHG emissions are assumed to be constant from 1990 to 2015.
IPPU	173,534 (1990); 243,456 (2010)
Product Use*	GHG emissions from 1990 to 2014 are backcasted based on population.
AFOLU	25,048 (1990); 60,860 (2010)
Land-use Change	Average land conversion rates from 2006-2015 were used to estimate emissions back to 2006. Emissions were assumed to be zero from 1990-2006.
Aggregate Sources and Non-CO ₂ Emissions Sources	GHG emissions are assumed to be constant from 1990 to 2015.

A.3 2018 to 2045 Business as Usual Forecasts

This section describes the approach for modeling business-as-usual (BAU) emissions, which represents future emissions based on current population and regional growth trends, land use growth patterns, and regulations or policies introduced before the 2018 baseline year. The BAU scenario demonstrates the growth in GHG emissions that would occur if no further action were to be taken by the County, State, or Federal Government after 2018.

The BAU forecast serves as a reference point for other forecasting scenarios, which include the Adjusted BAU that incorporates federal, State, and local actions (see CAP Appendix B: Adjusted Business as Usual Forecast and Emission Reduction Methods) and the GHG reductions from CAP implementation (see CAP Appendix B: GHG Reduction Measures and Actions). This section describes the BAU projections by sector, which are based on growth trends including current population and regional economic growth projections.

Additional details on the assumptions for each sector are included in the sections below. **Figure A-7** presents population and employment projections for the unincorporated County from 2015 to 2045.

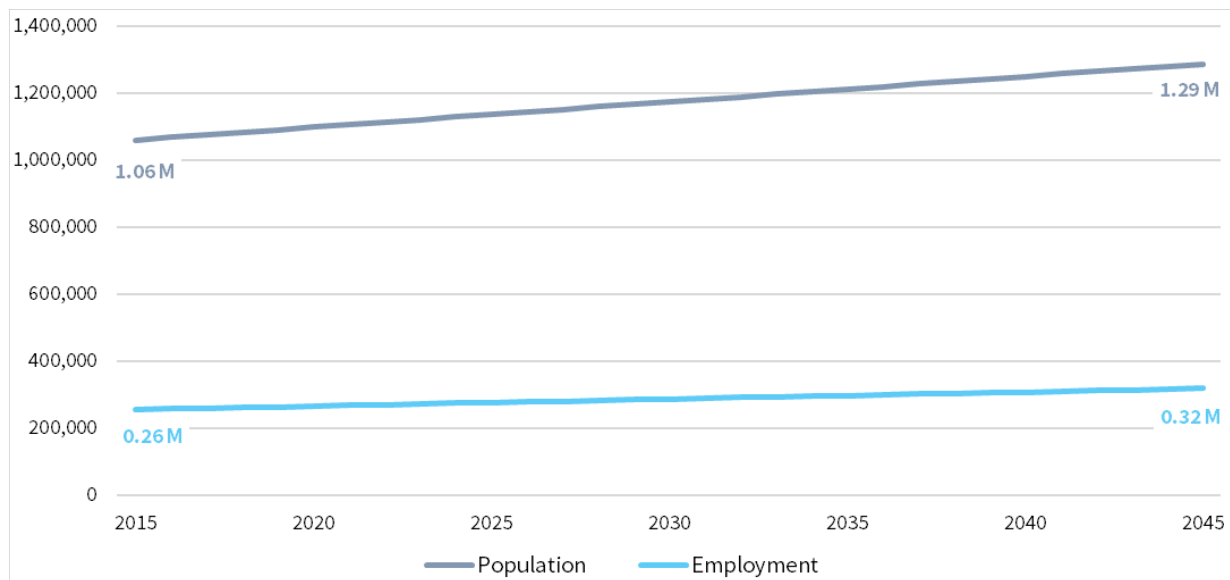


Figure A-7: Unincorporated Los Angeles County Population and Employment Projections

Stationary Energy

Table A-9 presents emissions for 2018 along with the BAU forecast for 2030, 2035, and 2045 for the stationary energy sector.

Table A-9: Stationary Energy GHG Emissions – 2018 Inventory and BAU Forecasts

STATIONARY ENERGY SUBSECTOR	ANNUAL GHG EMISSIONS (MTCO2E)			
	2018	2030	2035	2045
Residential Buildings	962,743	869,099	889,314	944,823
Commercial, Institutional, and Agricultural Buildings	349,373	429,107	441,191	469,816
Manufacturing and Construction Buildings	244,417	301,729	309,350	324,331
Energy Industries	98,554	29,495	29,526	29,587
Fugitive Emissions from Oil and Natural Gas Systems	41,066	49,130	49,251	49,493
Agriculture, Forestry and Other Fishing Activities	2,658	2,600	2,580	2,562
TOTAL	1,698,809	1,681,160	1,721,212	1,820,612

Residential Buildings

Energy consumption (electricity and natural gas) in residential buildings is forecasted based on building footprint projections for residential building stock in unincorporated Los Angeles County. Building footprint projections are based on historical trends from Los Angeles County Assessor Parcel Database (2006-2018).⁴⁹ In 2019, residential customers in unincorporated Los Angeles County were enrolled in CPA’s Clean Power rate option (50% eligible renewable), leading to an initial decline in residential building emissions through 2025, before they rise in 2030, 2035, and 2045 alongside population and economic growth. For purposes of the BAU projections it is assumed that CPA customers in unincorporated areas continue to receive 50 percent eligible renewable electricity until 2045 and the remaining customers continue to receive electricity from SCE with the emissions factors and participation rates held constant. GHG emissions in 2019 are calculated using 2018 natural gas and electricity emission factors with 2019 CPA participation rates. GHG emissions between 2020-2045 are calculated using 2020 electricity emission factors.

Data Sources:

- SCE Emission Factor
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission Factor
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report (July 28, 2021)
Provided by CPA via LA County CSO
- Climate Registry Information System (CRIS)
Link: [https://cris4.org/\(S\(zr3twbbnour5a5jfb1iykcx\)\)/frmLLLogin.aspx](https://cris4.org/(S(zr3twbbnour5a5jfb1iykcx))/frmLLLogin.aspx)

⁴⁹ UCLA Institute of Environmental Studies, Analysis of Los Angeles County Parcel Assessor’s Data. 2018.

- UCLA analysis of Los Angeles County Parcel Assessor’s Data
Provided by UCLA Institute of Environmental Studies

Commercial and Institutional Buildings

Energy consumption in commercial, institutional, and agricultural buildings is forecasted based on building footprint projections for non-residential building stock in unincorporated Los Angeles County. Commercial and Institutional building footprint projections are based on historical trends from the Los Angeles County Assessor Parcel Database (2006-2018). In June 2018, non-residential customers in unincorporated Los Angeles County were enrolled in CPA’s Clean Power option. Under this program, over 95% of non-residential customers started receiving 50 percent eligible renewable electricity from CPA. For purposes of the BAU projections it is assumed that CPA customers in unincorporated areas continue to receive 50 percent eligible renewable electricity until 2045 and the remaining customers continue to receive electricity from SCE with the emissions factors and participation rates held constant. GHG emissions in 2019 are calculated using 2018 natural gas and electricity emission factors with 2019 CPA participation rates. GHG emissions between 2020-2045 are calculated using 2020 electricity emission factors. GHG emissions from agricultural buildings are assumed to remain constant.

Data Sources:

- SCE Emission Factor
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission Factor
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- UCLA analysis of Los Angeles County Parcel Assessor’s Data
Provided by UCLA Institute of Environmental Studies

Manufacturing and Construction Buildings

ELECTRICITY AND NATURAL GAS

Energy consumption (electricity and natural gas) in manufacturing and industrial buildings is forecasted based on building footprint projections for non-residential building stock in unincorporated Los Angeles County. Building footprint projections are based on historical trends from Los Angeles County Assessor Parcel Database (2006-2018).⁵⁰ In June 2018, non-residential customers in unincorporated Los Angeles County were enrolled in CPA’s Clean Power option. Under this program, over 95% of non-residential customers started receiving 50 percent eligible renewable electricity from CPA. For purposes of the BAU projections it is assumed that CPA customers in unincorporated areas continue to receive 50 percent eligible renewable electricity until 2045 and the remaining customers continue to receive electricity from SCE with the emissions factors and participation rates held constant. GHG emissions in 2019 are calculated using 2018 natural gas and electricity emission factors

⁵⁰ UCLA Institute of Environmental Studies, Analysis of Los Angeles County Parcel Assessor’s Data. 2018.

with 2019 CPA participation rates. GHG emissions between 2020-2045 are calculated using 2020 electricity emission factors.

OFF-ROAD EQUIPMENT

Countywide GHG emissions from off-road equipment used in the manufacturing and construction sector are obtained from CARB's OFFROAD2017 ORION tool.⁵¹ The tool provides countywide carbon dioxide emissions and annual gasoline and diesel consumption by off-road equipment to 2045. Emission projections for unincorporated Los Angeles County are estimated by scaling countywide emissions using construction and manufacturing jobs in 2017 for unincorporated County areas.

Data Sources:

- CARB OFFROAD2017 ORION
Link: <https://www.arb.ca.gov/orion/>
- Jobs in Manufacturing and Construction
Link: <https://scag.ca.gov/sites/main/files/file-attachments/losangelescountyjp.pdf?1605653130>
- UCLA analysis of Los Angeles County Parcel Assessor's Data
Provided by UCLA Institute of Environmental Studies

Energy Industries

Emission projections from energy production at CHP plants, district cooling facilities, biomass power stations, and waste-to-energy facilities, are extrapolated based on 2008 to 2020 GHG emissions reported by the CARB Pollution Mapping Tool and the CARB 2021 MRR Database.⁵² For CHP facilities, emissions for Pichess cogeneration station were assumed to remain constant (the facility was decommissioned in 2018); emissions for Olive View cogeneration station were forecasted using a linear trend in emissions from reported 2012-2020. Waste-to-energy facility biogenic emissions for 2019-2029 were forecasted using a linear trend in emissions reported from 2011-2018 and emission for 2030-2045 were forecasted assuming the Calabasas landfill shuts down and the remaining emissions decline following the trend from 2011 through the forecasting year. Biomass and auxiliary power facility biogenic emissions were forecasted using a linear trend in emissions reported from 2011-2018.

Data Sources:

- CARB Pollution Mapping Tool
Link: https://www.arb.ca.gov/ei/tools/pollution_map/
- CARB MRR Database
Link: <https://ww2.arb.ca.gov/mrr-data>

⁵¹ CARB, OFFROAD ORION. 2018. Available at: <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools>. Accessed January 2021.

⁵² CARB, Mandatory GHG Reporting Regulations. April 1, 2019. Available at: <https://ww2.arb.ca.gov/mrr-regulation>. Accessed January 2021.

Agriculture, Forestry and Other Fishing Activities

Countywide GHG emissions from agricultural equipment are obtained from CARB’s OFFROAD2017 ORION tool. The tool provides countywide carbon dioxide emissions and annual gasoline and diesel consumption by off-road equipment to 2045. Emission projections for unincorporated Los Angeles County are estimated by scaling countywide emissions using 2016 crop acreage for the unincorporated County from USDA’s NASS Cropscape database.⁵³

Data Sources:

- CARB OFFROAD2017 ORION
Link: <https://www.arb.ca.gov/orion/>
- USDA NASS Cropscape
Link: <https://nassgeodata.gmu.edu/CropScape/>

Fugitive Emissions from Oil and Natural Gas Systems

Emissions from extraction, processing, and distribution of crude oil and natural gas, are extrapolated based on 2008 to 2018 GHG emissions reported by the CARB Pollution Mapping Tool.⁵⁴

Data Sources:

- CARB Pollution Mapping Tool
Link: https://www.arb.ca.gov/ei/tools/pollution_map/

Transportation

Table A-10 presents emissions for 2018 along with the BAU forecast for 2030, 2035, and 2045 for the transportation sector.

Table A-10: Transportation GHG Emissions – 2018 Inventory and BAU Forecasts

TRANSPORTATION SUBSECTOR	ANNUAL GHG EMISSIONS (MTCO2E)			
	2018	2030	2035	2045
Passenger Vehicles	2,665,824	2,738,675	2,769,029	2,829,737
Buses	29,371	35,589	35,676	35,852
Railways	9,490	10,255	10,389	10,658
TOTAL	2,704,685	2,784,518	2,815,094	2,876,247

⁵³ NASS, CropScape. 2021. Available at: <https://nassgeodata.gmu.edu/CropScape/>. Accessed January 2021.

⁵⁴ CARB, Pollution Mapping Tool. 2018. Available: https://ww3.arb.ca.gov/ei/tools/pollution_map/. Accessed January 2021.

On-road Transportation: Passenger Vehicles and Trucks

VMT from passenger vehicles and trucks were estimated using SCAG's 2016 Regional Travel Demand Model, which forecasts VMT for the year 2040. This model is a trip-based travel forecasting model that generates daily vehicle trips for each TAZ across various trip purposes based on inputs such as the transportation network and socioeconomic data such as population, household, and employment. VMT was provided by F&P for years 2016 and 2040 and was linearly interpolated for 2030 and 2035. VMT for years 2041 through 2045 were linearly extrapolated based on the 2016 to 2040 VMT projection.

GHG emissions from unincorporated areas are calculated using VMT and the weighted emission factors for 2018 by vehicle type (passenger vehicles and trucks)⁵⁵ from the EMFAC2021 model (see transportation section of A.1 above for discussion).⁵⁶ The 2018 emission factor was applied to every year from 2018 through 2045 to represent no changes in the vehicle fleet due to federal, state, or local action.

Data Sources:

- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>
- SCAG Regional Travel Demand Model
Provided by SCAG
- Fehr & Peers Modeling Analysis (July 29, 2019; December 2021; January 2022)

On-road Transportation: Buses

Emissions for 2015 and 2018 were calculated using fuel consumption data from FTA's NTD⁵⁷ and standard emission factors for diesel, gasoline, and compressed natural gas from EMFAC2021.⁵⁸

Emissions from Metro buses are extrapolated from 2018 through 2045 based on Metro's bus miles and ridership statistics between 2010 and 2017.⁵⁹

Data Sources:

- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>
- Metro Bus Ridership
Link: <https://isotp.metro.net/MetroRidership/Index.aspx>
- FTA National Transit Database
Link: <https://www.transit.dot.gov/ntd/ntd-data>

⁵⁵ Passenger vehicles correspond to EMFAC categories LDA, LDT1, LDT2, MCY, and MD. Trucks correspond to EMFAC categories LHDT1, LHDT2, MHDT, HHDT, and MH.

⁵⁶ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

⁵⁷ FTA, National Transit Database. 2018. Available at: <https://www.transit.dot.gov/ntd/ntd-data>. Accessed January 2021.

⁵⁸ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

⁵⁹ Metro, Interactive Estimated Ridership Stats. 2021. Available at: <https://isotp.metro.net/MetroRidership/Index.aspx>. Accessed January 2021.

Railways

Emissions by Southern California Regional Rail Authority (SCRRA or Metrolink) are forecasted based on projected weekday ridership until 2025 as documented in Metrolink’s 10 Year Strategic Plan. Emissions from 2025 to 2045 are extrapolated based ridership estimates between 2014 and 2025. Emissions from Metro Rail are extrapolated based on Metro rail miles and ridership statistics between 2010 and 2017.⁶⁰

Data Sources:

- Metrolink Strategic Plan
Link: https://www.metrolinktrains.com/globalassets/about/metrolink_10-year_strategic_plan_2015-2025.pdf
- Metro Ridership
Link: <http://isotp.metro.net/MetroRidership/Index.aspx>

Waste and Wastewater

BAU emissions are forecasted for years 2018 through 2045 for emissions generated at landfills, biological treatment (composting and anaerobic digestion) and incineration facilities, and wastewater treatment plants are reported under the waste sector. **Table A-11** presents emissions for 2018 along with the BAU forecast for 2030, 2035, and 2045 for the waste and wastewater sector.

Table A-11: Waste and Wastewater GHG Emissions – 2018 Inventory and BAU Forecast

WASTE & WASTEWATER SUBSECTOR	ANNUAL GHG EMISSIONS (MTCO ₂ E)			
	2018	2030	2035	2045
Solid Waste Disposal	407,578	386,285	386,541	410,702
Biological Treatment of Solid Waste	5,309	6,180	6,184	6,579
Waste Incineration*	547	647	687	711
Wastewater Treatment	56,495	59,454	61,372	65,208
TOTAL	469,382	451,919	454,097	482,489

Note: Totals exclude Waste Incineration which is accounted for under Stationary Energy

Solid Waste Disposal

Emissions from landfills are determined by extrapolating the 2018 GHG emissions intensity (MTCO₂e/person) based on solid waste and organic waste disposal projections from the Public Works

⁶⁰ FTA, National Transit Database. 2018. Available at: <https://www.transit.dot.gov/ntd/ntd-data>. Accessed January 2021.

SWIMS database⁶¹ and population projections by SCAG⁶² and Caltrans.⁶³ Solid waste diversion rate and organics diversion rate are assumed to remain constant at 70% and 38% respectively, as is the future methane capture rates at all landfills.

Data Sources:

- LADPW SWIMS Database
Link: <https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx>
- SCAG Population Projections
Link: <http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting>
- Caltrans Population Projections
Link: <https://www.shastaedc.org/wp-content/uploads/2018/07/CalTrans-2017-2050.pdf>

Biological Treatment of Solid Waste

Emissions from composting and anaerobic digestion are estimated by extrapolating the 2018 GHG emissions intensity (MTCO₂e/person) based on solid waste and organic waste disposal projections from Public Works SWIMS database.⁶⁴ Solid waste diversion rate and proportion of organic waste diverted from landfills to composting and grinding/mulching facilities remains constant.

GHG emissions from Anaerobic Digestion at JWPCP are scaled based on population growth from 2018 to 2045. These emission projections are reported under Energy Industries.

Data Sources:

- LADPW SWIMS Database
Link: <https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx>

Waste Incineration

See Energy Industries.

Wastewater Treatment

Emissions from wastewater treatment are determined by extrapolating the 2018 GHG emissions intensity (MTCO₂e/person) based on population projections by SCAG⁶⁵ and Caltrans.⁶⁶

⁶¹ LADPW, Solid Waste Information Management System (SWIMS). 2021. Available at: <https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx>. Accessed January 2021.

⁶² SCAG, Growth Forecasting. 2018. Available at: <https://scag.ca.gov/data-tools-geographic-information-systems>. Accessed January 2021.

⁶³ Caltrans, California County-Level Economic Forecast 2017-2050. September 2017. Available at: <https://www.shastaedc.org/wp-content/uploads/2018/07/CalTrans-2017-2050.pdf>. Accessed January 2021.

⁶⁴ LADPW, Solid Waste Information Management System (SWIMS). 2021. Available at: <https://dpw.lacounty.gov/epd/swims/OnlineServices/reports.aspx>. Accessed January 2021.

⁶⁵ SCAG, Growth Forecasting. 2018. Available at: <https://scag.ca.gov/data-tools-geographic-information-systems>. Accessed January 2021.

⁶⁶ Caltrans, California County-Level Economic Forecast 2017-2050. September 2017. Available at: <https://www.shastaedc.org/wp-content/uploads/2018/07/CalTrans-2017-2050.pdf>. Accessed January 2021.

Data Sources:

- SCAG Population Projections
Link: <http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting>
- Caltrans Population Projections
Link: <https://www.shastaedc.org/wp-content/uploads/2018/07/CalTrans-2017-2050.pdf>

Industrial Processes and Product Use

HFC and PFC emissions from the use of foam, solvents and industrial refrigerants, aerosols, fire retardants and refrigerants in residential and transportation sectors are extrapolated based on population projections by SCAG⁶⁷ and Caltrans.⁶⁸ It is assumed that per capita emissions from products remain constant between 2018 to 2045. **Table A-12** presents emissions for 2018 along with the BAU forecast for 2030, 2035, and 2045 for the IPPU sector.

Table A-12: IPPU GHG Emissions – 2018 Inventory and BAU Forecast

SECTOR	ANNUAL GHG EMISSIONS (MTCO2E)			
	2018	2030	2035	2045
IPPU	239,505	259,605	267,981	284,731
TOTAL	239,505	259,605	267,981	284,731

Data Sources:

- SCAG Population Projections
Link: <http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting>
- Caltrans Population Projections
Link: <https://www.shastaedc.org/wp-content/uploads/2018/07/CalTrans-2017-2050.pdf>

AFOLU

GHG Emissions are assumed to be constant between 2018 to 2045. **Table A-13** presents emissions for 2018 along with the BAU forecast for 2030, 2035, and 2045 for the AFOLU sector.

Table A-13: AFOLU GHG Emissions – 2018 Inventory and BAU Forecast

SECTOR	ANNUAL GHG EMISSIONS (MTCO2E)			
	2018	2030	2035	2045
AFOLU	60,860	60,860	60,860	60,860
TOTAL	60,860	60,860	60,860	60,860

⁶⁷ SCAG, Growth Forecasting. 2018. Available at: <https://scag.ca.gov/data-tools-geographic-information-systems>. Accessed January 2021.

⁶⁸ Caltrans, California County-Level Economic Forecast 2017-2050. September 2017. Available at: <https://www.shastaedc.org/wp-content/uploads/2018/07/CalTrans-2017-2050.pdf>. Accessed January 2021.

Summary Emissions

Table A-14 and **Figure A-8** present GHG emissions for all sectors for the 2018 GHG inventory and the 2030, 2035, and 2045 BAU forecasts.

Table A-14: GHG Emissions by Sector – 2018 Inventory and BAU Forecast

SECTOR	ANNUAL GHG EMISSIONS (MTCO2E)			
	2018	2030	2035	2045
Stationary Energy	1,698,809	1,681,160	1,721,212	1,820,612
Transportation	2,704,685	2,784,518	2,815,094	2,876,247
Waste	469,382	451,919	454,097	482,489
IPPU	239,505	259,605	267,981	284,731
AFOLU	60,860	60,860	60,860	60,860
TOTAL	5,173,240	5,238,062	5,319,243	5,524,939

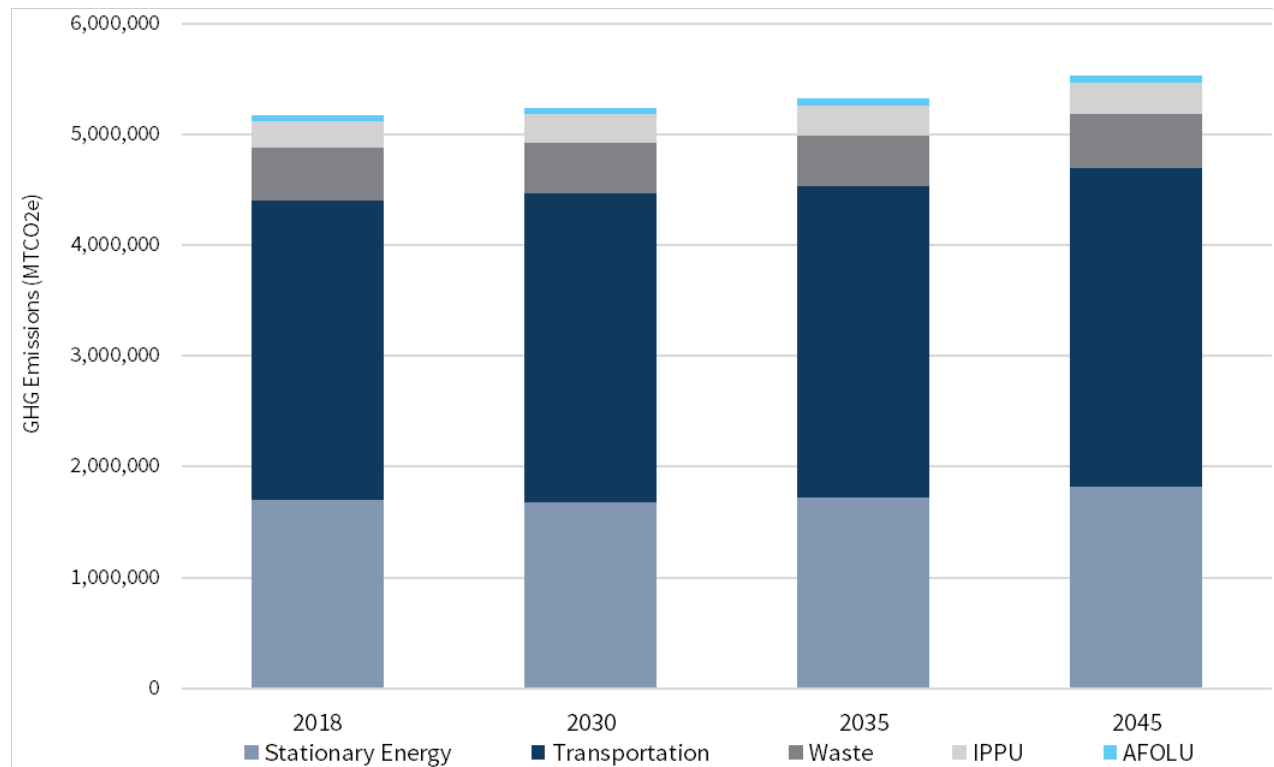


Figure A-8: GHG Emissions by Sector – 2018 Inventory and BAU Forecast

A.4 Derivation of the 2045 CAP's Emission Reduction Targets

Origin of Emission Reduction Targets

The 2045 CAP includes three separate targets for three future milestone years:

- By 2030, reduce County GHG emissions 40 percent below 2015 baseline levels;
- by 2035, reduce County GHG emissions 50 percent below 2015 baseline levels; and
- by 2045, achieve carbon neutrality in unincorporated Los Angeles County (long-term aspirational target).

The 2045 CAP's targets are based on the OurCounty Sustainability Plan; this is a primary objective of the 2045 CAP (to align with the OurCounty Sustainability Plan targets). 2015 was selected as the baseline year because 2015 was latest calendar year for which reliable, accurate, and complete emissions activity data was available when the OurCounty Sustainability Plan was prepared, including account-level energy consumption data from the UCLA Energy Atlas. During the development of OurCounty, the County evaluated a series of GHG reduction target options. The targets selected represent the County's commitment to doing its fair share to help California achieve its ambitious statewide GHG targets.

In 2005, Governor Arnold Schwarzenegger's Executive Order (EO) S-3-05 established the 2050 statewide GHG reduction target of 80 percent below 1990 levels, expressing the intent of the State to address the issue of climate change by reducing GHGs. Following EO S-3-05, the California legislature passed Assembly Bill 32 (AB 32, Health and Safety Code § 38500, et seq.) in 2006. AB 32 requires the CARB to design and implement feasible and cost-effective emissions limits, regulations, and other measures, such that statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions). In 2015, Governor Edmund G. Brown, Jr.'s EO B-30-15 established the 2030 statewide GHG reduction target of 40 percent below 1990 levels. In 2016, Senate Bill (SB) 32 and its companion bill AB 197 amended the Health and Safety Code by establishing a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and included provisions to ensure the benefits of State climate policies accrue to disadvantaged communities. Further, in 2018, Governor Brown signed EO B-55-18, committing California to total, economy-wide carbon neutrality by 2045. In December 2017, CARB approved the 2017 Climate Change Scoping Plan Update (2017 Scoping Plan), which outlines the proposed framework of action for achieving the 2030 GHG target of 40 percent reduction in GHG emissions relative to 1990 levels as codified by SB 32 (CARB 2017).

Table A-15 outlines the State’s GHG reduction targets.

Table A-15: State of California Greenhouse Gas Emission Reduction Targets

TARGET YEAR	STATE GHG TARGET	CORRESPONDING STATE LEGISLATION
2020	1990 levels	Assembly Bill 32, the California Global Warming Solutions Act (2006)
2030	40% below 1990 levels	Senate Bill 32, the Global Warming Solutions Act (2006)
2045	Carbon neutrality ^a	Executive Order B-55-18 (2018)
2050	80% below 1990 levels	Executive Order S-3-05 (2005)

NOTES:
^a. Carbon neutrality means “net zero” emissions of GHGs. In other words, it means that GHG emissions generated by sources such as transportation, power plants, and industrial processes must be less than or equal to the amount of carbon dioxide that is sequestered in natural sinks and through mechanical means of the same time period.

The 2045 CAP retains OurCounty’s target for 2035 and identifies OurCounty’s 2045 carbon neutrality target as a long-term aspirational goal. The 2045 CAP also adds a new GHG emission reduction target for 2030 to align with SB 32.⁶⁹ The Draft 2045 CAP’s 2030 target was selected based on guidance provided in the 2017 Scoping Plan and was developed to demonstrate consistency with the statewide 2030 target shown in Table A-15, above. The Draft 2045 CAP’s 2030 target is established based on a reduction from 2015 baseline levels (just like the OurCounty targets for 2025 and 2035) and is equal to 40% below 2015 emissions or 4.9 million MTCO₂e. This compares to the County’s 2030 BAU forecast of 5.2 million MTCO₂e, as presented in Table A-14 above. A 40% reduction below 2015 levels is also equivalent to a 48% reduction below the County’s 1990 GHG emissions levels, which is more stringent than the state target of a 40% reduction below 1990 levels by 2030 (for additional discussion, see section below).

The Draft 2045 CAP’s 2035 target was selected based on guidance provided in the 2017 Scoping Plan and was chosen as an interim milestone target to put the County on the trend to achieve a long-term aspirational goal of carbon neutrality by 2035. This interim target was developed to demonstrate consistency with the pathway needed to achieve the statewide 2045 target shown in Table 2-4, above. The Draft 2045 CAP’s 2035 target is established based on a reduction from 2015 baseline levels and is equal to 50% below 2015 emissions (2.8 million MTCO₂e). This compares to the County’s 2035 BAU forecast of 5.3 million MTCO₂e. A 50% reduction below 2015 levels is also equivalent to a 57% reduction below the County’s 1990 GHG emissions levels.

Table A-16 presents a comparison between the 2045 CAP’s targets for 2030 and 2035, along with its aspirational 2045 goal, and the OurCounty Sustainability Plan targets for each future milestone year.

⁶⁹ The 2045 CAP excludes OurCounty’s 2025 target because implementation of the CAP will barely be underway by 2025. Instead, the 2045 CAP focuses on the closest reasonable target timeframes of 2030 and 2035, and also to align with state planning for 2030 (SB 32 does not stipulate an interim target for 2025).

Table A-16: GHG Emissions Targets and Goals for the Draft 2045 Cap and OurCounty Sustainability Plan

YEAR	2045 CAP (UNINCORPORATED COUNTY ONLY)	OURCOUNTY SUSTAINABILITY PLAN (UNINCORPORATED COUNTY AND CITIES)	GHG EMISSIONS (MTCO ₂ E) (UNINCORPORATED COUNTY)
2025	n/a	25% below 2015 baseline levels	4,148,366
2030	40% below 2015 levels	n/a	3,318,693
2035	50% below 2015 levels	50% below 2015 levels	2,765,578
2045	Carbon neutrality ^a	Carbon neutrality by 2045 for county operations (by 2050 countywide)	0

NOTE:
a. The Draft 2045 CAP includes an aspirational goal, rather than a target, of carbon neutrality by 2045.

The Targets as Levels of Significance for GHG Impacts under CEQA

CEQA Guidelines Section 15183.5(b) stipulates that project-specific environmental documents can find that project-level GHG emissions are not cumulatively considerable if the project complies with the requirements of a qualified GHG emissions reduction plan. As discussed in the Draft Environmental Impact Report for the 2045 CAP, upon certification of the EIR and approval of the 2045 CAP, the 2045 CAP would meet the requirements of a qualified GHG emission reduction plan per CEQA Guidelines Section 15183.5(b)(1) for projects through 2035.

To meet the requirements of CEQA Guidelines Section 15183.5(b), a qualified GHG emissions reduction plan must include several important elements, and must:

Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable (§ 15183.5(b)(1)(B)).

The Draft 2045 CAP identifies a GHG emissions reductions target for the year 2030 that is 40% below baseline 2015 levels, which is equivalent to 47% below 1990 levels. This 2030 target for the unincorporated areas of the County is more stringent than the statewide target of 40% below 1990 levels by 2030 pursuant to SB 32. The Draft 2045 CAP’s 2035 target of 50% below 2015 levels puts the County on a pathway to achieve the statewide 2045 target as stipulated in EO B-55-18. The 2045 CAP’s long-term aspirational goal of carbon neutrality by 2045 is also consistent with EO B-55-20, while the interim 2035 target puts the County on a path to achieve carbon neutrality.

Consistency with State Target as a Threshold of Significance

While several State-level initiatives will help reduce GHG emissions, they alone will not be sufficient to meet the 2030 target mandated by SB 32. This is one of the many reasons why the County has prepared the 2045 CAP: so it can contribute its fair share of emission reductions to achieve the statewide targets for 2030 and beyond.

As discussed above, the Draft 2045 CAP's 2030 target of 40% below 2015 levels (a gross emissions target) exceeds the statewide 2030 target as codified in SB 32 and the 2017 Scoping Plan. The County's emissions in 2015 are estimated to be 12% lower than 1990 emissions;⁷⁰ this compares to statewide emissions that were 2.3% higher in 2015 compared to 1990.⁷¹ Additionally, the County's emissions in 2018 are estimated to be 20% lower than 1990 emissions; this compares to statewide emissions that were 1.3% lower in 2018 compared to 1990.⁷² In other words, the County has been more successful than the state as a whole in reducing gross emissions since 1990. Consequently, the Draft 2045 CAP's gross emissions target is *more* stringent than the corresponding state target when comparing to 1990 levels and approximately equivalent when using a per-capita metric.⁷³ The Draft 2045 CAP's 2030 target also sets the County on a path to achieve California's 2045 and 2050 GHG emission reduction targets in EO B-55-18 and EO S-3-05. There is currently no State plan to achieve state GHG reduction targets beyond 2030,

Consistency with the 2017 Scoping Plan and SB 32 is an appropriate metric by which to determine the significance of the Draft 2045 CAP's GHG emissions. CEQA Guidelines Section 15064.4(b)(3) states that a lead agency "may consider a project's consistency with the State's long-term climate goals or strategies" when determining the significance of a project's impacts. Additionally, in *Center for Biological Diversity v. Department of Fish and Wildlife* (2015) 62 Cal.4th 204 (Newhall), the California Supreme Court sanctioned the use of such a threshold by stating that assessing a project's GHG impacts based on a "consistency with a GHG emission reduction plan" threshold of significance is legally permissible under CEQA. The 2030 unincorporated County target above is derived using the 2017 Scoping Plan's recommendations for local land use development to contribute their "fair share" of emission reductions to the statewide GHG target for 2030. This is also consistent with the Association of

⁷⁰ To demonstrate consistency with statewide targets, to assess the County's progress since 1990, and to ensure that interim emissions reduction targets align with commitments prior to 2015, a backcasting model was developed (see section A.2 of this appendix).

⁷¹ California Air Resources Board, *California's Greenhouse Gas Inventory by Scoping Plan Category*, Fourteenth Edition: 2000 to 2019, Last updated on 6/1/2021. Available at: <https://ww2.arb.ca.gov/ghg-inventory-data>. Accessed January 2022.

⁷² *Ibid.*

⁷³ Per-capita emissions for the unincorporated County are 19 percent lower in 2015 (6.1 MTCO₂e/capita) compared to 1990 (7.6 MTCO₂e/capita) and 28 percent lower in 2018 (5.4 MTCO₂e/capita) compared to 1990. This compares to total statewide per-capita emissions that were 22 percent lower in 2015 (11.3 MTCO₂e/capita) compared to 1990 (14.5 MTCO₂e/capita) and 26 percent lower in 2018 (10.8 MTCO₂e/capita) compared to 1990. The 2030 statewide target of 6.2 MTCO₂e/capita is 57 percent below 1990 statewide levels, whereas the 2045 CAP's 2030 target of 3.3 MTCO₂e/capita is 56 percent below 1990 County levels.

Environmental Professionals (AEP) 2016 white paper recommendation for “Substantial Progress” thresholds for land use development to show consistency with statewide targets.⁷⁴

Therefore, the Draft 2045 CAP’s 2030 target represents the level below which GHG emissions would not be cumulatively considerable. The Draft 2045 CAP also puts the County on a path to achieve its 2035 target of 50% below 2015 levels and its long-term aspirational target of carbon neutrality by 2045.

The Draft 2045 CAP’s 2035 target of 50% below 2015 levels puts the County on a pathway to achieve the statewide 2045 target as stipulated in EO B-55-18. Although the state does not have a target for 2035, the 2045 CAP’s target for 2035 of 50% below 2015 levels is equivalent to a 57% reduction below 1990 levels, which puts the county on a path to achieve carbon neutrality by 2045. Consequently, pursuant to CEQA Guidelines section 15064.4(b)(3), the Draft 2045 CAP’s 2035 target represents the level below which GHG emissions would not be cumulatively considerable in the year 2035.

GHG emissions and global climate change represent cumulative impacts of human activities and development projects locally, regionally, statewide, nationally, and worldwide. GHG emissions from all these sources cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects around the world have contributed and will continue to contribute to global climate change and its associated environmental impacts. Given that analysis of GHG emissions is cumulative in context, the emissions targets discussed above represent the level by which the 2045 CAP’s emissions are not cumulatively considerable.

⁷⁴ Association of Environmental Professionals (AEP). 2016, *Final White Paper - Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*, October 18. Available at: https://califaep.org/docs/AEP-2016_Final_White_Paper.pdf. Accessed December 2021.

A.5 Attachment A: Fehr & Peers Modeling Analysis

APPENDIX B

Emissions Forecasting and Reduction Methods

Purpose

This Appendix describes the greenhouse gas (GHG) accounting and projection methods for the Adjusted Business-as-Usual (BAU) forecasts for 2030, 2035, and 2045; and the calculation methods for quantifying GHG emission reductions for the 2045 CAP's emission reduction measures and actions.

Section B.1: 2018 to 2045 Adjusted Business as Usual Forecasts

This section describes the approach for modelling an Adjusted BAU scenario which projects future emissions based on current population and regional growth trends, land use growth patterns, and implementation of Federal, State, and County regulations and policies including renewable energy targets pursuant to the California Renewable Portfolio Standard (RPS) and Senate Bill (SB) 100, Title 24 Building Energy Efficiency updates, and the Advanced Clean Cars (ACC) and Pavley vehicle efficiency standards.

Section B.2: GHG Reduction Measures and Actions

This section describes the calculation methods for estimating local GHG emission reductions for the 2045 CAP measures and actions. These emission reductions occur beyond Federal, State, and County regulations and policies accounted for in the Adjusted BAU forecast. The quantified measures and actions include:

- ES1: Develop a Sunset Strategy for All Oil and Gas Operations
- ES2: Procure Zero-Carbon Electricity
- E1: Transition Existing Buildings to All-Electric
- E2: Standardize All-Electric New Development
- E4: Improve Energy Efficiency of Existing Buildings
- ES3: Increase Renewable Energy Production
- E6: Reduce Indoor & Outdoor Water consumption
- T1: Increase Density Near High-Quality Transit Areas
- T2: Develop Land Use Plans Addressing Jobs/Housing Balance & Increase Mixed Use
- T3: Expand Bicycle & Pedestrian Network to Serve Residential, Employment, & Recreational Trips
- T4: Broaden Options for Transit, Active Transportation, & Alternative Modes of Transportation
- T6: Increase ZEV Market Share and Reduce Gasoline and Diesel Fuel Sales
- T7: Electrify County Fleet Vehicles
- T8: Accelerate Freight Decarbonization
- T9: Expand Use of Zero-Emission Technologies for Off-Road Vehicles & Equipment
- W1: Institutionalize Sustainable Waste Systems & Practices
- W2: Increase Organic Waste Diversion
- A1: Conserve Agricultural and Working Lands, Forest Lands, and Wildlands
- A3: Expand the County's Tree Canopy & Green Spaces

B.1 2018 to 2045 Adjusted Business-as-usual Forecasts

Like the standard BAU forecast, the Adjusted BAU forecast provides an estimate of future emission levels based on the continuation of existing trends in demographic growth (such as population and housing), activity or resource consumption (such as electricity use), technology changes, and regulation. Unlike the BAU forecast, the Adjusted BAU forecast accounts for expected outcomes of Federal, State, and local measures. Specifically, the Adjusted BAU forecast includes the following programs and policies:

1. California's Renewable Portfolio Standard (RPS) program and Senate Bill 100 (SB100) targets for renewable energy;
2. Updates to Title 24 standards;
3. Implementation of the Advanced Clean Cars and Pavley regulations;

Each of these three adjustments are explained in the following sections.

Renewable Portfolio Standard and Senate Bill 100

The Clean Energy and Pollution Reduction Act of 2015, or Senate Bill 350 (Chapter 547, Statutes of 2015) was approved by Governor Brown on October 7, 2015. SB 350 increased the standards of the California Renewable Portfolio Standards (RPS) program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased from 33 percent to 50 percent by December 31, 2030. On September 10, 2018, Governor Brown signed SB 100, establishing that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by December 31, 2045. SB 100 also creates new standards for the RPS goals that were established by SB 350 in 2015. Specifically, the bill increases required energy from renewable sources for both investor-owned utilities and publicly owned utilities from 50 percent to 60 percent by 2030. Incrementally, these energy providers must also have a renewable energy supply of 33 percent by 2020, 44 percent by 2024, and 52 percent by 2027. The updated RPS goals are considered achievable, since many California energy providers are already meeting or exceeding the RPS goals established by SB 350. The Adjusted BAU forecasts accounts for these renewable energy targets, as discussed below.

Electricity Emission Factors under the Renewable Portfolio Standard

To account for California's RPS targets under SB 100 in the Adjusted BAU forecast, the GHG emission factors for electricity consumption were adjusted. These emission factors represent indirect GHG emissions generated at power plants and are applied to electricity consumption in the County (see Appendix A for discussion). The RPS has the effect of lowering indirect emissions associated with electricity consumption because it mandates increasing percentages of renewable sources of power supplied by electricity utilities in future years. The RPS requires 60% eligible renewables by 2030 and 100% RPS-eligible renewable resources by 2045.¹

The two utilities supplying electricity to the County are Southern California Edison (SCE) and Clean Power Alliance (CPA). To adjust for the RPS in future years, indirect electricity emission factors reported by SCE and CPA along with the energy power mix were collected for the years 2015-2020. SCE reports their emission factors in their annual sustainability reports and has values for 2015-2019. CPA reports their emission factors to the Climate Registry and has values for 2018-2020. The California Energy Commission (CEC) reports power mix data in Power Content Labels; these are available through 2020 for both SCE and CPA.²

Based on data reported for 2016-2020, a composite "non-RPS" emission intensity factor was generated for each year. This factor is calculated based on the reported total emission factor and the non-RPS power mix. For example, SCE's total reported emission factor in 2019 is 396.8 pounds (lbs) of carbon

¹ RPS-eligible resources include solar, wind, geothermal, small hydroelectric, or biopower facilities that are located within the Western Electricity Coordinating Council (WECC) region, which encompasses fourteen western U.S. states and portions of Canada and Mexico. The majority of RPS-eligible electricity currently comes from solar and wind. Large hydroelectric dams and nuclear facilities, two major sources of carbon-free power, are not RPS-eligible.

² California Energy Commission (CEC), 2018 Power Content Label. July 2019. Available at: https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_Southern_California_Edison.pdf. Accessed January 2021.

dioxide equivalent (CO₂e) per megawatt hour (MWh) for a non-RPS power mix of 65%; the “non-RPS” emission intensity factor is therefore 612.4 lbs CO₂e/MWh. Then, for each forecast year (2030, 2035, and 2045), an emission factor for total delivered electricity was calculated based on these composite “non-RPS” emission intensity factors for each reported year and the projected RPS requirement for eligible renewables for each year. For example, a 60% eligible renewable mix (required by 2030) applied to the “non-RPS” emission intensity factor of 612.4 lbs CO₂e/MWh results in a total emission factor of 245 lbs CO₂e/MWh.

Table B-1 presents the electricity power mix values reported (2016-2020) and forecasted (2030, 2035, 2045) for SCE and CPA, incorporating the RPS. **Table B-2** presents the electricity emission factors reported for SCE and CPA for 2016-2020 along with the Adjusted BAU forecast for 2030, 2035, and 2045, incorporating the RPS.

Table B-1: SCE and CPA Electricity Power Mix

ELECTRICITY POWER MIX	REPORTED					FORECASTED		
	2016	2017	2018	2019	2020	2030	2035	2045
SCE								
Eligible Renewables	28%	32%	36%	35%	n/a	60%	73%	100%
Nuclear & Hydroelectric	25%	28%	21%	24%	n/a	n/a	n/a	n/a
Natural Gas & Unspecified	60%	54%	54%	49%	n/a	n/a	n/a	n/a
CPA Lean Rate								
Eligible Renewables	n/a	n/a	65%	36%	41%	60%	73%	100%
Nuclear & Hydroelectric	n/a	n/a	24%	1%	5%	n/a	n/a	n/a
Natural Gas & Unspecified	n/a	n/a	11%	63%	55%	n/a	n/a	n/a
CPA Clean Rate								
Eligible Renewables	n/a	n/a	61%	51%	50%	60%	73%	100%
Nuclear & Hydroelectric	n/a	n/a	26%	14%	9%	n/a	n/a	n/a
Natural Gas & Unspecified	n/a	n/a	13%	36%	41%	n/a	n/a	n/a

NOTES:

n/a = data not available or not applicable; SCE = Southern California Edison; CPA = Clean Power Alliance.

Reported values are shown for 2016-2020. Estimated (forecasted) values based on Renewable Portfolio Standard are shown for 2030, 2035, and 2045.

Table B-2: SCE and CPA Electricity Emission Factors under The Renewable Portfolio Standard

UTILITY AND CATEGORY OF ELECTRICITY SUPPLY	EMISSION FACTORS (LBS CO ₂ E/MWH)							
	2016	2017	2018	2019	2020	2030	2035	2045
SCE								
Non-RPS Electricity	734.7	807.4	801.6	606.5	n/a	738.6	738.6	n/a
Total Delivered Electricity	529	549	513.0	393.0	n/a	295.5	197.0	0.0
CPA Lean								
Non-RPS Electricity	n/a	n/a	30.3	590.0	1029.6	809.8	809.8	n/a
Total Delivered Electricity	n/a	n/a	10.6	377.6	608.5	323.9	215.9	0.0
CPA Clean								
Non-RPS Electricity	n/a	n/a	25.1	342.2	685.7	513.9	513.9	n/a
Total Delivered Electricity	n/a	n/a	9.8	169.4	342.2	205.6	137.0	0.0

NOTES:

n/a = data not available or not applicable; lbs = pounds; CO₂e = carbon dioxide equivalent; MWh = megawatt hour.

Reported values are shown for 2016-2020. Estimated (forecasted) values based on RPS are shown for 2030, 2035, and 2045.

Data Sources:

- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- Power Content Labels
Link: <https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure/power-content-label>
- California RPS Program Overview
Link: https://www.cpuc.ca.gov/RPS_Overview/
- Senate Bill 100
Link: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=2017201805B100

Residential Buildings

Like the BAU Forecast, energy consumption in residential buildings is projected based on building footprint projections for residential stock in unincorporated Los Angeles County (see Appendix A). As discussed above, the electricity emission factors for electricity supplied by SCE are based on SCE’s historical power mix (2015-2019) and RPS targets.³ To account for the RPS and SB100, SCE emission factors were applied to total residential electricity consumption for 2018, 2030, 2035, and 2045. As reported in Table B-2 above, SCE emission factors were estimated to be 513 lbs CO₂e/MWh in 2018, 295.5 lbs CO₂e/MWh in 2030, 197 lbs CO₂e/MWh in 2035, and 0 CO₂e/lbs/MWh in 2045.

³ California Energy Commission (CEC), 2018 Power Content Label. July 2019. Available at: https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_Southern_California_Edison.pdf. Accessed January 2021.

Beginning in 2019, residential customers in unincorporated Los Angeles County were automatically enrolled in the Clean Power Alliance’s (CPA) “Clean” electricity rate option. While participation data for 2018 were unavailable when the 2018 inventory was developed, a July 2021 member status report indicated a 96% participation rate for all residential customers in unincorporated County areas in 2021.⁴ Under the Clean rate option in 2018, residential customers received 61 percent of their electricity from eligible renewable sources via the CPA, 26 percent from carbon-free sources like hydropower, and 13 percent from unspecified fossil-fuel sources like natural gas and coal (see Table B-1 above). The remaining 4% of residential customers were enrolled in CPA’s “Lean” electricity rate option. Under the Lean rate option in 2018, residential customers received 65 percent of their electricity from eligible renewable sources via the CPA, 24 percent from carbon-free sources like hydropower, and 11 percent from unspecified fossil-fuel sources like natural gas and coal (see Table B-1 above).

GHG emissions from CPA-provided electricity are calculated using CPA data including electricity consumption, emission factors, and power mix.⁵ As reported in Table B-2 above, CPA’s Lean emission rates are estimated to be 10.6 lbs CO₂e/MWh in 2018, 323.9 lbs CO₂e/MWh in 2030, 215.9 lbs CO₂e/MWh in 2035, and 0 lbs CO₂e/MWh in 2045.⁶ CPA’s Clean emission rates are estimated to be 9.8 lbs CO₂e/MWh in 2018, 205.6 lbs CO₂e/MWh in 2030, 137 lbs CO₂e/MWh in 2035, and 0 lbs CO₂e/MWh in 2045.⁷ CPA emission factors were applied to total residential electricity consumption in 2018, 2030, 2035, and 2045 and emissions for interim years were linearly interpolated.

For emissions associated with natural gas consumption, emission factors are held constant from 2018.⁸ RPS and SB 100 do not affect natural gas usage or emissions, and there are no federal, state, or local policies that would result in changes to the natural gas emission factors in the Adjusted BAU forecast.

Data Sources:

- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- Power Content Labels
Link: <https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure/power-content-label>
- California RPS Program Overview
Link: https://www.cpuc.ca.gov/RPS_Overview/
- Senate Bill 100
Link: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100

⁴ Clean Power Alliance, Member Status Report: Los Angeles County. July 28, 2021.

⁵ CEC, 2018 CPA Power Content Label. July 2019. Available at: https://www.energy.ca.gov/sites/default/files/2020-01/2018_PCL_Clean_Power_Alliance.pdf. Accessed January 2021.

⁶ The Climate Registry, Utility-Specific Emission Factors. 2020. Available at: <https://www.theclimateregistry.org/our-members/cris-public-reports/>. Accessed January 2021.

⁷ *Ibid*

⁸ The Climate Registry, Default Emission Factors. May 1, 2018. Available at: <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf>. Accessed January 2021.

Commercial and Institutional Buildings

Like the BAU Forecast, energy consumption in commercial, institutional, and agricultural buildings is forecasted based on building footprint projections for non-residential building stock in unincorporated Los Angeles County (see Appendix A). In June 2018, non-residential customers in unincorporated Los Angeles County were enrolled in CPA's Clean Power option, with less than 5 percent of customers opting out; the year-end CPA participation rate is held constant with the remaining customers continuing to receive electricity from SCE. The emission factors for CPA are based on historical power mix (2018-2020) and California's RPS targets, as discussed above and presented in Table B-1.⁹ Emission factors for SCE and CPA are described under *Electricity Emission Factors under the Renewable Portfolio Standard*, above. Natural gas emission factors are held constant from 2018.

Data Sources:

- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- Power Content Labels
Link: <https://www.energy.ca.gov/programs-and-topics/programs/power-source-disclosure/power-content-label>
- California RPS Program Overview
Link: https://www.cpuc.ca.gov/RPS_Overview/
- Senate Bill 100
Link: https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB100

Manufacturing and Industrial Buildings

ELECTRICITY AND NATURAL GAS

Like the BAU Forecast, energy consumption in manufacturing and industrial buildings are forecasted based on building footprint projections for non-residential stock in unincorporated Los Angeles County (see Appendix A).¹⁰ As discussed above, beginning in 2018, non-residential customers in unincorporated Los Angeles County were enrolled in CPA's Clean Power rate option (50% eligible renewable), with less than 5 percent of customers opting out; the year-end CPA participation rate is held constant with the remaining customers continuing to receive electricity from SCE. The emission factors for CPA are based on historical power mix (2018-2020) and California's RPS targets, as discussed above and presented in Table B-1.¹¹ Emission factors for SCE and CPA are the same as described under *Electricity Emission Factors under the Renewable Portfolio Standard*, above.

⁹ California Public Utilities Commission (CPUC), Renewables Portfolio Standards (RPS). 2018. Available at: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps/rps-program-overview>. Accessed January 2021.

¹⁰ UCLA Institute of Environmental Studies, Analysis of Los Angeles County Parcel Assessor's Data. 2018.

¹¹ California Public Utilities Commission (CPUC), Renewables Portfolio Standards (RPS). 2018. Available at: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-power-procurement/rps/rps-program-overview>. Accessed January 2021.

California Building and Energy Efficiency Standards (Title 24)

The CEC first adopted Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the State. Although not originally intended to reduce GHG emissions, increased energy efficiency and reduced consumption of electricity, natural gas, and other fuels would result in fewer GHG emissions from residential and nonresidential buildings subject to the standard. The standards are updated periodically (typically every three years) to allow for the consideration and inclusion of new energy efficiency technologies and methods (CEC, 2016). The current Title 24, Part 6 standards (2019 standards) were made effective on January 1, 2020. The new Title 24, Part 6 standards (2022 standards) were adopted by the CEC in August 2021 and will be made effective on January 1, 2023. The Adjusted BAU forecasts accounts for these updates to Title 24, as discussed below.

Residential Buildings

Under the Adjusted BAU scenario, energy use in residential buildings was adjusted to reflect the effects of Title 24 standards. Title 24 Building Efficiency Standards are updated every three years by the California Energy Commission. The model uses approximate increased energy efficiency percentages for the 2019 Title 24 standards¹² implemented in 2020, and the 2022 standards to be implemented in 2023.¹³ The 2019 percentages are based on CEC estimates for residential and non-residential buildings and assume that the solar PV requirement is met. The 2022 percentages were calculated based on CEC's Draft Environmental Impact Report for the 2022 standards.¹⁴ This document outlined the changes in building energy use from the 2019 to 2022 standards on a project-by-project basis. Weighted averages were taken to generate efficiency change values for single and multi-family residential buildings for both electricity and natural gas. These efficiency changes are applied to 2019 energy use intensity (EUI) values to generate 2022 EUI values for each building type, which are then applied to the square footage of new construction. In the model, the adjusted EUI is also applied to 15% of the total square footage of existing buildings to account for the approximately 15% of buildings that are retrofitted each year. Because Title 24 is updated on a three-year cycle, the 2022 changes in energy efficiency are applied every three years in the model.

Data Sources:

- Title 24 2019 Update

Link: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf

¹² CEC, 2019 Building Energy Efficiency Standards FAQ. 2020. Available at: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf. Accessed December 2021.

¹³ CEC, 2022 Building Energy Efficiency Standards Summary. 2021. Available at: https://www.energy.ca.gov/sites/default/files/2021-08/CEC_2022_EnergyCodeUpdateSummary_ADA.pdf. Accessed December 2021.

¹⁴ CEC, Draft Environmental Impact Report: Amendments to the Building Energy Efficiency Standards (2022 Energy Code). Available at: <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>. Accessed December 2021.

- Title 24 2022 Update
Link: https://www.energy.ca.gov/sites/default/files/2021-08/CEC_2022_EnergyCodeUpdateSummary_ADA.pdf
- Title 24 2022 Environmental Impact Report
|Link: <https://files.ceqanet.opr.ca.gov/268487-2/attachment/MNZKECIHPRRVXPxfeMxjloL-VXe6AFxDecdnxi8c5vzAkZWPhhj5GPnAarnDp4zd7reUQfLY0fV2A170>

Commercial and Institutional Buildings

Under the Adjusted BAU scenario, energy use in commercial, institutional, and agricultural buildings was adjusted to reflect the effects of Title 24 standards. The methods for adjusting energy use under new Title 24 standards are the same as described for *Residential Buildings*, above.

Data Sources:

- Title 24 2019 Update
Link: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf
- Title 24 2022 Update
Link: https://www.energy.ca.gov/sites/default/files/2021-08/CEC_2022_EnergyCodeUpdateSummary_ADA.pdf
- Title 24 2022 Environmental Impact Report
Link: <https://files.ceqanet.opr.ca.gov/268487-2/attachment/MNZKECIHPRRVXPxfeMxjloL-VXe6AFxDecdnxi8c5vzAkZWPhhj5GPnAarnDp4zd7reUQfLY0fV2A170>

Manufacturing and Industrial Buildings

Under the Adjusted BAU scenario, energy use in manufacturing and construction buildings was adjusted to reflect the effects of Title 24 standards. The methods for adjusting energy use under new Title 24 standards are the same as described for *Residential Buildings*, above. Title 24 Building Efficiency Standards are updated every three years by the California Energy Commission.

Data Sources:

- Title 24 2019 Update
Link: https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf
- Title 24 2022 Update
Link: https://www.energy.ca.gov/sites/default/files/2021-08/CEC_2022_EnergyCodeUpdateSummary_ADA.pdf
- Title 24 2022 Environmental Impact Report
Link: <https://files.ceqanet.opr.ca.gov/268487-2/attachment/MNZKECIHPRRVXPxfeMxjloL-VXe6AFxDecdnxi8c5vzAkZWPhhj5GPnAarnDp4zd7reUQfLY0fV2A170>

Advanced Clean Cars and Pavley Vehicle Efficiency Standards

In 2002, Governor Gray Davis signed Assembly Bill (AB) 1493. AB 1493 requires that CARB develop and adopt, by January 1, 2005, regulations that achieve “the maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light-duty trucks and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the State.” To meet the

requirements of AB 1493, in 2004 CARB approved amendments to the California Code of Regulations, adding GHG emissions standards to California's existing standards for motor vehicle emissions. All mobile sources are required to comply with these regulations as they are phased in from 2009 through 2016. These regulations are known as the Pavley standards (named for the bill's author, State Senator Fran Pavley).

In January 2012, pursuant to Recommended Measures T-1 and T-4 of the Original Scoping Plan, CARB approved the Advanced Clean Cars Program, an emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions. The program also requires car manufacturers to offer for sale an increasing number of zero-emission vehicles (ZEVs) each year, including battery electric, fuel cell, and plug-in hybrid electric vehicles. In December 2012, CARB adopted regulations allowing car manufacturers to comply with California's GHG emissions requirements for model years 2017–2025 through compliance with the EPA GHG requirements for those same model years.¹⁵

The Adjusted BAU forecasts accounts for these vehicle fleet efficiency standards, as discussed below.

On-road Transportation: Passenger Vehicles and Trucks

Like the BAU forecast, VMT from passenger vehicles and trucks were estimated using SCAG's 2016 Regional Travel Demand Model, which forecasts VMT for the year 2040 (see Appendix A). GHG emissions under ACC and Pavley in the unincorporated County are calculated using VMT and corresponding weighted emission factors by vehicle type (passenger vehicles and trucks)¹⁶ for years 2018, 2030, 2035, and 2045 from the EMFAC2021 model.¹⁷ Interim year emissions were interpolated for 2019 through 2029, 2031 through 2034, and 2036 through 2044.

Data Sources:

- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>
- SCAG Regional Travel Demand Model
Provided by SCAG

On-road Transportation: Buses

¹⁵ Advanced Clean Car program information available online at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about>. Accessed on February 7, 2020.

¹⁶ Passenger vehicles correspond to EMFAC categories LDA, LDT1, LDT2, MCY, and MD. Trucks correspond to EMFAC categories LHDT1, LHDT2, MHDT, HHDT, and MH.

¹⁷ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

Fuel consumption from Metro buses for years 2019 through 2045 was calculated using fuel consumption and VMT data from the EMFAC2021 model. The EMFAC2021 model was run for years 2018, 2030, 2035, and 2045 and the fuel efficiency (miles per gallon, miles per gallon equivalent, or kWh/mile) were calculated.¹⁸ An efficiency factor for diesel, gasoline, compressed natural gas, and electricity was then developed by dividing the 2030, 2035, and 2045 fuel efficiency by the baseline fuel efficiency in 2018. The efficiency factor was then applied to the 2018 fuel consumption by fuel type to determine the project fuel consumption for years 2030, 2035, and 2045. Emission factors for gasoline, diesel and compressed natural (CNG) gas-powered buses are taken from EMFAC2021 database to calculate GHG emissions. Electricity emissions were calculated using CPA Clean option emission factors for the corresponding year. Emissions for interim years were interpolated for years 2019 through 2030, 2031 through 2034, and 2036 through 2044.

Data Sources:

- Metro Bus Ridership
Link: <https://isotp.metro.net/MetroRidership/Index.aspx>
- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>

Adjusted BAU Forecast Results

Table B-3 presents emissions for 2018 along with the Adjusted BAU forecast for 2030, 2035, and 2045 for the Stationary Energy sector.

Table B-3: Stationary Energy GHG Emissions – 2018 Inventory and Adjusted BAU Forecasts

STATIONARY ENERGY SUBSECTOR	ANNUAL GHG EMISSIONS (MTCO2E)			
	2018	2030	2035	2045
Residential Buildings	962,743	825,053	755,555	617,836
Commercial, Institutional, and Agricultural Buildings	349,373	344,421	291,764	185,682
Manufacturing and Construction Buildings	244,417	251,607	212,726	133,633
Energy Industries	98,554	29,495	29,526	29,587
Fugitive Emissions from Oil and Natural Gas Systems	41,066	49,130	49,275	49,493
Agriculture, Forestry and Other Fishing Activities	2,658	2,600	2,580	2,562
TOTAL	1,698,809	1,502,306	1,341,401	1,018,793

NOTES: these emissions account for the RPS, SB 100, and Title 24 updates.

¹⁸ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

Table B-4 presents emissions for 2018 along with the adjusted BAU forecast for 2030, 2035, and 2045 for the Transportation sector.

Table B-4: Transportation GHG Emissions – 2018 Inventory and Adjusted BAU Forecasts

TRANSPORTATION SUBSECTOR	ANNUAL GHG EMISSIONS (MTCO2E)			
	2018	2030	2035	2045
Passenger Vehicles	2,665,824	2,166,604	2,047,769	1,977,297
Buses	29,371	29,026	22,076	5,326
Railways	9,490	10,255	10,389	10,658
TOTAL	2,704,685	2,205,885	2,080,234	1,993,281

NOTES: these emissions account for the Advanced Clean Cars and Pavley Vehicle Efficiency Standards.

Table B-5 presents total emissions for 2018 along with the Adjusted BAU forecast for 2030, 2035, and 2045 for all sectors.

Table B-5: Total GHG Emissions by Sector – 2018 Inventory and Adjusted BAU Forecasts

SECTOR	ANNUAL GHG EMISSIONS (MTCO2E)			
	2018	2030	2035	2045
Stationary Energy	1,698,809	1,502,306	1,341,401	1,018,793
Transportation	2,704,750	2,205,885	2,080,234	1,993,281
Waste	469,382	451,919	454,097	482,489
IPPU	239,505	259,605	267,981	284,731
AFOLU	60,860	60,860	60,860	60,860
TOTAL	5,173,240	4,480,574	4,204,572	3,840,154

NOTES: Compared to the BAU forecasts, the Adjusted BAU forecast only differs for the Stationary Energy and Transportation sectors. Waste, IPPU, and AFOLU are not changed.

Figure B-1 presents total emissions for 2018 along with the BAU and Adjusted BAU forecast for 2030, 2035, and 2045 for all sectors.

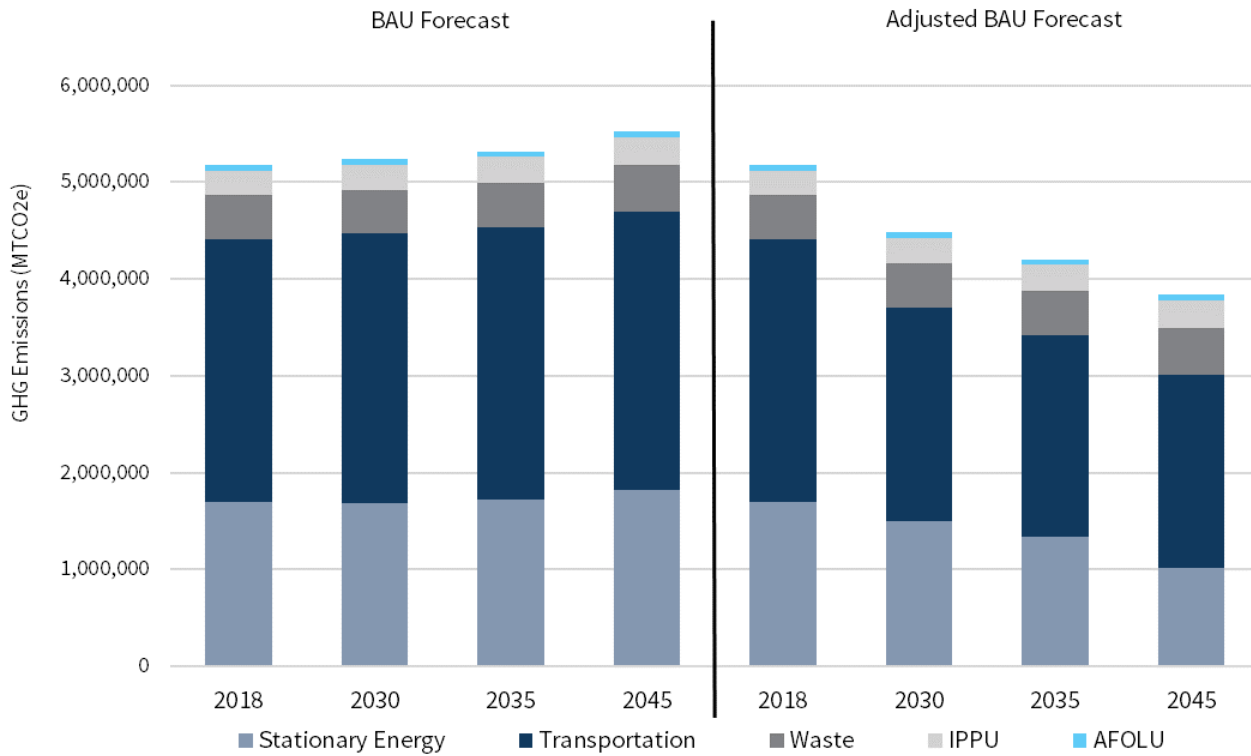


Figure B-1: GHG Emissions by Sector – 2018 Inventory, BAU Forecast, and Adjusted BAU Forecast

B.2 GHG Reduction Measures and Actions

Energy Supply

Strategy 1: Decarbonize the Energy Supply

MEASURE ES1: DEVELOP A SUNSET STRATEGY FOR ALL OIL AND GAS OPERATION

Table B-6: Measure ES1 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	28,368
2035	40,178
2045	52,148

Description

Develop a sunset strategy for all oil and gas operations that prioritizes disproportionately affected communities.

Performance Objectives

The goal of Measure ES1 is to reduce oil and gas operations by 40 percent by 2030, 60 percent by 2035, and 80 percent by 2045 (compared to 2015 baseline levels). The aspirational goal of Measure ES1, based on the OurCounty Sustainability Plan, is to cease all oil and gas operations by 2040.

Modeling Approach

Measure ES1 would apply to emissions occurring in the Energy Industries subsector of the Stationary Energy sector of the County's GHG inventory. Specifically, Measure ES1 would reduce emissions from combined heat and power (CHP) facilities and fugitive emissions from oil and natural gas systems. There are two CHP facilities that would reduce emissions under this measure: the Pitchess Cogeneration Station in Saugus and the Olive View Medical Center Cogeneration Station in Sylmar. All three of these facilities combust natural gas to generate heat and electricity.

Both the Pitchess Cogeneration Station and the Olive View Medical Center Cogeneration Station are owned and operated by the County. The Pitchess Cogeneration Station was decommissioned in 2018 and its emissions decreased by 90 percent from 2017 to 2018. Under Measure ES1, these emissions were assumed to remain constant through 2045. The Olive View Medical Center Cogeneration Station will be decommissioned by 2023, so its emissions were reduced by 90% consistent with the reduction in emissions achieved when the Pitchess Cogeneration Station was decommissioned.

Measure ES1 would also reduce fugitive emissions from oil and natural gas systems equivalent to the measure's performance objectives: 40 below 2015 levels by 2030, 60 percent by 2035, and 80 percent by 2045. These percentages were multiplied by 2015 emissions to estimate emission reductions for each future year.

Assumptions

- The decommissioning of the Olive View Medical Center Cogeneration Station would reduce natural gas-related GHG emissions by 90%.
- Under Measure ES1, both the Pitchess Cogeneration Station and the Olive View Medical Center Cogeneration Station would continue to combust residual natural gas at 10% of their fully operational levels through 2045.
- Measure ES1 will reduce fugitive emissions from oil and natural gas systems linearly with the measure's overall performance objectives for each future year.

Data Sources

- CARB Pollution Mapping Tool
Link: https://www.arb.ca.gov/ei/tools/pollution_map/
- CARB MRR Database
Link: <https://ww2.arb.ca.gov/mrr-data>

MEASURE ES2: PROCURE ZERO CARBON ELECTRICITY

Table B-15: Measure ES2 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	477,188
2035	317,915
2045	0

Description

Supplying the County’s electricity demand with zero-carbon electricity¹⁹ is critical to achieving significant GHG emission reductions. Zero-carbon electricity is supplied by the CPA, which is a non-profit and community choice energy provider that currently serves 32 communities across Southern California.

Performance Objectives

The goal of Measure ES2 is to enroll 100% of municipal facilities in CPA’s Green Power rate option (100% Renewables) by 2025 and 96% of the unincorporated County community in CPA’s Green Power rate option by 2030.

Modeling Approach

The Measure ES2 calculations use Adjusted BAU electricity activity data and GHG emissions for residential and non-residential uses in 2030, 2035, and 2045 as a baseline. The default participation rate in the CPA Lean and CPA Clean rate options was changed from 47% Clean and 48% Lean to 95.6% Green and 4.4% Lean by 2030 and 2035, and to 95.6% Green and 4.4% Clean by 2045. GHG emissions were calculated using the Measure ES2 participation rates and CPA emission factors for 2030, 2035, and 2045 (as described in B.1, *Stationary Energy*). GHG emissions after implementation of Measure ES2 were then subtracted from the Adjusted BAU forecast emissions to estimate the GHG emission reductions produced by Measure ES2.

Assumptions

- CPA and SCE emission factors for electricity are the same as those reported in section B.1 above.
- CPA Lean and SCE emission factors are equal; the SCE emission factors are applied to the to the “Opt Out / CPA Lean” category of electricity use in the County.
- The overall CPA participation rate (95.6%) remains constant through 2045.
- Measure ES2 is the first energy measure implemented; therefore, GHG emission reductions associated with electricity savings as calculated in subsequent energy measures incorporate Measure ES2 participation rates and electricity emission factors.

Data Sources

- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>

¹⁹ “Zero-carbon electricity” means energy resources that either qualify as “renewable” in the most recent Renewables Portfolio Standard (RPS) Eligibility Guidebook or generate zero greenhouse gas emissions on-site, such as hydropower.

- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011

MEASURE ES3: INCREASE RENEWABLE ENERGY PRODUCTION

Table B-18: Measure ES3 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	2,188
2035	2,614
2045	0

Description

Expand local on-site solar electricity generation on existing and new development throughout the County and at municipal facilities.

Performance Objectives

The goal of Measure ES3 is to increase on-site solar electricity production for existing and new multi-family residential buildings, existing commercial buildings, and municipal buildings. The measure aims to install rooftop solar photovoltaic (PV) on 5 percent of existing residential and commercial buildings by 2030, 10 percent by 2035, and 20 percent by 2045; install rooftop solar PV on 80 percent of new multi-family residential buildings by 2030, 85 percent by 2035, and 95 percent by 2045; install rooftop solar PV on 40 percent of new commercial buildings by 2030, 50 percent by 2035, and 70 percent by 2045; and install 20,000 kilowatts (kW) of rooftop solar PV at county facilities.

Modeling Approach

Residential

GHG emission reductions from rooftop solar PV were calculated using multi-family and single-family housing data and projections from the California Department of Finance. The baseline year for existing residential buildings is assumed to be 2023 because this is the earliest date that the 2045 CAP could be adopted and go into effect. Installation of rooftop solar PV on existing multi-family and single-family residential buildings therefore assumes a baseline year of 2023, and installation of rooftop solar PV on new multi-family residential buildings in 2030, 2035, and 2045 is based on the cumulative number of new multi-family households constructed from 2023 through each target years (e.g., the number of new multi-family residential buildings in 2030 is equal to the sum of all new multi-family housing built between 2023 and 2030).

The total number of existing and new households for each target year was then multiplied by the solar PV installation rate for each target year to obtain the number of participating households installing rooftop solar PV through implementation of Measure ES3. The average multi-family solar system size of 6.1 kW was calculated using data from Center for Sustainable Energy's *Fostering a Future for Multifamily*

Solar study for the City of Santa Monica.²⁰ The average annual system electricity production (or system output) in kWh was then determined by inputting the 6.1 kW average system size into the National Renewable Energy Laboratory (NREL) PVWatts calculator for a project located in Los Angeles.²¹ The average system output was then multiplied by the number of participating households for both existing and new multifamily development to determine the total solar production (in kWh) for each target year. GHG emission reductions were calculated by multiplying the total solar production by the relevant SCE and CPA electricity emission factors, using the same participation rates and electricity emission factors implemented under Measure ES2.

For existing single-family residential buildings, the total number of households was multiplied by the solar PV installation rate for each target year to obtain the number of participating households installing rooftop solar PV through implementation of Measure ES5. The average single-family solar system size of 6.3 kW was calculated using data from using Statewide data from Berkeley Laboratory's *Tracking the Sun* database.²² The average annual system electricity production (or system output) in kWh was then determined by inputting the 6.3 kW average system size into the National Renewable Energy Laboratory (NREL) PVWatts calculator for a project located in Los Angeles.²³ The average system output was then multiplied by the number of participating households for existing single-family development to determine the total solar production (in kWh) for each target year. GHG emission reductions were calculated by multiplying the total solar production by the relevant SCE and CPA electricity emission factors, using the same participation rates and electricity emission factors implemented under Measure ES2.

Measure E6 does not include rooftop solar PV installations on new single-family residential buildings because this is already required through the current 2019 Title 24 standards and also the new 2022 Title 24 standards and is therefore accounted for in the Adjusted BAU forecast.

Commercial

GHG emission reductions from rooftop solar PV were calculated using existing and new commercial building square footage data from UCLA.²⁴ Like residential buildings above, the baseline year for existing commercial buildings is assumed to be 2023. Installation of rooftop solar PV on existing commercial buildings therefore assumes a baseline year of 2023, and installation of rooftop solar PV on new commercial buildings in 2030, 2035, and 2045 is based on the cumulative number of new commercial square footage constructed from 2023 through each target year (e.g., the number of new commercial square footage in 2030 is equal to the sum of all new commercial square footage built between 2023 and 2030).

²⁰ Center for Sustainable Energy, *Fostering a Future for Multifamily Solar in Santa Monica, CA*. February 2018. Available at: <https://energycenter.org/sites/default/files/docs/nav/programs/smp/SantaMonicaMarketProfile.pdf>. Accessed November 2021.

²¹ NREL, PVWatts Calculator. 2021. Available at: <https://pvwatts.nrel.gov/>. Accessed November 2021.

²² Berkeley Laboratory, *Tracking the Sun*. September 2021. Available at: <https://emp.lbl.gov/tracking-the-sun>. Accessed November 2021.

²³ NREL, PVWatts Calculator. 2021. Available at: <https://pvwatts.nrel.gov/>. Accessed November 2021.

²⁴ UCLA Institute of Environmental Studies, *Analysis of Los Angeles County Parcel Assessor's Data*. 2018.

Similar to residential buildings, the building square footage was multiplied by the solar PV installation rate for each target year to obtain the total participating commercial square footage installing rooftop solar PV through implementation of Measure ES3. The total number of commercial solar systems was determined by dividing the participating square footage by the average square footage of a commercial building in California of 15,599 square feet.²⁵ The average commercial solar system size was estimated using Statewide data from Berkeley Laboratory's *Tracking the Sun* database; this value is 137.1 kW per commercial system.²⁶ The average annual electricity production (or system output) in kWh was then determined by inputting the average system size into the NREL PVWatts calculator for a project located in Los Angeles.²⁷ The average system output was then multiplied by the number of commercial solar systems for both existing and new development to determine the total solar production (in kWh) for each target year. GHG emissions reductions were calculated by multiplying the total solar production by the relevant SCE and CPA electricity emission factors, using the same participation rates and electricity emission factors implemented under Measure ES2.

Municipal

GHG emission reductions from municipal solar PV installations assumes that the County will install a total of 30 solar systems on County facilities producing a total capacity of 20 MW. The average system output was then determined by inputting a 20 MW production value into the NREL PVWatts calculator for a project located in Los Angeles.²⁸ The total system output for 20 MW of solar was then multiplied by the relevant SCE and CPA electricity emission factors, using the same participation rates and emission factors implemented under Measure ES2.

Assumptions

- CPA and SCE emission factors for electricity are the same as those reported in section B.1 above.
- CPA participation rates after implementation of Measure ES2.
- Existing building stock represents the built environment through the year 2023.
- New building stock represents new development starting in 2025.
- The average multifamily solar PV system size is 6.1 kW; each system produces 10,067 kWh per year.
- The average single-family solar PV system size is 6.3 kW; each system produces 10,466 kWh per year.
- The average commercial building solar PV system size is 137.1 kW; each system produces 227,758 kWh per year.
- 20 MW of solar PV is installed at municipal facilities; these systems produce 36,068,108 kWh per year.
- Annual GHG emission reductions for each target year (2030, 2035, and 2045) reflect all buildings electrified in all previous years (e.g., all buildings electrified from 2025-2030 contribute to annual emission reductions in 2030).
- New single-family residential buildings are required to install solar PV pursuant to the 2019 and 2022 Title 24 standards.

Data Sources

- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>

²⁵ USEIA, 2018 Commercial Buildings Energy Consumption Survey. September 2021. Available at: https://www.eia.gov/consumption/commercial/data/2018/pdf/CBECS_2018_Building_Characteristics_Flipbook.pdf. Accessed November 2021.

²⁶ Berkeley Laboratory, Tracking the Sun. September 2021. Available at: <https://emp.lbl.gov/tracking-the-sun>. Accessed November 2021.

²⁷ NREL, PVWatts Calculator. 2021. Available at: <https://pvwatts.nrel.gov/>. Accessed November 2021.

²⁸ Ibid

- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011
- California Department of Finance Demographic data
Link: <https://www.dof.ca.gov/Forecasting/Demographics/>
- UCLA analysis of Los Angeles County Parcel Assessor’s Data
Provided by UCLA Institute of Environmental Studies
- Center for Sustainable Energy, Fostering a Future for Multifamily Solar in Santa Monica, CA.
Link: <https://energycenter.org/sites/default/files/docs/nav/programs/smp/SantaMonicaMarketProfile.pdf>
- USEIA, 2018 Commercial Buildings Energy Consumption Survey
Link: https://www.eia.gov/consumption/commercial/data/2018/pdf/CBECS_2018_Building_Characteristics_Flipbook.pdf
- Berkeley Laboratory, Tracking the Sun
Link: <https://emp.lbl.gov/tracking-the-sun>
- NREL, PVWatts Calculator
Link: <https://pvwatts.nrel.gov/>

Transportation

GHG emission reductions modeled for Measures T1, T2, T3, and T4 are based on changes to land use and transportation infrastructure (such as bikeways and transit) already envisioned in existing County plans and programs, such as the 2021 Housing Element Update and its Program EIR, the Los Angeles County Bike Master Plan (2012), the LA Metro NextGen Plan (2020), and LA Metro Long Range Transportation Plan (2020). The 2045 CAP does not result in any new changes to land use or transportation infrastructure than what was already analyzed in these existing plans and their associated environmental review documents prepared subject to CEQA. Consequently, the 2045 CAP merely models the GHG emission reductions associated with changes to land use and transportation infrastructure that were already analyzed elsewhere.

Strategy 2: Increase Densities and Diversity of Destinations with an Emphasis Near Transit

MEASURE T1: INCREASE DENSITY NEAR HIGH-QUALITY TRANSIT AREAS

Table B-7: Measure T1 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	27,357
2035	26,019
2045	25,276

Description

Increasing residential density, particularly near transit and affordable housing, is shown to reduce VMT.

Performance Objectives

The goal of Measure T1 is to increase residential density by achieving a minimum of 20 dwelling units (DU) per acre for High Quality Transit Areas (HQTAs), Specific Plans, or Area Plans, locate residential and employment centers within one mile of an HQTA, and increase the dwelling units within HQTAs by 27 percent.

Modeling Approach

VMT reductions were estimated using research documented in the 2021 California Air Pollution Control Officers Association (CAPCOA) publication, *Quantifying Greenhouse Gas Mitigation Measures* (referred to herein as the “CAPCOA handbook”).²⁹ To quantify VMT reductions, appropriate equations were used based on factsheets in the CAPCOA handbook. Using data from an LA County GIS shapefile layer showing the 2029 Housing Element Rezone Areas and a major transit stop GIS layer developed as part of the LA County SB 743 VMT Tool released in late 2020, along with CAPCOA equations, percent reductions in VMT were estimated for Measure T1. Specifically, it was assumed that the residential density within HQTAs as planned for in the County’s 2021 Housing Element Update would be 20 DU per acre (the Housing Element Update analyzed densities from 20 DU/acre to 50 du/acre) compared to the typical density value of 9.1 DU/acre, resulting in a 26.4% reduction in passenger vehicle VMT for affected areas. This reduction was applied to the specific home-based VMT occurring within the affected transit-oriented design (TOD) areas in the County.

VMT was calculated at the transportation analysis zone (TAZ) level.³⁰ Once the percent VMT reductions were determined, based on the geographic scope and VMT category of Measure T1, the appropriate VMT was aggregated across the relevant TAZs within which residential densities would increase. Percent reductions were then applied to appropriate VMT sub-totals to obtain the VMT reduction estimates. The sum of these reductions was then subtracted from total light-duty vehicle VMT to estimate adjusted daily VMT. This adjusted daily VMT was then projected to obtain VMT reductions and adjusted totals in each analysis year (2030, 2035, and 2045). These VMT calculations were prepared by Fehr & Peers and supplied to the County.

GHG reductions from Measure T1 are calculated using daily VMT reductions provided by Fehr & Peers, as described above.³¹ The average daily VMT reductions achieved through implementation of Measure T1 were annualized by multiplying by 347 days, consistent with the GHG Inventory and Adjusted BAU forecast (see Appendix A). GHG emission reductions were then calculated by multiplying the annual

²⁹ CAPCOA, *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, California Air Pollution Control Officers Association, December 2021. Available at: <http://www.airquality.org/air-quality-health/climate-change/ghg-handbook-caleemod>. Accessed January 2022.

³⁰ TAZs are comparable in size and shape to census tracts or block groups depending on the travel demand model used and level of modeling detail.

³¹ Fehr & Peers, LA County CAP VMT Reduction Estimate Summary, December 7, 2021.

VMT reductions by the Adjusted BAU passenger vehicle emission factors for each target year as derived from EMFAC2021 (see section B.1 above).³²

Assumptions

- The residential density within HQTAs as planned for in the County’s 2021 Housing Element Update would be 20 DU per acre.
- The typical residential density without the County’s 2021 Housing Element Update is 9.1 DU per acre.
- VMT reductions apply to home-based VMT occurring within the affected TOD and HQTAs in the County
- Daily VMT reductions are annualized by multiplying by 347 days.
- Passenger vehicle category corresponds to the EMFAC vehicle categories LDA, LDT1, LDT2, MCY, and MD.

References

- LA County GIS shapefile layer for the 2029 Housing Element Rezone Areas
- Major transit stop GIS layer developed as part of the LA County SB 743 VMT Tool (2020)
- California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures
Link: <http://www.airquality.org/air-quality-health/climate-change/ghg-handbook-caleemod>
- Fehr & Peers, LA County CAP VMT Reduction Estimate Summary (December 7, 2021)
- Fehr & Peers, LA County 2045 Climate Action Plan Update - VMT Technical Memorandum (January 6, 2022)
- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>

MEASURE T2: DEVELOP LAND USE PLANS ADDRESSING JOBS/HOUSING BALANCE & INCREASE MIXED USE

Table B-8: Measure T2 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	39,184
2035	37,267
2045	36,204

Description

Travel options that serve a variety of land uses and trip purposes can help shift some trips away from single-occupancy vehicles.

Performance Objectives

The goal of Measure T2 is to increase job density to 300 jobs per acre.

Modeling Approach

To quantify VMT reductions for Measure T2, appropriate equations were used based on factsheets in the CAPCOA handbook. Using data from an LA County GIS shapefile layer showing the 2029 Housing Element Rezone Areas and a major transit stop GIS layer developed as part of the LA County SB 743 VMT

³² CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

Tool released in late 2020, along with CAPCOA equations, percent reductions in VMT were estimated for Measure T2. Specifically, it was assumed that the transit mode share as planned for in the as planned for in the LA County SB 743 VMT Tool would be 27% compared to the typical transit mode share of 15%, resulting in a 31.8% reduction in passenger vehicle VMT for affected areas. This reduction was applied to the total VMT occurring within the affected TOD areas in the County.

VMT was calculated at the TAZ level. Once the percent VMT reductions were determined, based on the geographic scope and VMT category of Measure T2, the appropriate VMT was aggregated across the relevant TAZs within which transit mode shift would increase. Percent reductions were then applied to appropriate VMT sub-totals to obtain the VMT reduction estimates. The sum of these reductions was then subtracted from total light-duty vehicle VMT to estimate adjusted daily VMT. This adjusted daily VMT was then projected to obtain VMT reductions and adjusted totals in each analysis year (2030, 2035, and 2045). These VMT calculations were prepared by Fehr & Peers and supplied to the County.

GHG reductions from Measure T2 are calculated using daily VMT reductions provided by Fehr & Peers, as described above.³³ The average daily VMT reductions achieved through implementation of Measure T2 were annualized by multiplying by 347 days, consistent with the GHG Inventory and Adjusted BAU forecast (see Appendix A). GHG emission reductions were then calculated by multiplying the annual VMT reductions by the Adjusted BAU passenger vehicle emission factors for each target year as derived from EMFAC2021 (see section B.1 above).³⁴

Assumptions

- The transit mode share would increase from 15% to 27% under this measure, based on the County's 2021 Housing Element Update and the LA County SB 743 VMT Tool.
- VMT reductions apply to the total VMT occurring within the affected TOD areas in the County.
- Daily VMT reductions are annualized by multiplying by 347 days
- Passenger vehicle category corresponds to the EMFAC vehicle categories LDA, LDT1, LDT2, MCY, and MD.

References

- LA County GIS shapefile layer for the 2029 Housing Element Rezone Areas
- Major transit stop GIS layer developed as part of the LA County SB 743 VMT Tool (2020)
- 2012 California Household Travel Survey
Link: <https://www.nrel.gov/transportation/secure-transportation-data/tsdc-california-travel-survey.html>
- California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures
Link: <http://www.airquality.org/air-quality-health/climate-change/ghg-handbook-caleemod>
- Fehr & Peers, LA County CAP VMT Reduction Estimate Summary (December 7, 2021)
- Fehr & Peers, LA County 2045 Climate Action Plan Update - VMT Technical Memorandum (January 6, 2022)
- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>

Strategy 3: Reduce Single-Occupancy Vehicle Trips

³³ Fehr & Peers, LA County CAP VMT Reduction Estimate Summary, December 7, 2021.

³⁴ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

MEASURE T3: EXPAND BICYCLE & PEDESTRIAN NETWORK TO SERVE RESIDENTIAL, EMPLOYMENT, & RECREATIONAL TRIPS

Table B-9: Measure T3 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	2,955
2035	2,811
2045	2,730

Description

Travel options that serve a variety of land uses and trip purposes can help shift some trips away from single-occupancy vehicles.

Performance Objectives

The goal of Measure T3 is to increase bikeway miles by 500 percent by 2030.

Modeling Approach

To quantify VMT reductions for Measure T3, appropriate equations were used based on factsheets in the CAPCOA handbook. Using data from an LA County GIS shapefile layer showing the 2029 Housing Element Rezone Areas and the 2012 LA County Bike Plan, along with CAPCOA equations, percent reductions in VMT were estimated for Measure T3. Specifically, it was assumed that the bikeway network as planned for in the 2012 LA County Bicycle Master Plan would be increased by more than fivefold by 2030 as compared to existing conditions, resulting in a 0.5% reduction in countywide passenger vehicle VMT. This reduction was applied to the total VMT occurring within the County. The sum of these VMT reductions was then subtracted from total light-duty vehicle VMT to estimate adjusted daily VMT. This adjusted daily VMT was then projected to obtain VMT reductions and adjusted totals in each analysis year (2030, 2035, and 2045). These VMT calculations were prepared by Fehr & Peers and supplied to the County.

GHG reductions from Measure T3 are calculated using daily VMT reductions provided by Fehr & Peers, as described above.³⁵ The average daily VMT reductions achieved through implementation of Measure T3 were annualized by multiplying by 347 days, consistent with the GHG Inventory and Adjusted BAU forecast (see Appendix A). GHG emission reductions were then calculated by multiplying the annual VMT reductions by the Adjusted BAU passenger vehicle emission factors for each target year as derived from EMFAC2021 (see section B.1 above).³⁶

³⁵ Fehr & Peers, LA County CAP VMT Reduction Estimate Summary, December 7, 2021.

³⁶ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

Assumptions

- The County’s bikeway network as planned for in the 2012 LA County Bike Plan would be increased by more than fivefold by 2030 as compared to existing conditions.
- The reduction in VMT applies to the total VMT occurring within the County.
- Daily VMT reductions are annualized by multiplying by 347 days.
- Passenger vehicle category corresponds to EMFAC vehicle categories LDA, LDT1, LDT2, MCY, and MD.

References

- LA County GIS shapefile layer for the 2029 Housing Element Rezone Areas
- 2012 LA County Bicycle Master Plan
Link: <https://pw.lacounty.gov/tpp/bike/masterplan.cfm>
- California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measure
Link: <http://www.airquality.org/air-quality-health/climate-change/ghg-handbook-caleemod>
- Fehr & Peers, LA County CAP VMT Reduction Estimate Summary (December 7, 2021)
- Fehr & Peers, LA County 2045 Climate Action Plan Update - VMT Technical Memorandum (January 6, 2022)
- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>

MEASURE T4: BROADEN OPTIONS FOR TRANSIT, ACTIVE TRANSPORTATION, AND ALTERNATIVE MODES OF TRANSPORTATION

Table B-10: Measure T4 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	11,465
2035	10,904
2045	10,593

Description

Transit service, micro mobility services (emerging services that can be used to move people or goods, such as bike-share, scooter-share, and drone deliveries), and access to these transportation options can help reduce VMT.

Performance Objectives

The goal of Measure T4 is to double transit service hours from 560,000 to 1.12 million hours and to install bus-only lanes on 100 percent of all transit routes.

Modeling Approach

To quantify VMT reductions for Measure T4, appropriate equations were used based on factsheets in the CAPCOA handbook. VMT reductions and associated GHG emission reductions were quantified for two separate implementing actions which support Measure T4: Action T4.1 (Expand and improve frequency of existing network of County shuttles and explore new mobility services, such as micro transit, in unincorporated County areas) and Action T4.2 (Install bus-only lanes and signal prioritization

along major thoroughfares, and work with transit agencies and neighboring jurisdictions to plan and install full bus rapid transit infrastructure along priority corridors, as appropriate).

To calculate VMT reductions from action T4.1, Fehr & Peers used a major transit stop GIS layer developed as part of the LA County SB 743 VMT Tool released in late 2020 and information from the LA Metro NextGen Bus Plan (2020) and the LA Metro Long Range Transportation Plan (2020), along with CAPCOA equations. Specifically, the transit mode share of 4.6% per the 2012 California Household Travel Survey was used, and it was assumed that implementation of Action T4.1 would increase the total number of transit service hours in the unincorporated County from 560,000 to 1.12 million after transit expansion. This value is based on the Metro NextGen report (CITE). This increase in transit service hours would result in a 1.9% reduction in countywide passenger vehicle VMT. This reduction was applied to the total VMT occurring within the County. This VMT reduction was then subtracted from total light-duty vehicle VMT to estimate adjusted daily VMT. This adjusted daily VMT was then projected to obtain VMT reductions and adjusted totals in each analysis year (2030, 2035, and 2045).

To calculate VMT reductions from action T4.2, Fehr & Peers used a major transit stop GIS layer developed as part of the LA County SB 743 VMT Tool released in late 2020 and information from the LA Metro NextGen Plan and LA Metro Long Range Transportation Plan, along with CAPCOA equations. Specifically, the transit mode share of 4.6% per the 2012 California Household Travel Survey was used, and it was assumed that implementation of Action T4.2 would result in 100% of all transit routes in the unincorporated County will receive bus-only lanes, signal prioritization along major thoroughfares, and full bus rapid transit infrastructure along priority corridors. This value is based on the LA Metro NextGen Plan and LA Metro Long Range Transportation Plan. This infrastructure would result in a 0.6% reduction in total VMT occurring in the County's TOD areas and HQTAs. VMT was calculated at the TAZ level. Once the percent VMT reductions were determined, based on the geographic scope and VMT category of Measure T4.2, the appropriate VMT was aggregated across the relevant TAZs within which transit mode shift would increase. Percent reductions were then applied to appropriate VMT sub-totals to obtain the VMT reduction estimates. The sum of these reductions was then subtracted from total light-duty vehicle VMT to estimate adjusted daily VMT. This adjusted daily VMT was then projected to obtain VMT reductions and adjusted totals in each analysis year (2030, 2035, and 2045).

GHG reductions from Measure T4 are calculated using daily VMT reductions provided by Fehr & Peers, as described above.³⁷ The average daily VMT reductions achieved through implementation of Measure T4 were annualized by multiplying by 347 days, consistent with the GHG Inventory and Adjusted BAU forecast (see Appendix A). GHG emission reductions were then calculated by multiplying the annual VMT reductions by the Adjusted BAU passenger vehicle emission factors for each target year as derived from EMFAC2021 (see section B.1 above).³⁸

³⁷ Fehr & Peers, LA County CAP VMT Reduction Estimate Summary, December 7, 2021.

³⁸ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

Assumptions

- The baseline transit mode share is 4.6%, per the 2012 California Household Travel Survey.
- For Action T4.1, the total number of transit service hours in the unincorporated County would increase from 560,000 to 1.12 million after transit expansion.
- For Action T4.1, the reduction in VMT applies to the total VMT occurring within the County.
- For Action T4.2, 100% of all transit routes in the unincorporated County will receive bus-only lanes, signal prioritization along major thoroughfares, and full bus rapid transit infrastructure along priority corridors.
- For Action T4.2, VMT reductions apply to the relevant TAZs within which transit mode shift would increase.
- Daily VMT reductions are annualized by multiplying by 347 days.
- Passenger vehicle category corresponds to the EMFAC vehicle categories LDA, LDT1, LDT2, MCY, and MD.

References

- LA County GIS shapefile layer for the 2029 Housing Element Rezone Areas
- Major transit stop GIS layer developed as part of the LA County SB 743 VMT Tool (2020)
- LA Metro 2020 Long Range Transportation Plan, March 2020.
Link: <https://www.metro.net/about/plans/long-range-transportation-plan/>
- LA Metro NextGen Bus Plan, October 2020
Link: <https://www.metro.net/about/plans/nextgen-bus-plan/>
- 2012 California Household Travel Survey
Link: <https://www.nrel.gov/transportation/secure-transportation-data/tsdc-california-travel-survey.html>
- California Air Pollution Control Officers Association, *Quantifying Greenhouse Gas Mitigation Measures*
Link: <http://www.airquality.org/air-quality-health/climate-change/ghg-handbook-caleemod>
- Fehr & Peers, LA County CAP VMT Reduction Estimate Summary (December 7, 2021)
- Fehr & Peers, LA County 2045 Climate Action Plan Update - VMT Technical Memorandum (January 6, 2022)
- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>

Strategy 4: Institutionalize Low-Carbon Transportation

MEASURE T6: INCREASE ZEV MARKET SHARE AND REDUCE GASOLINE AND DIESEL FUEL SALES

Table B-11: Measure T6 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	481,735
2035	820,125
2045	1,441,291

Description

Increase countywide zero emission vehicle (ZEV) market share and vehicle penetration to the maximum extent feasible. Set targets for reducing total gasoline and diesel vehicle fuel sales in the County.

Performance Objectives

The goal of Measure T6 is to achieve a total market share of ZEVs for light-duty passenger vehicles of 30 percent by 2030, 50 percent by 2035, and 80 percent by 2045; transition 60 percent of light-duty vehicles in the County-owned fleet to ZEVs by 2030, 80 percent by 2035, and 100 percent by 2045; and 60 percent of all new light-duty vehicle sales are ZEVs by 2030 and 100 percent by 2035.

Modeling Approach

The Measure T6 calculations use Adjusted BAU GHG emissions from passenger vehicles as a baseline. To calculate the portion of the passenger vehicle fleet that are ZEVs under Measure T6, the passenger vehicle electrification performance goals for each future year were applied to the total vehicle population and countywide VMT outputs of the applicable EMFAC2021 model passenger vehicle types (LDA, LDT1, LDT2, MCY, and MDV). The remaining non-ZEV population and countywide VMT by fuel type (diesel, gasoline, and plug-in hybrid) was distributed proportionally for each vehicle type based on countywide fuel type distribution data from EMFAC2021. The adjusted ZEV population and VMT values with implementation of Measure T6 were then factored back in to the VMT-weighted emission factor calculations used for the Adjusted BAU forecast (see section B.2 above) to calculate new fleetwide vehicle emission rates under Measure T6. The recalculated weighted emission factors for passenger vehicles were then applied to the total passenger vehicle VMT by year to estimate GHG emissions with implementation of Measure T6.

Electric vehicle miles traveled (e-VMT) were then calculated for the Adjusted BAU forecast and for the scenario with implementation of Measure T6 by multiplying the total passenger vehicle VMT for each year by the electric vehicle share under each scenario. The e-VMT was then multiplied by electricity factors (kWh/mile) derived from EMFAC2021 to determine the total electricity consumption from electric vehicles. GHG emissions associated with this electricity use were estimated using the same participation rates and emission factors implemented under Measure ES2, as described below. Total GHG emission reductions from Measure T6 were calculated by subtracting GHG emissions associated with Measure T6 implementation for passenger vehicles and electric vehicle charging from GHG emissions under the Adjusted BAU forecast for passenger vehicles and electric vehicle charging.

GHG emissions reductions associated with electrification of LA County passenger fleet vehicles were also calculated for Measure T6. The total number of County fleet passenger vehicles was provided by the County of Los Angeles Internal Services Department (ISD).³⁹ Total VMT for these vehicles were estimated based on an annual average VMT per vehicle from the Alternative Fuels Data Center.⁴⁰ This average VMT value was then multiplied by the number of vehicles to estimate the total annual VMT for County fleet passenger vehicles. The baseline (Adjusted BAU) e-VMT was estimated based on the number of electric vehicle purchases in fiscal year 2019-20 as a percentage of total passenger fleet vehicles from the County's Annual Clean Fuel Sustainability Report. e-VMT under implementation of

³⁹ County of Los Angeles Internal Services, Annual Clean Fuel Sustainability Report, 2021.

⁴⁰ Alternative Fuels Data Center, Annual Average VMT per Vehicle, February 2020. Available at: <https://afdc.energy.gov/data/10309>. Accessed November 2021.

Measure T6 was estimated using the total passenger fleet vehicle VMT and electric vehicle fleet goals specific to the County fleet (60 percent by 2030, 80percent by 2035, and 100 percent by 2045). GHG emissions for electrified passenger fleet vehicles with implementation of Measure T6 were then calculated by multiplying total VMT by adjusted VMT-weighted emission factors from EMFAC2011 using the same method as discussed above for the Countywide fleet. These emissions were subtracted from the Adjusted BAU forecast GHG emissions for the County passenger vehicle fleet in order to estimate GHG emission reductions for Measure T6 for county fleet vehicles.

Measure T6 substantially reduces GHG emissions in the county; this measure is the most effective measure in the 2045 CAP.

Assumptions

- Increased electric vehicle adoption displaces all other vehicle types (diesel, gasoline, plug-in hybrid) and non-ZEV VMT is redistributed proportional to each fuel type’s share of total population and VMT (from EMFAC2011).
- The efficiency of electric vehicles remains constant throughout all future years.
- The County passenger fleet vehicle population remains constant through 2045.
- The County passenger fleet vehicle annual average VMT per vehicle value of 11,467 remains constant through 2045.
- CPA and SCE emission factors for electricity are the same as those reported in section B.1 below.
- CPA participation rates after implementation of Measure ES2.

Data Sources

- EMFAC2021 Model
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>
- County of Los Angeles Internal Services, Annual Clean Fuel Sustainability Report, 2021.
- Alternative Fuels Data Center, Annual Average VMT per Vehicle
Link: <https://afdc.energy.gov/data/10309>
- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011

MEASURE T7: ELECTRIFY COUNTY FLEET VEHICLES

Table B-12: Measure T7 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	27,291
2035	19,701
2045	5,656

Description

Electrify the County bus fleet and shuttles.

Performance Objectives

The goal of this measure is to electrify the entire County bus and shuttle fleet by 2030 and to electrify 15 of the County's inmate buses by 2030, 30 inmate buses by 2035, and 68 inmate buses by 2045.

Modeling Approach

The Measure T7 calculations use Adjusted BAU fuel use and GHG emissions from public transit buses as a baseline. Measure T7 assumes a 100% electrification rate of all County fleet buses by 2030. To calculate GHG emission reductions associated with Measure T7, fuel use from diesel, gasoline, and compressed natural gas under the Adjusted BAU forecast was converted to electricity using specific energy effectiveness ratios (EERs) by fuel type and conversion factors from gallons to British thermal units (Btu) and Btu to electricity use.^{41,42} The EERs account for the change in vehicle energy efficiency when substituting one fuel for another. GHG emissions associated with implementation of Measure T7 were calculated using the same participation rates and emission factors implemented under Measure ES2, as discussed below. GHG emissions after implementation of Measure T7 were then subtracted from the Adjusted BAU GHG emissions to estimate the emission reductions from Measure T7.

Measure T7 also includes electrification of the County's inmate bus fleet. The total number of inmate buses in the County's fleet (88) was provided by the County of Los Angeles Sheriff's Department.⁴³ Annual VMT for the County's inmate bus fleet was estimated based on an annual average VMT value of 12,000 per bus from the Alternative Fuels Data Center.⁴⁴ The average inmate bus VMT was then multiplied by the total number of inmate buses to estimate the total annual VMT for inmate buses. The baseline e-VMT was assumed to be zero given that the Sheriff's Department does not currently operate any electric inmate buses. e-VMT from implementation of Measure T7 was determined using data provided by the County Sheriff's Department on planned electrification of the inmate bus fleet: 15 buses electrified by 2030, 30 buses electrified by 2035, and 68 buses electrified by 2045.⁴⁵ GHG emissions associated with the electrification of inmate buses under Measure T7 were calculated using weighted average bus emission factors from EMFAC2021 multiplied by the annual diesel VMT and e-VMT; these emissions were then subtracted from the GHG emissions in the Adjusted BAU forecast to determine emission reductions.

Assumptions

- Complete electrification of the transit bus fleet by 2030.
- CPA and SCE emission factors for electricity are the same as those reported in section B.1 below.
- CPA participation rates after implementation of Measure ES2.
- EERs applied to each non-electric fuel type to convert to electricity.

⁴¹ Navius Research, Analysis of Energy Effectiveness Ratios for Light- and Heavy-Duty Vehicles. November 6, 2018. Available at: <https://www.naviusresearch.com/wp-content/uploads/2018/11/BC-EER-Review-Final-Report-2018-11-06.pdf>. Accessed November 2021.

⁴² Alternative Fuels Data Center, Fuel Properties. January 2021. Available at: <https://afdc.energy.gov/fuels/properties>. Accessed November 2021.

⁴³ County of Los Angeles Internal Services, Annual Clean Fuel Sustainability Report, 2021.

⁴⁴ Alternative Fuels Data Center, Annual Average VMT per Vehicle, February 2020. Available at: <https://afdc.energy.gov/data/10309>. Accessed November 2021.

⁴⁵ County of LA Sheriff's Department email correspondence (2021).

- The County inmate bus fleet vehicle annual average VMT per bus value of 12,000 remains constant through 2045.

References

- Navius Research, Analysis of Energy Effectiveness Ratios for Light- and Heavy-Duty Vehicles
Link: <https://www.naviusresearch.com/wp-content/uploads/2018/11/BC-EER-Review-Final-Report-2018-11-06.pdf>.
- Alternative Fuels Data Center, Fuel Properties.
Link: <https://afdc.energy.gov/fuels/properties>. Accessed November 2021.
- County of Los Angeles Internal Services, Annual Clean Fuel Sustainability Report, 2021.
- Alternative Fuels Data Center, Annual Average VMT per Vehicle
Link: <https://afdc.energy.gov/data/10309>.
- County of LA Sheriff's Department email correspondence (2021)
- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011

MEASURE T8: ACCELERATE FREIGHT DECARBONIZATION

Table B-13: Measure T8 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	86,168
2035	103,528
2045	164,707

Description

Incentivize and implement freight decarbonization technologies, specifically focusing on charging infrastructure.

Performance Objectives

The goal of this measure is to achieve a total market share of ZEVs for medium- and heavy-duty vehicles of 40 percent by 2030, 60 percent by 2035, and 85 percent by 2045; transition 60 percent of medium- and heavy-duty vehicles in the County-owned fleet to ZEVs by 2030, 80 percent by 2035, and 100 percent by 2045; and 100 percent of the drayage truck fleet is ZEV by 2035.

Modeling Approach

The Measure T8 calculations use Adjusted BAU GHG emissions from medium- and heavy-duty trucks as a baseline. To calculate the portion of the medium- and heavy-duty truck fleet that are ZEVs under Measure T8, the truck electrification performance goals for each future year were applied to the total vehicle population and countywide VMT outputs of the applicable EMFAC2021 model medium- and heavy-duty vehicle types (LHDT1, LHDT2, MHDT, HHDT, and MH). The remaining non-ZEV population and countywide VMT by fuel type (diesel, gasoline, and natural gas) was distributed proportionally for each vehicle type based on countywide fuel type distribution data from EMFAC2021. The adjusted ZEV

population and VMT values with implementation of Measure T8 were then factored back into the VMT-weighted emission factor calculations used for the Adjusted BAU forecast (see section B.2 above) to calculate new fleetwide vehicle emission rates under Measure T8. The recalculated weighted emission factors for trucks were then applied to the total medium- and heavy-duty truck VMT by year to estimate GHG emissions with implementation of the Measure T8.

The e-VMT were then calculated for the Adjusted BAU forecast and for the scenario with implementation of Measure T8 by multiplying the total medium- and heavy-duty truck VMT for each year by the electric vehicle share under each scenario.⁴⁶ The e-VMT was then multiplied by electricity factors (kWh/mile) derived from EMFAC2021 to determine the total electricity consumption from electric vehicles. GHG emissions associated with this electricity use were estimated using the same participation rates and emission factors implemented under Measure ES2, as described below. Total GHG emission reductions from Measure T8 were calculated by subtracting GHG emissions associated with Measure T8 implementation for medium- and heavy-duty trucks and electric vehicle charging from GHG emissions under the Adjusted BAU forecast for medium- and heavy-duty trucks and electric vehicle charging.

GHG emissions reductions associated with electrification of LA County medium- and heavy-duty fleet vehicles were also calculated for Measure T8. The total number of County fleet medium- and heavy-duty trucks was provided by ISD.⁴⁷ Total VMT for these vehicles were estimated based on an annual average VMT per truck from the Alternative Fuels Data Center.⁴⁸ This average VMT value was then multiplied by the number of trucks to estimate the total annual VMT for County medium- and heavy-duty fleet vehicles. The baseline (Adjusted BAU) e-VMT was estimated based on the number of electric truck purchases in fiscal year 2019-20 as a percentage of total medium- and heavy-duty fleet vehicles from the County's Annual Clean Fuel Sustainability Report. e-VMT under implementation of Measure T8 was estimated using the total medium- and heavy-duty fleet vehicle VMT and electric truck fleet goals specific to the County fleet (60 percent by 2030, 80 percent by 2035, and 100 percent by 2045). GHG emissions for electrified medium- and heavy-duty fleet vehicles with implementation of Measure T8 were then calculated by multiplying total VMT by adjusted VMT-weighted emission factors from EMFAC2011 using the same method as discussed above for the Countywide fleet. These emissions were subtracted from the Adjusted BAU forecast GHG emissions for the County medium- and heavy-duty vehicle fleet in order to estimate GHG emission reductions for Measure T8 for county fleet vehicles.

Assumptions

- Increased electric vehicle adoption displaces all other vehicle types (diesel, gasoline, natural gas) and VMT is redistributed proportional to the fuel type's share of total population and VMT.
- The County medium- and heavy-duty fleet vehicle population remains constant through 2045.

⁴⁶ CARB, EMFAC2021 Model. 2021. Available at: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>. Accessed October 2021.

⁴⁷ County of Los Angeles Internal Services, Annual Clean Fuel Sustainability Report, 2021.

⁴⁸ Alternative Fuels Data Center, Annual Average VMT per Vehicle, February 2020. Available at: <https://afdc.energy.gov/data/10309>. Accessed November 2021.

- The County medium- and heavy-duty fleet vehicle annual average VMT per vehicle value of 16,326 remains constant through 2045.
- CPA and SCE emission factors for electricity are the same as those reported in section B.1 above.
- CPA participation rates after implementation of Measure ES2.

Data Sources

- EMFAC2021 Mode
Link: <https://arb.ca.gov/emfac/emissions-inventory/4c9f04282a1f85d62a27721058b5a3bb6fd22fb9>
- County of Los Angeles Internal Services, Annual Clean Fuel Sustainability Report, 2021
- Alternative Fuels Data Center, Annual Average VMT per Vehicle
Link: <https://afdc.energy.gov/data/10309>.
- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011

MEASURE T9: EXPAND USE OF ZERO-EMISSION TECHNOLOGIES FOR OFF-ROAD VEHICLES & EQUIPMENT

Table B-14: Measure T9 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	20,933
2035	32,729
2045	47,330

Description

Prohibit the sale of gas- and diesel-powered small off-road equipment and encourage the use of zero-emission and near-zero-emission construction, agriculture, and manufacturing equipment.

Performance Objectives

The goal of this measure is to electrify 50 percent of the County’s total off-road vehicle and equipment fleet by 2030, 75 percent by 2035, and 100 percent by 2045.

Modeling Approach

The Measure T9 calculations use Adjusted BAU off-road vehicle fuel consumption and GHG emissions as a baseline for estimating GHG emission reductions. Measure T9 aims to electrify the County’s off-road vehicles and equipment by an increasing percentage in each future year. To calculate GHG emission reductions associated with Measure T9, fuel use from diesel, gasoline, and compressed natural gas under the Adjusted BAU forecast was multiplied by electrification rates by target year and then converted to electricity using specific EERs by fuel type and conversion factors from gallons to Btu and

Btu to electricity use.^{49,50} GHG emissions from electricity under Measure T9 were calculated using the same participation rates and emission factors implemented under Measure ES2, as discussed below. Diesel, gasoline, and natural gas GHG emissions were calculated using emission factors derived from CARB's OFFROAD2017 ORION model.⁵¹ GHG emissions after implementation of Measure T9 were then subtracted from the Adjusted BAU GHG emissions to estimate the emission reductions from Measure T9.

Assumptions

- Natural gas-fuelled equipment is not displaced by electric equipment.
- CPA and SCE emission factors for electricity are the same as those reported in section B.1 below.
- CPA participation rates after implementation of Measure ES2.
- EERs applied to each non-electric fuel type to convert to electricity.

References

- CARB OFFROAD ORION Model
Link: <https://www.arb.ca.gov/orion/Summary>
- Navius Research, Analysis of Energy Effectiveness Ratios for Light- and Heavy-Duty Vehicles
Link: <https://www.naviusresearch.com/wp-content/uploads/2018/11/BC-EER-Review-Final-Report-2018-11-06.pdf>.
- Alternative Fuels Data Center, Fuel Properties.
Link: <https://afdc.energy.gov/fuels/properties>. Accessed November 2021.
- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011

Building Energy and Water

Building Energy and Water Measure Order of Implementation

To avoid double counting GHG emissions reductions for measures that reduce emissions in building energy and water, these measures account for overlapping effects. For example, Measure ES2 (Procure Zero Carbon Electricity) is implemented first and includes electricity emission factors and CPA participation rates that are applied through the remaining building energy and water measures. Further, each measures' baseline activity data (i.e., electricity and natural gas consumption) is affected by the ordering of the measures. For example, grid electricity savings from solar production under measure ES3 (Increase Renewable Energy Production) are subtracted from the adjusted BAU electricity activity data for the relevant building sector and the resulting electricity usage is used as the new "baseline" activity data for the next measure, Measure E4 (Improve Energy Efficiency of Existing

⁴⁹ Navius Research, Analysis of Energy Effectiveness Ratios for Light- and Heavy-Duty Vehicles. November 6, 2018. Available at: <https://www.naviusresearch.com/wp-content/uploads/2018/11/BC-EER-Review-Final-Report-2018-11-06.pdf>. Accessed November 2021.

⁵⁰ Alternative Fuels Data Center, Fuel Properties. January 2021. Available at: <https://afdc.energy.gov/fuels/properties>. Accessed November 2021.

⁵¹ CARB, OFFROAD ORION. 2018. Available at: <https://ww2.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools>. Accessed January 2021.

Buildings). After Measure E4 is implemented, the new “baseline” activity data is recalculated and used as the new “baseline” total electricity usage for Measure E1 (Transition Existing Buildings to All-Electric). For calculation purposes, measures were assumed to be implemented in the following order:

1. Measure ES2: Procure Zero Carbon Electricity
2. Measure ES3: Increase Renewable Energy Production
3. Measure E4: Improve Energy Efficiency of Existing Buildings
4. Measure E1: Transition Existing Buildings to All-Electric
5. Measure E2: Standardize All-Electric New Development
6. Measure E5: Increase Use of Recycled Water and Gray Water Systems

Note that Measure E2 (Standardize All-Electric New Development) is independent of the other measures because it exclusively applies to new development and therefore does not use the same baseline activity data as the other measures.

Strategy 5: Decarbonize Buildings

MEASURE E1: TRANSITION EXISTING BUILDINGS TO ALL-ELECTRIC

Table B-16: Measure E1 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	179,051
2035	288,562
2045	498,512

Description

As the carbon intensity of grid-supplied electricity decreases, decarbonization must be combined with building electrification, shifting more load toward cleaner sources. This measure aims to electrify existing buildings and therefore reduce natural gas combustion and associated GHG emissions.

Performance Objectives

The goal of Measure E1 is to electrify 25 percent of all existing residential buildings by 2030, 40% by 2035, and 70% by 2045; and to electricity 15 percent of all existing nonresidential buildings by 2030, 25% by 2035, and 40% by 2045.

Modeling Approach

The performance objectives were derived using SCE’s Pathway to 2045 Whitepaper electrification targets, as stated in Table 1 of the whitepaper’s appendices. Targets are identified for the space and water heating end uses for both residential and commercial buildings. Using data from the 2012 Commercial Buildings Energy Consumption Survey (CBECS) and the 2015 Residential Energy

Consumption Survey (RECS), these end use electrification targets were adjusted to overall residential and nonresidential natural gas consumption for buildings in the “Mixed-dry/Hot-dry” climate region as defined by the U.S. Energy Information Administration (which includes LA County).⁵²

The Measure E1 calculations use the activity data (electricity and natural gas) and GHG emissions for existing residential and non-residential land uses after implementation of Measure ES2 (Procure Zero Carbon Electricity) as a baseline. The baseline year for existing development is assumed to be 2023 because this is the earliest date that the Draft 2045 CAP could be adopted and go into effect. In other words, Measure E1 would apply to the built environment through the end of 2022. Electricity emissions before implementation of Measure E1 were calculated using the same participation rates and emission factors implemented under Measure ES2. To calculate the reduction in natural gas use and increase in electricity use under Measure E1, natural gas use in applicable buildings was converted to electricity use by multiplying the number of therms consumed by the electrification percentage for each building type (residential and non-residential) for each target year, and then converting the displaced natural gas to electricity using a standard conversion factor of 29.3 kWh per therm.⁵³ GHG emissions after implementation of Measure E1 were then calculated using the same participation rates and emission factors implemented under Measure E1 and subtracted from the post-ES2 emissions to estimate the GHG reductions produced by Measure E1.

Assumptions

- Performance goals are based on SCE’s Pathway to 2045 Whitepaper electrification goals for residential and commercial space and water heating, adjusted to average end use profiles for natural gas energy consumption in residential and commercial buildings in the “Mixed-dry/Hot-dry” climate region
- CPA and SCE emission factors for electricity are the same as those reported in section B.1 above.
- CPA participation rates after implementation of Measure ES2.
- There is no efficiency loss when converting natural gas to electricity.
- Existing development represents emissions and activity data in 2023.

Data Sources

- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011
- Southern California Edison, Pathway 2045 Appendices, Table 1
Link: <https://www.edison.com/home/our-perspective/pathway-2045.html>
- U.S. Energy Information Administration, 2012 Commercial Buildings Energy Consumption Survey (CBECS), Table E7
Link: <https://www.eia.gov/consumption/commercial/data/2012/index.php?view=consumption#e1-e11>
- U.S. Energy Information Administration, 2015 Residential Energy Consumption Survey (RECS), Table CE4.5
Link: <https://www.eia.gov/consumption/residential/data/2015/index.php?view=consumption#undefined>

⁵² For example, the SCE Pathway targets are 36% electric commercial space heating and 7% electric commercial water heating by 2035; in the Mixed-dry/Hot-dry climate region, space heating represents 35% of total commercial natural gas use and water heating represents 31% of total commercial natural gas use; the calculation for the total commercial building electrification target is $36\% * 35\% + 7\% * 31\% = 15\%$.

⁵³ UC Irvine Physics and Astronomy, Energy Units and Conversions. Available at: <https://www.physics.uci.edu/~silverma/units.html>. Accessed November 2021.

- UC Irvine Physics and Astronomy, Energy Units and Conversions
Link: <https://www.physics.uci.edu/~silverma/units.html>
- Climate Registry
Link: <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf> (the 2018 document was the latest available at the time the inventories were prepared)

MEASURE E2: STANDARDIZE ALL-ELECTRIC NEW DEVELOPMENT

Table B-17: Measure E2 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	7,402
2035	12,529
2045	22,614

Description

This measure aims to electrify all new development starting in 2025.

Performance Objectives

The goal of Measure E2 is to electrify all new residential and non-residential buildings starting in 2025.

Modeling Approach

The Measure E2 calculations use Adjusted BAU activity data (electricity and natural gas) and GHG emissions after implementation of Measure ES2 for new residential and non-residential land uses as a baseline. New residential and non-residential energy use was calculated by multiplying the new building square footage⁵⁴ by the EUI for each land use type (single-family residential, multi-family residential, commercial, and manufacturing / industrial). GHG emissions for new development were then calculated using the same participation rates and emission factors implemented under Measure ES2. To calculate the reduction in natural gas use and increase in electricity use under Measure E2, natural gas use in applicable buildings was converted to electricity use by multiplying the number of therms consumed by the electrification percentage for each building type (residential and non-residential) for each target year and then converting the displaced natural gas to electricity using a standard conversion factor of 29.3 kWh per therm.⁵⁵ GHG emissions after implementation of Measure E2 were then calculated using the same participation rates and emission factors implemented under Measure ES2 and subtracted from the post-ES2 emissions to estimate the GHG reductions produced by Measure E2. Electrification of new development starts in 2025 and emissions reductions in each of the target years are calculated as cumulative reductions; for example, total annual GHG emission reductions in 2030 account for all new building electrification for the years 2025 through 2030.

⁵⁴ UCLA Institute of Environmental Studies, Analysis of Los Angeles County Parcel Assessor’s Data. 2018.

⁵⁵ UC Irvine Physics and Astronomy, Energy Units and Conversions. Available at: <https://www.physics.uci.edu/~silverma/units.html>. Accessed November 2021.

Assumptions

- CPA and SCE emission factors for electricity are the same as those reported in section B.1 above.
- CPA participation rates after implementation of Measure ES2.
- There is no efficiency loss when converting natural gas to electricity.
- Electrification of new development begins in 2025.
- Annual GHG emission reductions for each target year (2030, 2035, and 2045) reflect all buildings electrified in all previous years (e.g., all buildings electrified from 2025-2030 contribute to annual emission reductions in 2030).

Data Sources

- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011
- UCLA analysis of Los Angeles County Parcel Assessor’s Data
Provided by UCLA Institute of Environmental Studies
- UC Irvine Physics and Astronomy, Energy Units and Conversions
Link: <https://www.physics.uci.edu/~silverma/units.html>
- Climate Registry
Link: <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf> (the 2018 document was the latest available at the time the inventories were prepared)

Strategy 6: Improve Energy Efficiency of Existing Buildings

MEASURE E4: IMPROVE ENERGY EFFICIENCY OF EXISTING BUILDINGS

Table B-19: Measure E4 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	8,738
2035	19,459
2045	33,918

Description

Retrofit existing building stock to reduce overall countywide energy use.

Performance Objectives

The goal of Measure E4 is to improve the energy efficiency of existing residential and non-residential buildings by performing energy efficiency retrofits in 10 percent of existing buildings by 2030, 15 percent by 2035, and 20 percent by 2045.

Modeling Approach

The Measure E4 calculations use the activity data (electricity and natural gas) and GHG emissions for existing residential and non-residential land uses after implementation of Measure ES2 (Procure Zero Carbon Electricity) and Measure ES3 (Increase Renewable Energy Production) as a baseline. The

baseline year for existing development is assumed to be 2023 because that is the earliest date that the Draft 2045 CAP could be adopted and go into effect. In other words, Measure E4 would apply to the built environment through the end of 2022. This new “baseline” energy use was then multiplied by an assumed eligibility rate (i.e., the portion of buildings eligible for retrofits [based on building vintage, incentives available, income level, etc.]) and then by the participation rate (i.e., the portion of eligible residential and nonessential buildings actually performing a retrofit) to determine the total building energy usage subject to energy retrofits under Measure E4. Electricity and natural gas savings resulting from implementation of Measure E4 were then calculated by multiplying these energy usage values (electricity and natural gas) by the percent improvement in energy efficiency for each target year under Measure E4 implementation. Electricity and natural gas emissions before implementation of Measure E4 were calculated using the same participation rates and emission factors implemented under Measure ES2 and Measure ES3. GHG emissions after implementation of Measure E4 were then calculated using the same participation rates and emission factors implemented under Measure ES2 and Measure ES3 and subtracted from the post-ES3 emissions to estimate the GHG reductions produced by Measure E4. GHG emissions for natural gas savings were calculated using the emission factors of 0.00531 MTCO₂e per therm for residential and commercial buildings and 0.00532 MTCO₂e per therm for industrial buildings.

Assumptions

- CPA and SCE emission factors for electricity are the same as those reported in section B.1 above.
- CPA participation rates after implementation of Measure ES2.
- Existing building stock represents the built environment through the year 2023.
- The energy efficiency eligibility rate is 25 percent for both residential and nonresidential buildings for all target years.
- The participation rate for eligible buildings is 40 percent in 2030, 60 percent in 2035, and 80 percent in 2045. When applied to the percentage of buildings that are eligible for a retrofit, 10 percent of buildings are retrofit by 2030, 15 percent of buildings are retrofit by 2035, and 20 percent of buildings are retrofit by 2045.
- Energy efficiency retrofits performed before 2030 reduce energy use by 10 percent, retrofits performed from 2031-2035 reduce energy use by 15 percent, and retrofits performed from 2036-2045 reduce energy use by 20 percent.

Data Sources

- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>
- CPA Member Status Report, July 28, 2011
- Climate Registry
Link: <https://www.theclimateregistry.org/wp-content/uploads/2018/06/The-Climate-Registry-2018-Default-Emission-Factor-Document.pdf> (the 2018 document was the latest available at the time the inventories were prepared)

Strategy 7: Conserve Water

MEASURE E6: REDUCE INDOOR AND OUTDOOR WATER CONSUMPTION

Table B-20: Measure E6 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	10,371
2035	12,224
2045	0

Description

Reducing indoor and outdoor water consumption is essential as the State experiences drought after drought. Not only will water conservation improve regional resiliency, it will also reduce GHG emissions through the reduction of energy consumption associated with processing, treatment, and conveyance of water and wastewater.

Performance Objectives

The goal of Measure E6 is to reduce water use to less than 110 gallons per capita per day (GPCD) by 2030, less than 100 GPCD by 2035, and less than 85 GPCD by 2045.

Modeling Approach

Water use and the associated energy use (electricity and natural gas) to distribute and treat water supplied to the County were estimated for both the Adjusted BAU forecast scenario and the Measure E6 implementation scenario. Metropolitan Water District’s (MWD) historical water use was used as a proxy for the unincorporated LA County region.⁵⁶ Water use in gallons per capita per day (GPCD) under the Adjusted BAU forecast was projected for each future year using unincorporated County population and MWD’s 2019 per capita water use (121 GPCD), which was then converted to acre-feet per year (AF/yr). Water use associated with the implementation of Measure E9 was estimated using the target GPCD (listed above) and population, which was then converted to AF/yr.

The electricity and natural gas use resulting from each of the water use scenarios (Adjusted BAU and Measure E9 implementation) was estimated for both residential and non-residential land uses. Energy intensity factors from The Pacific Institute’s *The Future of California’s Water-Energy-Climate Nexus* report were used to estimate the energy use associated with the treatment, distribution, end-use, and collection of water in the region, as well as the treatment of the resulting wastewater.⁵⁷ Data from the LA County Waterworks 2020 Urban Water Management Plan (UWMP) was used to get the following regionally specific information, which was then applied to each water use scenario: the ratio of total water demand met by locally pumped groundwater (31 percent), the ratio of total water used that is collected as wastewater (59 percent), the ratio of collected wastewater that goes through secondary treatment (100 percent), and the water used by residential versus non-residential land uses (76 percent

⁵⁶ MWD, 2020 Urban Water Management Plan. June 2021. Available at: <https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf>. Accessed November 2021.

⁵⁷ The Pacific Institute, *The Future of California’s Water-Energy-Climate Nexus*. September 2021. Available at: https://pacinst.org/wp-content/uploads/2021/09/Water-Energy-Report_Sept-2021.pdf. Accessed November 2021.

and 24 percent, respectively).^{58,59} Averages were used to estimate the amount of residential water that is heated versus non-residential water that is heated.^{60,61}

To estimate the GHG reductions associated with Measure E6, GHG emissions associated with following two scenarios were quantified and the difference between the two was taken: implementation of Measures ES2, E1, E2, and ES3 and implementation of Measures ES2, E1, E2, ES3, and E6. In each scenario, water use was assigned to existing or new development using forecasted residential and non-residential land use percentages. To account for implementation of Measure E1, the appropriate percentage of natural gas use associated with water use in existing development was converted to electricity use. For example, 25 percent of residential natural gas use (therms) associated with water use in existing development was converted to kWh and added to existing residential development's electricity use associated with water. The electricity use resulting from implementation of Measure E1 (electricity use associated with water use in existing residential and non-residential development) was then multiplied by emission factors which accounted for Measures ES2 and ES3; i.e., the percentage of electricity supplied by solar and the participation rate in each tier of CPA electricity. The natural gas use resulting from implementation of Measure E1 was multiplied by standard emission factors associated with each land use type. To account for implementation of Measure E2, all natural gas use associated with water use in new development was converted to electricity and added to new development's electricity use associated with water. The combined electricity use resulting from implementation of Measure E2 was then multiplied by emission factors which accounted for Measures ES2 and ES3; i.e., the percentage of electricity supplied by solar and the participation rate in each tier of CPA electricity. Emissions associated with existing development were then summed with emissions associated with new development for each scenario.

Assumptions

- Unincorporated LA County water use profile is equivalent to that of the MWD.
- Unincorporated LA County falls within the South Coast and South Lahontan water regions, thus energy intensity factors for each region were averaged.
- Unincorporated LA County water use profile can be represented by LA County Waterworks Districts data.
- No efficiency losses result from natural gas conversion to electricity (Measure E1).
- 33 percent of residential indoor water use is heated and 22 percent of non-residential indoor water use is heated.
- CPA and SCE emission factors for electricity are the same as those reported in section B.1 above.
- CPA participation rates after implementation of Measure ES2.

Sources

- SCAG Population Projections
Link: <http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting>

⁵⁸ LA County Waterworks Districts, 2020 Urban Water Management Plans. October 2021. Available at: <https://dpw.lacounty.gov/wwd/web/Publications/WMP.aspx>. Accessed November 2021.

⁵⁹ CA Department of Water Resources, Water Use Efficiency Data Portal. 2022. Available at: <https://wuedata.water.ca.gov/default.asp>. Accessed November 2021.

⁶⁰ Water Research Foundation, Residential End Uses of Water, Version 2, Executive Report. April 2016. Available at: https://www.circleofblue.org/wp-content/uploads/2016/04/WRF_REU2016.pdf. Accessed November 2021.

⁶¹ Yudelson, 2010. Available at: <http://greenbuildconsult.com/pdfs/GreenWater.pdf>. Accessed November 2021.

- MWD 2020 UWMP
Link: <https://www.mwdh2o.com/media/21641/2020-urban-water-management-plan-june-2021.pdf>
- LA County Waterworks Districts 2020 UWMP
Link: <https://dpw.lacounty.gov/wwd/web/Publications/WMP.aspx>
- Water Use Efficiency Data (WUEdata) Portal
Link: https://wuedata.water.ca.gov/uwmp_export_2020.asp
- Water-Energy-Climate Nexus Report
Link: https://pacinst.org/wp-content/uploads/2021/09/Water-Energy-Report_Sept-2021.pdf
- Residential End Uses of Water Report
Link: https://www.circleofblue.org/wp-content/uploads/2016/04/WRF_REU2016.pdf
- AquaCraft Residential End Uses of Water Study Update, 2014
Link: NEED LINK
- Yudelson, REPORT TITLE 2010
Link: NEED LINK
- SCE Emission Factors
Link: <https://www.edison.com/content/dam/eix/documents/sustainability/eix-esg-pilot-quantitative-section-sce.pdf>
- CPA Emission factors
Link: <https://www.theclimateregistry.org/our-members/cris-public-reports/>

Waste

Strategy 8: Minimize Waste and Recover Energy and Materials from the Waste Stream

MEASURE W1: INSTITUTIONALIZE SUSTAINABLE WASTE SYSTEMS & PRACTICES

Table B-21: Measure W1 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	54,367
2035	94,152
2045	113,165

Description

Undertake actions that result in sustainable waste systems countywide. Responsible and sustainable waste practices are learned behaviors, which the County can facilitate through outreach, education, and mandates. Through action taken at the County level, waste-conscious habits and thoughtful consumption can become the default.

Performance Objectives

The goal of measure W1 is to reduce total landfill methane emissions from the 2015 baseline 35 percent by 2030, 45 percent by 2035, and 60 percent by 2045 by decreasing overall per capita waste generation from 2015 levels 25 percent by 2030, 30 percent by 2035, and 35 percent by 2045.

Modeling Approach

Target waste generation in units of tons per capita were estimated for each future year using the 2015 baseline annual waste generation rate per capita (0.86 tons) and the target percent reduction from the 2015 baseline, which was then converted to total generation in tons using forecasted population. A ratio of BAU waste generation and BAU emissions to targeted waste generation was then used to estimate the emissions associated with waste generation once Measure W3 has been implemented. To estimate reductions associated with new development versus existing development, a ratio of incremental population growth to total population in each of the target years was used.

Assumptions

- Solid waste diversion rate and organics diversion rate are assumed to remain constant at 70% and 38% respectively.
- For each ton of solid waste not placed in a landfill, 0.44 MTCO₂e is saved (based on the Adjusted BAU forecast for the waste sector; see Appendix A).

Sources

- SCAG Population Projections
Link: <http://gisdata.scag.ca.gov/Pages/SocioEconomicLibrary.aspx?keyword=Forecasting>

MEASURE W2: INCREASE ORGANICS WASTE DIVERSION

Table B-21: Measure W2 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO ₂ E)
2030	43,161
2035	55,746
2045	79,522

Description

Provide services for diverting yard waste, food scraps, and compostable paper from landfills to beneficial use, including compost, food rescue, and energy production.

Performance Objectives

The goals of measure W2 are to 1) reduce annual organics waste disposal from the 2015 baseline 85% (360,000 tons) by 2030, 90% (415,000 tons) by 2035, and 95% (455,000 tons) by 2045; 2) produce biomethane by anaerobically digesting 25% of total annual new food waste diverted under this measure (30,000 tons) by 2030, 30% (40,000 tons) by 2035, and 50% (60,000 tons) by 2045; and 3) rescue and divert 10% of total annual new food waste diverted under this measure (10,000 tons) by 2030, 15% (15,000 tons) by 2035, and 25% (25,000 tons) by 2045.

Modeling Approach

Total waste disposal in 2015 and under BAU conditions for each future year was multiplied by 48.7% to determine the portion of total waste disposed that is organic; this is the organics fraction for the entire County, based on PW's 2020 Annual Update County of Los Angeles Countywide Organic Waste Management Plan (Appendix A, Table 3). The 2015 organics disposal tonnage was then multiplied by the organics disposal target percent reduction from the 2015 baseline for each future year to determine the target organics disposal rate for 2030, 2035, and 2045. These numbers were subtracted from the total BAU organics disposal tonnages to estimate the total new tonnage diverted under this measure. Organic waste already diverted under Measure W1 was subtracted from these values to determine the new organics diversion amounts required by Measure W2.

To estimate the amount of organic waste going to food rescue and anaerobic digestion, the total new organics diversion tonnages were multiplied by the performance goals indicated above. The remaining amount was assumed to be composted.

CARB's *Benefits Calculator Tool: Organics Programs* for the California Climate Investments Program was used to estimate GHG emission reductions for composting and anaerobic digestion; CARB's *Benefits Calculator Tool for the Food Waste Prevention and Rescue Program* was used to estimate GHG emission reductions for food waste rescue. The total tonnages for compost, anaerobic digestion, and food waste rescue were entered into the CARB tools to estimate GHG emission reductions for each future target year. It was assumed that composting was windrow composting and the composition of food waste and green waste in the organic material match the countywide values as reported by PW. For anaerobic digestion, it was assumed that half of organic material would go to standalone anaerobic digestion facilities and the remaining half of organic material would go to co-digestion facilities (like a wastewater treatment plant).

Assumptions

- Additional organics diversion through Measure W2 occurs after Measure W1 (for purposes of the calculation)
- The percentage of unincorporated County's total waste disposal stream that is organic is 48.7%, equal to the Countywide average.
- Food waste and green waste represent 14.9% and 33.8% of the unincorporated County's total waste disposal, respectively (Countywide average).
- 100% of new composting would be windrow composting
- 50% of new anaerobic digestion would be standalone and 50% would be co-digestion
- GHG emission factors, avoided emissions, and other calculation methods are embodied in CARB's *Benefits Calculator Tool: Organics Programs* and CARB's *Benefits Calculator Tool for the Food Waste Prevention and Rescue Program*.

Sources

- LA County Public Works 2020 Annual Update County of Los Angeles Countywide Organic Waste Management Plan
Link: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=15950&hp=yes&type=PDF>
- California Air Resources Board Benefits Calculator Tool: Organics Programs (California Climate Investments Program)
Link: https://ww2.arb.ca.gov/sites/default/files/auction-proceeds/calrecycle_organics_finalcalc_6-15-20.xlsx
- California Air Resources Board Benefits Calculator Tool for the Food Waste Prevention and Rescue Program (California Climate Investments Program)
Link: https://ww2.arb.ca.gov/sites/default/files/auction-proceeds/calrecycle_finalfoodcalc_19-20.xlsx

Agriculture, Forestry, and Other Land Use

Strategy 9: Conserve Forests and Working Lands

MEASURE A1: CONSERVE AGRICULTURAL AND WORKING LANDS, FOREST LANDS, AND WILDLANDS

Table B-22: Measure A1 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO ₂ E)
2030	8,953
2035	17,906
2045	26,858

Description

Preserve, conserve, and restore agricultural lands, working lands, rangelands, forest lands, wetlands, and other wildlands in the County.

Performance Objectives

The goal of Measure A1 is to reduce annual natural land conversion to urban areas 25 percent below current (2018) levels by 2030, 50 percent by 2035, and 75 percent by 2045; this is equivalent to conserving natural lands that would have otherwise been converted to urban areas by 53 hectares annually by 2030, 106 hectares annually by 2035, and 159 hectares annually by 2045.

Modeling Approach

The Adjusted BAU forecast assumes that 212 hectares of forest land are converted to a new land use each year, which releases carbon stored in the removed biomass. GHG emission reductions from Measure A1 were calculated by decreasing the amount of forest land conversion in each future year and multiplying by an emission factor for land conversion. For each hectare of natural land converted to other uses, a one-time emission of 169 MTCO₂e per hectare would occur (see Appendix A for discussion).⁶² The number of hectares saved from conversion under Measure A1 for each future year was multiplied by the one-time emission rate of 169 MTCO₂e to calculate GHG emission reductions for this measure.

Assumptions

- 212 hectares of natural land is converted annually in the Adjusted BAU forecast.
- For each hectare of natural land saved from conversion, avoided emissions would be 169 MTCO₂e.

References

- NASS, CropScape. 2021
Link: <https://nassgeodata.gmu.edu/CropScape/>

⁶² NASS, CropScape. 2021. Available at: <https://nassgeodata.gmu.edu/CropScape/>. Accessed January 2021.

Strategy 10: Sequester Carbon and Implement Sustainable Agriculture

MEASURE A3: EXPAND THE COUNTY’S TREE CANOPY AND GREEN SPACES

Table B-23: Measure A3 GHG Reductions

YEAR	GHG REDUCTIONS (MTCO2E)
2030	3,540
2035	7,080
2045	14,160

Description

Create an Urban Forest Management Plan which aims to plant trees, increase County tree canopy cover, add green space, and convert impervious surfaces.

Performance Objectives

The goal of Measure A3 is to plant 5,000 new trees by 2030, 10,000 new trees by 2035, and 20,000 new trees by 2045; and to increase County tree canopy cover compared to the 2015 baseline 10 percent by 2030, 15 percent by 2035, and 20 percent by 2045.

Modeling Approach

Measure A3 GHG emission reductions were calculated using assumptions from CalEEMod.⁶³ The calculations assume a carbon sequestration rate per tree planted (from CalEEMod) and an active growing period of 20 years for each tree, after which the tree no longer stores additional carbon. The calculation also assumes a total number of trees planted for each target year, based on the performance objectives above. The number of trees planted each year was then multiplied by the growing period and sequestration rate to estimate the overall GHG reductions from Measure A3 for each target year.

Assumptions

- Tree growing period of 20 years.
- The carbon sequestration rate remains constant for each year for each tree planted.
- The carbon sequestration rate is the average rate for all species classes included in CalEEMod.

References

- CAPCOA, CalEEMod v2020.4.0 User’s Guide, Appendix A Calculation Details
Link: <http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6>

⁶³ CAPCOA, CalEEMod v 2020.4.0 User’s Guide, Appendix A Calculation Details. May 2021. Available at: <http://www.aqmd.gov/docs/default-source/caleemod/user-guide-2021/appendix-a2020-4-0.pdf?sfvrsn=6>. Accessed November 2021.

Short-Lived Climate Pollutants

After carbon dioxide, short-lived climate pollutants such as methane, fluorinated gases, and anthropogenic black carbon are some of humankind's greatest contributions to the global greenhouse effect. The State codified Short-Lived Climate Pollutant Reduction Strategy (SLCP Reduction Strategy) under SB 1383, establishing 2030 goals to reduce methane by 40 percent, HFC gases by 40 percent, and anthropogenic black carbon by 50 percent from 2013 levels.

The SLCP Reduction Strategy outlines efforts to avoid landfill methane emissions by diverting organic waste, recovering methane from landfills, wastewater treatment plants, and dairy farms, and using biogas energy. SB 1383 establishes targets to achieve a 50 percent reduction in the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The strategy further identifies steps to reduce natural gas leaks from oil and gas infrastructure. The 2045 CAP incorporates actions to address methane emissions in Strategy 1, Strategy 5, Strategy 6, Strategy 7, and Strategy 9. All other strategies and measures which reduce fossil fuel combustion have the co-benefit of reducing methane emissions.

The SLCP Reduction Strategy identifies measures that are necessary to reduce HFC emissions from refrigerants, aerosols, foam blowing agents, propellants, and other products. To help meet the HFC reduction target, the state issued HFC prohibitions under SB 1013. The prohibitions are specific to end-use and aim to reduce high-GWP HFCs from residential and retail refrigeration, transportation, construction, and industrial sectors. The 2045 CAP recognizes that national and international actions are necessary to address HFC emissions, including those within the unincorporated County.

The 2015 and 2018 GHG emissions inventories do not include anthropogenic black carbon emissions, as they do not fall under the Kyoto Protocol. The 2045 CAP recognizes the importance of limiting black carbon from residential wood combustion and on-off-road diesel engines. These measures include incentivizing fully electric and net zero energy residences under Strategy 5 and encouraging ZEV adoption under Strategy 4.

B.3 Attachment A: Fehr & Peers Modeling Analysis

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Appendix E

Noise

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Federal Highway Administration Roadway Construction Noise Model (RCNM)

Construction Equipment Reference Noise Levels
From: User's Guide (2006), Table 1.

Table 1. CA/T equipment noise emissions and acoustical usage factors database.

CA/T Noise Emission Reference Levels and Usage Factors					
filename: EQUIPLST.xls					
revised: 7/26/05					
	Impact	Acoustical Use Factor	Spec 721.560 Lmax @ 50ft	Actual Measured Lmax @ 50ft	No. of Actual Data Samples
Equipment Description	Device ?	(%)	(dBA, slow)	(dBA, slow)	(Count)
				(samples averaged)	
All Other Equipment > 5 HP	No	50	85	-- N/A --	0
Auger Drill Rig	No	20	85	84	36
Backhoe	No	40	80	78	372
Bar Bender	No	20	80	-- N/A --	0
Blasting	Yes	-- N/A --	94	-- N/A --	0
Boring Jack Power Unit	No	50	80	83	1
Chain Saw	No	20	85	84	46
Clam Shovel (dropping)	Yes	20	93	87	4
Compactor (ground)	No	20	80	83	57
Compressor (air)	No	40	80	78	18
Concrete Batch Plant	No	15	83	-- N/A --	0
Concrete Mixer Truck	No	40	85	79	40
Concrete Pump Truck	No	20	82	81	30
Concrete Saw	No	20	90	90	55
Crane	No	16	85	81	405
Dozer	No	40	85	82	55
Drill Rig Truck	No	20	84	79	22
Drum Mixer	No	50	80	80	1
Dump Truck	No	40	84	76	31
Excavator	No	40	85	81	170
Flat Bed Truck	No	40	84	74	4
Front End Loader	No	40	80	79	96
Generator	No	50	82	81	19
Generator (<25KVA, VMS signs)	No	50	70	73	74
Gradall	No	40	85	83	70
Grader	No	40	85	-- N/A --	0
Grapple (on backhoe)	No	40	85	87	1
Horizontal Boring Hydr. Jack	No	25	80	82	6
Hydra Break Ram	Yes	10	90	-- N/A --	0
Impact Pile Driver	Yes	20	95	101	11
Jackhammer	Yes	20	85	89	133
Man Lift	No	20	85	75	23
Mounted Impact Hammer (hoe ram)	Yes	20	90	90	212
Pavement Scarafier	No	20	85	90	2
Paver	No	50	85	77	9
Pickup Truck	No	40	55	75	1
Pneumatic Tools	No	50	85	85	90
Pumps	No	50	77	81	17
Refrigerator Unit	No	100	82	73	3
Rivit Buster/chipping gun	Yes	20	85	79	19
Rock Drill	No	20	85	81	3
Roller	No	20	85	80	16
Sand Blasting (Single Nozzle)	No	20	85	96	9
Scraper	No	40	85	84	12
Shears (on backhoe)	No	40	85	96	5
Slurry Plant	No	100	78	78	1
Slurry Trenching Machine	No	50	82	80	75
Soil Mix Drill Rig	No	50	80	-- N/A --	0
Tractor	No	40	84	-- N/A --	0
Vacuum Excavator (Vac-truck)	No	40	85	85	149
Vacuum Street Sweeper	No	10	80	82	19
Ventilation Fan	No	100	85	79	13
Vibrating Hopper	No	50	85	87	1
Vibratory Concrete Mixer	No	20	80	80	1
Vibratory Pile Driver	No	20	95	101	44
Warning Horn	No	5	85	83	12
Welder / Torch	No	40	73	74	5

Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual

Construction Equipment Reference Vibration Levels
From: Transit Noise and Vibration Impact Assessment
Manual (2018), Table 7-4.

Table 7-4 Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 ft, in/sec	Approximate Lv* at 25 ft
Pile Driver (impact)	upper range	1.518	112
	typical	0.644	104
Pile Driver (sonic)	upper range	0.734	105
	typical	0.17	93
Clam shovel drop (slurry wall)		0.202	94
Hydromill (slurry wall)	in soil	0.008	66
	in rock	0.017	75
Vibratory Roller		0.21	94
Hoe Ram		0.089	87
Large bulldozer		0.089	87
Caisson drilling		0.089	87
Loaded trucks		0.076	86
Jackhammer		0.035	79
Small bulldozer		0.003	58

* RMS velocity in decibels, VdB re 1 micro-in/sec

Appendix F

Transportation

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Memorandum

Date: March 29, 2022

To: Brian Schuster, Breanna Sewell, Renee Longman, and Jeff Caton, ESA

From: Ali Kothawala, Seth Contreras, Miguel Nunez, and Sarah Brandenburg, Fehr & Peers

Subject: LA County 2045 Climate Action Plan Update - VMT Technical Memorandum

LA21-3290

Introduction

Purpose of transportation analysis in Climate Action Plan Quantification

The Draft 2045 LA County Climate Action Plan (CAP) actions and targets are informed by a robust data and analysis process. Data was collected for each of the topic areas and analyzed to help inform and develop actions and targets, and create meaningful, measurable, and trackable indicators. Land use and transportation actions that help reduce VMT include bike, ped, and transit improvements, transportation demand management programs, and land use design and density.

This current effort is applying and quantifying estimated benefits of CAP strategies for VMT reductions using a state-of-the-practice approach from the California Air Pollution Control Officers Association (CAPCOA) GHG Handbook

The purpose of this technical memorandum is to present the methodology and assumptions applied for quantifying estimated VMT reductions of selected transportation demand management (TDM) strategies contained in the CAP. The project team developed a list of various TDM strategies as part of the CAP, the strategies were narrowed based on applicability and available data, and the corresponding VMT reductions were estimated using the CAPCOA GHG Reductions Handbook¹ (December 2021).

¹ Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity, California Air Pollution Control Officers Association, December 2021. Last accessed January 3, 2022, at <http://www.airquality.org/air-quality-health/climate-change/ghg-handbook-caleemod>



VMT from Prior CAP Effort

F&P developed an inventory of the VMT and GHG emitted in Los Angeles County in support of the previous Los Angeles County Sustainability Plan (OurCounty). The VMT and emissions analysis for the OurCounty utilized data inputs and outputs from the SCAG regional travel demand model. Emissions were calculated through use of the EMFAC model. The current update to the CAP builds off prior efforts and Buro Happold used the OurCounty VMT projections as the basis for providing forecasts for the year 2045.

VMT Reductions Approach

CAPCOA Overview

TDM strategies have been determined to be among the most effective for reducing VMT. TDM strategies are reductions available from certain types of project site modifications, programming, and operational changes. The effectiveness of identified TDM strategies builds on research documented in the 2010 California Air Pollution Control Officers Association (CAPCOA) publication, *Quantifying Greenhouse Gas Mitigation Measures* (CAPCOA, 2010). The 2010 CAPCOA GHG Handbook was recently updated and the final version was published in December 2021. The CAPCOA Handbook contains detailed equations to apply these TDM reductions given the land use type and built environment context. The Handbook provides a percentage range (minimum-maximum) on the expected VMT reduction for each individual TDM strategy. In addition, some TDM strategies have complementary benefits reducing VMT, and need to be considered in combination, and not individually.

Data Sources (land use, transit, and bike facilities)

In order to apply the appropriate VMT percent reduction for each TDM strategy listed below, certain inputs are required that describe the land use type, built environment context, and characteristics of the TDM strategy. The inputs were provided to Fehr &Peers by LA County staff, and where information was not available, assumptions were made based on the default values provided in the CAPCOA Handbook.

- **Land Use:**
 - Increase residential/job density
 - Provide transit-oriented development (TOD) near high-quality transit areas (HQTA)



- *Data sources:* LA County provided F&P a GIS shapefile layer showing the 2029 Housing Element Rezone Areas. F&P used a major transit stop² GIS layer that was developed as part of the LA County SB 743 VMT Tool released in late 2020.
- **Transit service:**
 - Increase transit service hours
 - Provide treatments to enhance existing transit routes
 - Improve county shuttle system
 - *Data sources :* LA Metro NextGen Plan³ and LA Metro LRTP⁴
- **Bike Facilities:**
 - Increase the number of bikeway miles
 - *Data sources:* Los Angeles County Bike Master Plan 2012.⁵

² "Major transit stop" is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods (CA Public Resource Code, § 21064.3).

³ LA Metro NextGen Bus Plan, Los Angeles Metropolitan Transportation Authority, October 2020. Last accessed on January 03, 2022, at <https://www.metro.net/about/plans/nextgen-bus-plan/>

⁴ 2020 Long Range Transportation Plan, Los Angeles Metropolitan Transportation Authority, Mar 2020. Last accessed on January 03, 2022, at <https://www.metro.net/about/plans/long-range-transportation-plan/>

⁵ Bicycle Master Plan, County of Los Angeles Public Works, March 2012. Last accessed January 3, 2022, at <https://pw.lacounty.gov/tpp/bike/docs/bmp/FINAL%20Bicycle%20Master%20Plan.pdf>



Applying VMT reductions

Data Sources and Quantifying VMT Reductions with CAPCOA

To quantify VMT reductions, appropriate equations were used based on factsheets in the CAPCOA handbook. Using the data obtained from sources identified in the previous section as inputs, percent reductions in VMT were estimated. However, not all reductions can be applied to all or total VMT. VMT resulting from light-duty vehicles is often categorized by trip purpose. Different VMT measures based on their nature and scope of application may apply either to one or more categories of the total combined light-duty vehicle VMT. For example, commuter subsidies are most likely to reduce home-based work VMT for employees and less likely to reduce VMT for retail patrons. In a similar vein, VMT reduction benefits accrue based on the geographic extent and context in which the strategy is applied. For instance, providing bicycle, pedestrian, and transit infrastructure will likely have more benefit in an urban than rural area. Not all measures will have a countywide effect. After identifying data sources, VMT reduction strategies, and the scope of each reduction, the VMT reduction estimates were finalized.

To estimate VMT reductions, implementing actions in the Draft GHG Reduction Measures Recommendations Memo (June 16, 2021) were first screened to identify actions whose reduction can be quantified. While most actions can be quantified, the level of detail needed to provide a detailed VMT estimate was not available; therefore, five quantifiable actions across the three categories were used for the CAP's VMT reduction estimate. This is not to say that the screened-out actions hold little or no GHG reduction potential. Like Supporting or Non-Quantified Reduction Measures enlisted in the Handbook, non-quantified VMT reduction actions although not quantitatively evaluated "may achieve emissions reductions and co-benefits on their own or may enhance the ability of quantified measures to attain expanded reduction and co-benefits." Table 1 summarizes the final list of quantifiable measures and implementing actions under each strategy and corresponding information such as the applicable CAPCOA strategy maximum VMT reduction that can be claimed under the strategy, data inputs required to quantify the benefit, assumptions made where needed, the equation used to estimate VMT reduction, and scope of application for geography and trip purpose.

Table 1. Quantifiable GHG Reduction Measures and corresponding VMT Reduction Category and Scope

Description	Tracking Metrics	Applicable 2021 CAPCOA Strategy & VMT Reduction Range	CAPCOA User Inputs	F&P Input Assumptions	% GHG Reduction Quantification	VMT Category & Geographic Scope to which Reduction is Applied to
Strategy 2: Increase densities and diversity of destinations with an emphasis near transit						
Measure T1: Increase Density Near High-Quality Transit Areas						
Increasing residential density, particularly near transit and affordable housing, is shown to reduce VMT.	Number and percent of increase in DUs in HQTAs, Specific Plans, or Area Plans	T-1 – Increase Residential Density. Up to 30% GHG emissions from VMT, depending on project DU per acre	Project DU per acre & typical DU per acre	Densities range from 20 DU per acre to 50 DU per acre. 9.1 DU/acre for typical density	20 du/acre : $(20-9.1) / 9.1 \times -0.22 =$ <u>-26.4% reduction</u>	Home-Based VMT in TOD Areas
Implementing Actions						
T1.2 – Incentivize and prioritize development	<ul style="list-style-type: none"> • Increase in DUs within HQTA • DU per acre 	T-3 – Provide Transit-Oriented Development	(B) Transit & (D) auto mode share in surrounding City, and (C) Ratio	27% measure maximum (B x C) & 85% auto mode share	27% / -85% = <u>-31.8% reduction (use maximum 31%)</u>	Total VMT in TOD Areas ⁸

⁸ Measure T1 evaluates VMT reductions to home-based residential VMT and implementing action T1.2 evaluates benefits to total VMT.



Description	Tracking Metrics	Applicable 2021 CAPCOA Strategy & VMT Reduction Range	CAPCOA User Inputs	F&P Input Assumptions	% GHG Reduction Quantification	VMT Category & Geographic Scope to which Reduction is Applied to
within (HQTA) ⁶ , while ensuring inclusion of vital public amenities such as parks and active transportation infrastructure.	Change in number of jobs and housing in non- HQTAs	(TOD) ⁷ . Up to 31% of GHG emissions from project VMT.	of transit mode share for TOD area with measure compared to existing transit mode share in surrounding city	based on 2012 CHTS (D)		
Measure T2: Develop Land Use Plans Addressing Jobs/Housing Balance & Increase Mixed Use						
Increasing density and diversity of destinations can help reduce single	Change in number of jobs and housing in non-HQTAs	T-2 – Increase Job Density. Up to 30% GHG emissions from VMT,	Job density of typical development = 145 jobs per acre, & Elasticity of VMT with respect	Project job density = 300 jobs per acre	$(300-145)/145 \times -0.07 =$ <u>-7.5% reduction</u>	This strategy overlaps with the TOD strategy above where we assume 31%

⁶ High Quality Transit Areas: Areas within one half mile of a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

⁷ To be considered TOD, a development must be within a 10-minute walk (0.5 mile) of a high frequency transit station (rail, or bus with headways less than 15 minutes)



Description	Tracking Metrics	Applicable 2021 CAPCOA Strategy & VMT Reduction Range	CAPCOA User Inputs	F&P Input Assumptions	% GHG Reduction Quantification	VMT Category & Geographic Scope to which Reduction is Applied to
occupancy trips, the number of trips, and trip lengths		depending on project jobs per acre	to job density = - 0.07			Total VMT Reduction at TOD sites. No reduction here.
<i>Strategy 3: Reduce single-occupancy vehicle trips</i>						
Measure T3: Expand Bicycle & Pedestrian Network to Serve Residential, Employment, & Recreational Trips						
Travel options that serve a variety of land uses and trip purposes can help shift some trips away from single-occupancy vehicles.		T-17 – Provide Pedestrian Network Improvement. Up to 6.4% GHG emissions from vehicle travel, depending on length of existing and planned facilities	<ul style="list-style-type: none"> • Miles of bikeway type • Miles of transit routes Headways			
Implementing Actions						



Description	Tracking Metrics	Applicable 2021 CAPCOA Strategy & VMT Reduction Range	CAPCOA User Inputs	F&P Input Assumptions	% GHG Reduction Quantification	VMT Category & Geographic Scope to which Reduction is Applied to
<p>T3.2 – Create a more connected and safer bikeway network by expanding bikeway facilities and deploying protected and separated lanes.</p>	<ul style="list-style-type: none"> • Miles of bikeway type • Additional employees or residents served • Number of cities collaborated with to inform key areas for bicycle infrastructure expansion <p>Number of funding sources identified or % of funding secured</p>	<p>T-19 – Expand Bikeway Network. Up to 0.5% GHG emissions from vehicle travel, depending on length of existing and planned facilities</p>	<p>Miles of existing & planned bikeways</p>	<p>LA County Bike Plan proposes a more than fivefold increase in bikeway miles by 2030. The maximum possible reduction of 0.5% is estimated based on the extent of network improvements outlined in the 2012 Bike Plan</p>	<p><u>-0.5%</u> Maximum Reduction</p>	<p>Total VMT Countywide (unincorporated areas)</p>
<p>Measure T4: Encourage Transit, Active Transportation, & Alternative Modes of Transportation</p>						
<p>Implementing Actions</p>						
<p>T4.1 – Expand and improve frequency of existing</p>	<ul style="list-style-type: none"> • Size of area served • Number of employees and residents served 	<p>T-24 – Extend Transit Network Coverage or Hours. Up to 4.6% of GHG emissions from</p>	<p>Total transit service hours before & after expansion</p>	<p>Assume transit mode share of 4.6% per 2012 CHTS; Assume</p>	<p>$-1 \times (1.12M-560K)/560K \times 4.6\% \times 0.7 \times 57.8\% \times 1 =$ <u>-1.9% Reduction</u></p>	<p>Total VMT Countywide (unincorporated areas)</p>



Description	Tracking Metrics	Applicable 2021 CAPCOA Strategy & VMT Reduction Range	CAPCOA User Inputs	F&P Input Assumptions	% GHG Reduction Quantification	VMT Category & Geographic Scope to which Reduction is Applied to
network of County shuttles and explore new mobility services, such as micro transit ⁹ , in unincorporated County areas.	<ul style="list-style-type: none"> • Service frequency and headways 	vehicle travel, depending on increase in transit service hours or miles and the transit mode share in the community.		560,000 existing transit service hours in unincorporated county & 1.12 million after expansion based on Metro NextGen		
T4.2 – Install bus-only lanes and signal prioritization along major thoroughfares, and work with transit	<ul style="list-style-type: none"> • Increase in headways or frequencies • Increase in headways • Increase in residents/employees served 	T-26 – Implement Transit-Supportive Roadway Improvements. Up to 0.6% GHG emissions from vehicle travel, depending on the percent of transit	Percent of transit routes that receive treatments	Assume transit mode share of 4.6% per 2012 CHTS, 85% for auto; Assume 100% of transit routes in	$-1 \times (100\% \times -10 \times -0.4 \times 4.6\% \times 57.8\%) / 85\% =$ <p>-12.5% Reduction (use maximum <u>-0.6%</u>)</p>	Total VMT in TOD Areas/HQTA Stops

⁹ Micro transit is public or private multi-passenger transportation services that serve passengers using dynamically generated routes; they provide transit-like service on a smaller, more flexible scale.



Description	Tracking Metrics	Applicable 2021 CAPCOA Strategy & VMT Reduction Range	CAPCOA User Inputs	F&P Input Assumptions	% GHG Reduction Quantification	VMT Category & Geographic Scope to which Reduction is Applied to
agencies and neighboring jurisdictions to plan and install full bus rapid transit infrastructure along priority corridors, as appropriate.	<ul style="list-style-type: none"> • Travel time reliability • Creation of new HQTAs 	routes that receive improvements.		unincorporated county will receive treatments		

CAPCOA Analysis and Findings

VMT is calculated at the transportation analysis zone (TAZ) level. TAZs are comparable in size and shape to census tracts or block groups depending on the travel demand model used and level of modeling detail. Once the percent VMT reductions were determined, based on the geographic scope and VMT category of each implementation action, the appropriate VMT was aggregated across the county or specific geographic sub areas, such as the TAZs within which transit enhancements would take place. Actions T3.2 and T4.1 were applied countywide. For the remaining actions, only the VMT generated in TAZs whose geographic area overlapped with the location of the infrastructure or land use strategy were included. Percent reductions were then applied to appropriate VMT sub-totals to obtain the VMT reduction estimates. The sum of these reductions was then subtracted from total light-duty vehicle VMT to estimate adjusted daily VMT. This adjusted daily VMT was then projected to obtain VMT reductions and adjusted totals in each analysis year (2030, 2035, and 2045). Table 2 shows reductions for each quantifiable implementation action for the analysis years.

Based on the methodology outlined in the CAPCOA Handbook, when determining the overall VMT reduction, the VMT reduction is separately calculated for each of the individual strategies should be dampened, or diminished, according to a multiplicative formula to account for the fact that some of the strategies may be redundant or applicable to the same populations. The multiplicative equation to accomplish this adjustment is as follows:

$$\text{Overall \% VMT Reduction} = 1 - (1 - A) * (1 - B) * (1 - C) * (1 - D) \dots$$

where A, B, C, D ... = individual mitigation strategy reduction percentages

For example, if two strategies were proposed with corresponding VMT reductions of 20% and 10%, the equation would be $[1 - (1 - 20\%) * (1 - 10\%)]$ or $[1 - (80\% * 90\%)]$, which equates to a 28% reduction rather than the 30% reduction that would otherwise be seen with a direct sum. Therefore, the overall VMT reduction was calculated as a dampened, or diminished, total according to the equation above, which produces a conservative overall estimate.

$$A = 1.38\%; \quad B = 1.97\%; \quad C = 0.15\%; \quad D = 0.57\%; \quad E = 0.01\%$$

$$\text{Overall \% VMT Reduction} = 1 - (1 - 0.0138) * (1 - 0.0197) * (1 - 0.0015) * (1 - 0.0057) * (1 - 0.0001) = 4.03\%$$

Based on the application of VMT reductions and dampening factor, the reduction of 4.03% would result in a total adjusted total daily VMT of 18,649,710 VMT in 2030, for example.

Table 2. VMT Reductions per Quantifiable Implementation Action for Analysis Years 2030, 2035, and 2045

Reduction Category	Reduction Percent	VMT Applied to	Geography Applied to	Daily VMT Reduction			Reduction as a share of Total County VMT
				2030	2035	2045	
M1T1 Increase Residential Density in HQTAs	26.4	Home-based VMT	TAZs intersecting TODs	267,982	269,689	273,103	1.38%
T1.2 Incentivizing and Promoting HQTAs	31	Total VMT	TAZs intersecting TODs	383,838	386,283	391,172	1.97%
T3.2 Pedestrian and Bikeway Network Improvements	0.5	Total VMT	Unincorporated County	28,949	29,133	29,502	0.15%
T4.1 County Shuttles	1.9	Total VMT	Unincorporated County	110,005	110,706	112,107	0.57%
T4.2 Bus-only and signal prioritization	0.6	Total VMT	TAZs intersecting TODs	2,303	2,318	2,347	0.01%
Subtotal for VMT Reductions				793,077	798,128	808,231	
Total Daily VMT (Pre-VMT reductions)				19,442,787	19,596,159	19,902,905	4%
Total Daily VMT (Post-VMT reductions)				18,649,710	18,798,031	19,094,674	

5. Conclusion

The estimated benefits of CAP strategies for VMT reductions were quantified using a state-of-the-practice approach from the California Air Pollution Control Officers Association (CAPCOA) GHG Handbook. GHG reduction measures and Implementing actions were first screened to identify those that can be quantified. Using travel demand forecasting results from the SCAG regional travel demand model, County VMT data were used, based on trip purpose and geography, to estimate benefits from CAP actions.

While several strategies have significant reduction potential of up to 30%, like those that involve increasing residential density, the measures are applied to a portion of the unincorporated county and therefore accrue a net reduction of less than 2% countywide. When accounting for a combined effect, the effectiveness of each measure could be dampened by the existence of a similar overlapping measure. By estimating VMT that more closely reflects the travel to be likely affected by a certain measure, possibilities of overlaps have been minimized. Even then, a dampening factor was applied above to show the total reduction estimate that accounts for dampening arrives at a similar VMT reduction estimate. This analysis will support the analysis and quantification of benefits from the CAP for Los Angeles County and its residents.

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Appendix G

Tribal Cultural Resources

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Andrew Salas, Chairperson
Gabrieleno Band of Mission Indians – Kizh Nation
P.O. Box 393
Covina, CA 91723

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
OURCOUNTY CLIMATE ACTION PLAN
Project No. 2019-002015
General Plan Amendment No. RPPL2019003630
Environmental Plan No. RPPL2019003635**

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Your participation in this local planning process is important. Pursuant to Government Code Section 65352.3(a)(2), you have 90 days from the receipt of this letter to request consultation with the County of Los Angeles. Please submit your request to the contact information listed below.

Lead Agency Contact Information: Christina Tran
Environmental Planning and Sustainability Section
Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012
Telephone: (213) 974-6461
Email: ctran@planning.lacounty.gov

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP

Christina Tran, Senior Regional Planner

Encl: Regional Location Map
Unincorporated Areas of Los Angeles County Map

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



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Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
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November 13, 2019

Anthony Morales, Chairperson
Gabrieleno/Tongva San Gabriel Band of Mission Indians
P.O. Box 693
San Gabriel, CA 91778

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Charles Alvarez
Gabrielino – Tongva Tribe
23454 Vanowen Street
West Hills, CA 91307

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Sincerely,

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Amy J. Bodek, AICP

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Donna Yocum, Chairperson
San Fernando Band of Mission Indians
P.O. Box 221838
Newhall, CA 91322

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Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Fred Collins, Spokesperson
Northern Chumash Tribal Council
P.O. Box 6533
Los Osos, CA 93412

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Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Gino Altamirano, Chairperson
Coastal Band of the Chumash Nation
P.O. Box 4464
Santa Barbara, CA 93140

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General Plan Amendment No. RPPL2019003630
Environmental Plan No. RPPL2019003635**

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Environmental Planning and Sustainability Section
Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012
Telephone: (213) 974-6461
Email: ctran@planning.lacounty.gov

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP

Christina Tran, Senior Regional Planner

Encl: Regional Location Map
Unincorporated Areas of Los Angeles County Map

ACB:CT



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Jairo Avila, Tribal Historic and Cultural Preservation Officer
Fernandeno Tataviam Band of Mission Indians
1019 Second Street, Suite 1
San Fernando, CA 91340

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
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Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Julie Tumamait-Stenslie, Chairperson
Barbareno/Ventureno Band of Mission Indians
365 North Poli Avenue
Ojai, CA 93023

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Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Julio Quair, Chairperson
Chumash Council of Bakersfield
729 Texas Street
Bakersfield, CA 93307

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Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Kenneth Kahn, Chairperson
Santa Ynez Band of Chumash Indians
P.O. Box 517
Santa Ynez, CA 93460

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Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Lee Clauss, Director of Cultural Resources
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

Via U.S. Mail and Email

March 11, 2020

Gino Altamirano, Chairperson
Coastal Band of the Chumash Nation
P.O. Box 4464
Santa Barbara, CA 93140

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
LOS ANGELES COUNTY CLIMATE ACTION PLAN
(PREVIOUSLY “OURCOUNTY CLIMATE ACTION PLAN”)
Project No. 2019-002015
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Dear Gino Altamirano,

Thank you for your email of November 19, 2019, wherein you expressed an interest in a consultation between the Coastal Band of the Chumash Nation (Chumash Nation) and the County of Los Angeles (County) pursuant to SB 18 for the above-referenced project. The County emailed you on November 21, 2019 and on January 8, 2020 to inquire about your availability for a consultation. To date, the County has not heard back from you on this matter. The County had also tried to find the phone number for the Chumash Nation by contacting the Native American Heritage Commission (NAHC) and conducting an internet search. Unfortunately, our due diligence efforts did not produce a contact number, and thus the County was not able to contact the Chumash Nation by phone.

Please be advised that this letter serves as the County’s final attempt to contact the Chumash Nation in order to schedule and proceed with the consultation process. We kindly ask that the Chumash Nation respond to this letter by April 13, 2020. Our contact information is provided below for your convenience. If a response is not provided by the deadline date, the County will conclude the SB 18 process.

SB 18 Consultation

March 11, 2020

Page 2

Thank you in advance for your attention to this matter and we look forward to hearing from you.

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Planning for the Challenges Ahead



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Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
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November 13, 2019

Mark Cochrane, Co-Chairperson
Serrano Nation of Mission Indians
P.O. Box 343
Patton, CA 92369

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Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP

Christina Tran, Senior Regional Planner

Encl: Regional Location Map
Unincorporated Areas of Los Angeles County Map

ACB:CT



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Mark Vigil, Chief
San Luis Obispo County Chumash Council
1030 Ritchie Road
Grover Beach, CA 93433

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
OURCOUNTY CLIMATE ACTION PLAN
Project No. 2019-002015
General Plan Amendment No. RPPL2019003630
Environmental Plan No. RPPL2019003635**

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Director of Regional Planning

Dennis Slavin
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Matias Belardes, Chairperson
Juaneno Band of Mission Indians Acjachemen Nation
32161 Avenida Los Amigos
San Juan Capistrano, CA 92675

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Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Mona Tucker, Chairperson
yak tityu tityu yak tithini-Northern Chumas Tribe
660 Camino Del Rey
Arroyo Grande, CA 93420

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Robert Dorame, Chairperson
Gabrielino Tongva Indians of California Tribal Council
P.O. Box 490
Bellflower, CA 90707

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Dennis Slavin
Chief Deputy Director,
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Robert L. Gomez, Chairperson
Tubatulabals of Kern Valley
P.O. Box 226
Lake Isabella, CA 93240

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Robert Martin, Chairperson
Morongo Band of Mission Indians
12700 Pumarra Road
Banning, CA 92220

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Dennis Slavin
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Robert Robinson, Chairperson
Kern Valley Indian Community
P.O. Box 1010
Lake Isabella, CA 93283

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Lead Agency Contact Information: Christina Tran
Environmental Planning and Sustainability Section
Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012
Telephone: (213) 974-6461
Email: ctran@planning.lacounty.gov

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP

Christina Tran, Senior Regional Planner

Encl: Regional Location Map
Unincorporated Areas of Los Angeles County Map

ACB:CT



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Rudy Ortega, Tribal President
Fernandeno Tataviam Band of Mission Indians
1019 Second Street, Suite 1
San Fernando, CA 91340

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
OURCOUNTY CLIMATE ACTION PLAN
Project No. 2019-002015
General Plan Amendment No. RPPL2019003630
Environmental Plan No. RPPL2019003635**

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Sandonne Goad, Chairperson
Gabrielino/Tongva Nation
106 1/2 Judge John Aiso Street, #231
Los Angeles, CA 90012

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
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Amy J. Bodek, AICP

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Sonia Johnston, Chairperson
Juaneno Band of Mission Indians
P.O. Box 25628
Santa Ana, CA 92799

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Teresa Romero, Chairperson
Juaneno Band of Mission Indians Acjachemen Nation – Romero
31411 La Matanza Street, Suite A
San Juan Capistrano, CA 92675

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Amy J. Bodek, AICP

Christina Tran, Senior Regional Planner

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Wayne Walker, Co-Chairperson
Serrano Nation of Mission Indians
P.O. Box 343
Patton, CA 92369

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
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Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP

Christina Tran, Senior Regional Planner

Encl: Regional Location Map
Unincorporated Areas of Los Angeles County Map

ACB:CT

Fatima Clark

From: Coastal Band of the Chumash Nation <cbcn.consultation@gmail.com>
Sent: Tuesday, November 19, 2019 10:45 PM
To: Christina Tran
Subject: Re: SB 18 Consultation (OurCounty Climate Action Plan project)

CAUTION: External Email. Proceed Responsibly.

Miss Tran. We are interested in consultation. Can we set a time to discuss?

Thank you,
Gino Altamirano

On Thu, Nov 14, 2019 at 3:35 PM Christina Tran <ctran@planning.lacounty.gov> wrote:

Good afternoon,

The signed notification for the above-referenced project was sent to you via U.S. mail on 11/13/19 in conformance with the requirements of SB 18. Attached is an unsigned copy of that notification, which is provided for your information and reference. You should be receiving the signed copy in the mail within the next few days. Please contact me if you have any questions.

Sincerely,

Christina Tran

Senior Planner

Environmental Planning and Sustainability Section
Los Angeles County Department of Regional Planning

[320 W. Temple Street, Room 1362](#)

[Los Angeles, CA 90012](#)
(213) 974-6461

ctran@planning.lacounty.gov

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reproduction of this message or its contents is strictly prohibited. Please notify us immediately by reply email that you have received this message in error, and destroy this message, including any attachments.

Fatima Clark

From: Joyce Perry <kaamalam@gmail.com>
Sent: Thursday, December 12, 2019 10:13 AM
To: Christina Tran
Subject: Re: SB 18 Consultation (OurCounty Climate Action Plan project)

CAUTION: External Email. Proceed Responsibly.

Good Morning Christina,

On behalf of the Juaneno Band of Mission Indians, Acjachemen Nation-Belardes, I am responding to your above notification. After reviewing the contents we have no concerns, thank you.

Húu'uni 'óomaqati yáamaqati.

Teach peace

Joyce Stanfield Perry

Payomkawichum Kaamalam - President

Juaneño Band of Mission Indians, Acjachemen Nation

Tribal Manager, Cultural Resource Director

On Thu, Nov 14, 2019 at 3:33 PM Christina Tran <ctran@planning.lacounty.gov> wrote:

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Environmental Planning and Sustainability Section
Los Angeles County Department of Regional Planning

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Fatima Clark

From: Travis Armstrong <TArmstrong@morongo-nsn.gov>
Sent: Tuesday, December 10, 2019 4:17 PM
To: Christina Tran
Subject: SB 18 - Our County Climate Action Plan Project

CAUTION: External Email. Proceed Responsibly.

Hello,

Regarding the above referenced project, we have no additional comments to provide at this time.

Thank you for reaching out to our office.

Sincerely,

Travis Armstrong
Tribal Historic Preservation Officer
Morongo Band of Mission Indians
951-755-5259
Email: thpo@morongo-nsn.gov



The information contained in this communication is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, or distribution of this information is strictly prohibited and may be unlawful.

For your safety, the contents of this email have been scanned for viruses and malware.

Fatima Clark

From: Jessica Mauck <JMauck@sanmanuel-nsn.gov>
Sent: Thursday, December 12, 2019 3:33 PM
To: Christina Tran
Subject: OurCounty Climate Action Plan Project

Hi Christina,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on 14 November 2019, pursuant to CEQA (as amended, 2015), CA PRC 21080.3.1, and Senate Bill 18. As SMBMI has no concerns with the proposed Project, the Tribe does not elect to consult on this project.

Regards,

Jessica Mauck

CULTURAL RESOURCES ANALYST

O: (909) 864-8933 x3249

M: (909) 725-9054

26569 Community Center Drive Highland California 92346



From: Lee Clauss

Sent: Thursday, November 14, 2019 5:00 PM

To: Jessica Mauck

Subject: FW: SB 18 Consultation (OurCounty Climate Action Plan project)

[FYI...](#)

Lee Clauss

DIRECTOR, CULTURAL RESOURCES MANAGEMENT

O: (909) 864-8933

Internal: 50-3248

M: (909) 633-5851

26569 Community Center Drive Highland California 92346



From: Christina Tran <ctran@planning.lacounty.gov>

Sent: Thursday, November 14, 2019 3:32 PM

To: Lee Clauss <LClauss@sanmanuel-nsn.gov>
Subject: SB 18 Consultation (OurCounty Climate Action Plan project)

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320 W. Temple Street, Room 1362
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ctran@planning.lacounty.gov

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Fatima Clark

From: Susan Arakawa <sarakawa@santaynezchumash.org>
Sent: Friday, December 6, 2019 2:12 PM
To: Christina Tran
Subject: Senate Bill (SB) 18 Consultation Our Country Climate Action Plan
Attachments: Response to Community Climate Action Plan Update LA.docx

CAUTION: External Email. Proceed Responsibly.

Hello Ms. Tran,

Please find attached our response concerning Senate Bill (SB) 18 Consultation Our Country Climate Action Plan.

Thank you for contacting us regarding this matter.

Susan Arakawa
Administrative Assistant | Elders' Council and Culture Department
Santa Ynez Band of Chumash Indians | Tribal Hall
Office: (805) 688-7997 ext. 4119
sarakawa@santaynezchumash.org





Santa Ynez Band of Chumash Indians
Tribal Elders' Council

P.O. Box 517 ♦ Santa Ynez ♦ CA ♦ 93460

Phone: (805)688-7997 ♦ Fax: (805)688-9578 ♦ Email: elders@santaynezchuhmash.org

December 6, 2019

Environmental Planning and Sustainability Section
Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012

Att.: Christina Tran, Senior Regional Planner

Re: Senate Bill (SB) 18 Consultation Our Country Climate Action

Dear Ms. Tran:

Thank you for contacting the Tribal Elders' Council for the Santa Ynez Band of Chumash Indians in regards to the above mentioned project.

At this time, the Elders Council requests no further consultation on this project; however, if supplementary literature reveals additional information, or if the scope of the work changes, we kindly ask to be notified.

If you decide to have the presence of a Native American monitor in place during ground disturbance to assure that any cultural items unearthed be identified as quickly as possible, please contact our office or Chumash of the project area.

Thank you for remembering that at one time our ancestors walked this sacred land.

Sincerely Yours,

The Tribal Elders' Council Governing Board



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

Via U.S. Mail and Email

March 11, 2020

Gino Altamirano, Chairperson
Coastal Band of the Chumash Nation
P.O. Box 4464
Santa Barbara, CA 93140

**RE: SENATE BILL (SB) 18 CONSULTATION (GOVERNMENT CODE §65352.3)
LOS ANGELES COUNTY CLIMATE ACTION PLAN
(PREVIOUSLY "OURCOUNTY CLIMATE ACTION PLAN")
Project No. 2019-002015
General Plan Amendment No. RPPL2019003630
Environmental Plan No. RPPL2019003635**

Dear Gino Altamirano,

Thank you for your email of November 19, 2019, wherein you expressed an interest in a consultation between the Coastal Band of the Chumash Nation (Chumash Nation) and the County of Los Angeles (County) pursuant to SB 18 for the above-referenced project. The County emailed you on November 21, 2019 and on January 8, 2020 to inquire about your availability for a consultation. To date, the County has not heard back from you on this matter. The County had also tried to find the phone number for the Chumash Nation by contacting the Native American Heritage Commission (NAHC) and conducting an internet search. Unfortunately, our due diligence efforts did not produce a contact number, and thus the County was not able to contact the Chumash Nation by phone.

Please be advised that this letter serves as the County's final attempt to contact the Chumash Nation in order to schedule and proceed with the consultation process. We kindly ask that the Chumash Nation respond to this letter by April 13, 2020. Our contact information is provided below for your convenience. If a response is not provided by the deadline date, the County will conclude the SB 18 process.

320 West Temple Street • Los Angeles, CA 90012 • 213-974-6411 • TDD: 213-617-2292

   @LACDRP | planning.lacounty.gov

Thank you in advance for your attention to this matter and we look forward to hearing from you.

Lead Agency Contact Information: Christina Tran
Environmental Planning and Sustainability Section
Department of Regional Planning
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012
Telephone: (213) 974-6461
Email: ctran@planning.lacounty.gov

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP

Alexandra Baldwin FOR
Christina Tran, Senior Regional Planner

ACB:CT



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Andrew Salas, Chairman
Gabrieleno Band of Mission Indians – Kizh Nation
P.O. Box 393
Covina, CA 91723

RE: TRIBAL CULTURAL RESOURCES UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT, AB 52 (GATTO, 2014). FORMAL NOTIFICATION OF THE PROPOSED PROJECT PURSUANT TO PUBLIC RESOURCES CODE (PRC) §21080.3.1

The Los Angeles County Department of Regional Planning is issuing this formal notification of the proposed project. Below please find a description of the proposed project, two maps showing the project location, and our contact information along with the name of our point of contact, pursuant to PRC §21080.3.1(d).

**Proposed Project: OurCounty Climate Action Plan
Project No. 2019-002015
General Plan Amendment No. RPPL2019003630
Environmental Plan No. RPPL2019003635**

Project Description:

The proposed Project, the OurCounty Climate Action Plan (OurCounty CAP), is a comprehensive update to the Los Angeles County Community Climate Action Plan (CCAP) adopted in 2015. The Project entails a General Plan amendment to update the existing CCAP, which is a component of the Air Quality Element of the General Plan. The 2015 CCAP is an action plan that was created to reduce greenhouse gas (GHG) emissions from community activities in the unincorporated Los Angeles County by at least 11% below 2010 levels by 2020. For the update, OurCounty CAP utilizes 2015 data as the baseline year and 2025, 2035, and 2045 as the years for achieving GHG reduction targets. The OurCounty CAP GHG emissions from community activities and the reduction strategies and actions are organized into the following sectors: Stationary Energy; Transportation; Waste; Industrial Processes and Product Use; and Agriculture, Forestry and Other Land Use.

In developing the OurCounty CAP, an updated GHG emissions inventory and forecast was prepared. The GHG inventory provides the baseline from which the County will track GHG emissions reductions within the unincorporated areas of the County. The OurCounty CAP provides GHG reduction targets and includes actions that will help achieve those targets.

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The OurCounty CAP does not propose any change to the existing land use or zoning designations of the County General Plan or Zoning Ordinance, respectively. Furthermore, the OurCounty CAP does not directly involve any new construction/ physical development nor does it grant any entitlements for development. Any future site-specific discretionary project would require a project-level environmental review under the California Environmental Quality Act.

Project Location: Countywide (all unincorporated areas of Los Angeles County)

Lead Agency Contact Information: Christina Tran
Environmental Planning and Sustainability Section
320 W. Temple Street, 13th Floor
Los Angeles, CA 90012
Telephone: (213) 974-6461
Email: ctran@planning.lacounty.gov

AB 52 Formal Notification
November 13, 2019
Page 3

Pursuant to PRC §21080.3.1(b), you have 30 days from the receipt of this letter to request consultation, in writing, with the Department of Regional Planning. Written request must be submitted to the contact information listed above.

Our office hours are Monday through Thursday, 7:00 a.m. to 5:30 p.m. We are closed on Fridays.

Sincerely,
DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP
Director

Christina Tran, Senior Regional Planner
Environmental Planning and Sustainability Section

Encl: Regional Location Map
Unincorporated Areas of Los Angeles County Map

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Anthony Morales, Chief
Gabrieleno Tongva San Gabriel Band of Mission Indians
P.O. Box 693
San Gabriel, CA 91778

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Amy J. Bodek, AICP
Director

Christina Tran, Senior Regional Planner
Environmental Planning and Sustainability Section

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Unincorporated Areas of Los Angeles County Map

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Jairo Avila, Tribal Historic and Cultural Preservation Officer
Fernandeño Tataviam Band of Mission Indians
1019 Second Street
San Fernando, CA 91340

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Amy J. Bodek, AICP
Director

Christina Tran, Senior Regional Planner
Environmental Planning and Sustainability Section

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Unincorporated Areas of Los Angeles County Map

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Lee Clauss
San Manuel Band of Mission Indians
26569 Community Center Drive
Highland, CA 92346

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Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



Amy J. Bodek, AICP
Director of Regional Planning

Dennis Slavin
Chief Deputy Director,
Regional Planning

November 13, 2019

Mr. Octavio Escobedo, Tribal Chair
Tejon Indian Tribe
1761 Hasti Acres Drive, Suite 108
Bakersfield, CA 93309

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