

LOS ANGELES COUNTY 2045 CLIMATE ACTION PLAN

FREQUENTLY ASKED QUESTIONS

Below is a listing of questions and answers regarding the Draft Los Angeles County 2045 Climate Action Plan (2045 CAP). The information provided is based on the most current version of the 2045 CAP (Final Draft-BOS).

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GENERAL FAQs

What is the CAP?

The 2045 CAP is a plan for the County of Los Angeles (County) for meeting greenhouse gas (GHG) emissions reduction targets for unincorporated Los Angeles County by the years 2030, 2035, and 2045. It is an implementation strategy of the General Plan Air Quality Element. It consists of strategies and actions to guide the County to meet these targets. It does not, in and of itself, impose mandates on development projects. It will be monitored, reported on annually, and revisited every five years.

Why are we updating the CAP?

The existing CAP is being updated to implement the Board of Supervisors' climate action directives. Although State law does not mandate that every local jurisdiction develop and maintain a CAP, the County recognizes the value of a qualified CAP to help development projects save time and money, and support sustainable growth in the region. Since the County's previous CAP expired in 2020, the County is not able to provide this support for development projects until the CAP is updated.

What is required by CEQA and what is a qualified CAP?

In accordance with CEQA, projects are required to analyze the project's GHG emissions and make a determination of the significance of impacts (CEQA Guidelines, § 15064.4). A qualified CAP meets CEQA requirements so that future development projects requiring environmental review can streamline the project's GHG impact analyses by demonstrating consistency with the CAP. CEQA GHG streamlining is optional and not required of future development projects.

The 2045 CAP has been developed as a qualified CAP and provides a voluntary streamlining option for the CEQA GHG emissions analysis via the 2045 Climate Action Plan CEQA Streamlining Checklist.

How does the CAP address equity?

The 2045 CAP embraces climate equity guiding principles and commits to reversing discrimination and disinvestment in frontline communities. This will require the County to be intentional in addressing procedural, distributional, and structural equity in the implementation of the 2045 CAP. Vulnerability mapping tools such as the County Climate Vulnerability Assessment, coupled with equity mapping tools, such as the County's Equity Indicators Tool, the State's CalEnviroScreen, and the federal Climate and Economic Justice Screening Tool, will be used to prioritize investments and upgrades.

How were the 2045 CAP strategies, measures, and actions developed?

The 2045 CAP is informed by GHG emissions data; GHG sectors best known practices; the General Plan; other County plans, such as *OurCounty: Los Angeles Countywide Sustainability Plan*; State climate initiatives; and stakeholder input.

In September 2018, the County Board of Supervisors signed the *We Are Still In Declaration*, affirming the County's continued commitment to uphold the target set by the Paris Agreement. Subsequent motions by the Board of Supervisors direct the County to develop and implement plans to address climate change and resiliency in the County. The 2045 CAP works in cooperation with other County efforts, such as the County Water Plan and Bicycle Master Plan. Each of these plans and efforts, which can be found in Appendix C, contribute to and align with the County goals of climate resilience, as directed by the Board of Supervisors.

At the State level, the 2045 CAP aligns with Executive Order B-55-18 and AB 1279, which directs the State of California to achieve net zero GHG emissions no later than 2045, and by requiring the state to reduce direct anthropogenic GHG emissions 85 percent below 1990 levels by 2045. The 2045 CAP also aligns with the California Air Resources Board (CARB) 2022 Scoping Plan for Achieving Carbon Neutrality, which lays out a path for achieving the statewide goals codified in AB 1279.

The 2045 CAP also aligns with dozens of applicable federal and state laws, regulations, and policies that are relevant to GHG emissions reduction and climate resilience. More information can be found in Tables 1-1 and 1-2 of the 2045 CAP.

What are the economic impacts of climate action planning?

The costs of inaction include continued damages and losses from climate-induced disasters. In the last 10 years, damages from floods, droughts, and wildfires in the state of California added up to \$26.9 billion to \$32.9 billion dollars. The economic damage from climate change is astounding at the state level but it is equally significant at the local level. With just one fire alone, the Woolsey Fire cost the region \$3-5 billion in insured losses while the County and taxpayer dollars paid \$52 million in fire suppression. Major insurance companies are starting to exit the California market and no longer offering fire insurance policies to new homeowners or requiring exponentially higher premiums for existing homeowners. This may lead to even greater economic damage from future wildfires as homeowners seek government relief to rebuild.

In addition, the federal government recognizes the need for proactive climate action and has earmarked over \$140 billion dollars in funding for climate action-related projects through the Inflation Reduction Act and the Bipartisan Infrastructure Law. Local jurisdictions with detailed plans for addressing the climate emergency will have a significant advantage when applying for these funding opportunities. The 2045 CAP will demonstrate the County's readiness and make the County competitive for these grants.

PROJECT-LEVEL FAQs

Do development projects need to meet performance objectives in the CAP?

No. The performance objectives in the CAP (identified in Appendix E of 2045 CAP) and the requirements in the 2045 CAP CEQA Streamlining Checklist (Appendix F) are different. The performance objectives in Appendix E are guideposts for the County to meet the overall GHG emission reduction targets, not requirements or mandates for individual development projects.

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Future development projects are subject to the applicability provisions of the General Plan and are required to meet the goals and policies of the General Plan along with adopted regulatory requirements. The 2045 CAP creates a voluntary opportunity for qualifying future development projects to streamline the GHG analysis component of the project's environmental review. Appendix F, 2045 Climate Action Plan CEQA Streamlining Checklist, discusses the opportunity and can be updated administratively as implementation of the 2045 CAP advances to reflect changes that include but are not limited to new ordinances that are adopted.

Appendix E – page E-3

Table E-1 provides implementation details for the measures and actions discussed in Chapter 3. The "Performance Objectives" included in the table embody the specific objectives of the 2045 Los Angeles County Climate Action Plan (2045 CAP) for each measure and action. These performance objectives represent guideposts for the successful implementation of each measure and the 2045 CAP as a whole. However, they are not specific mandates. As the 2045 CAP is implemented and adapted over time, many of these performance objectives may change.

Is the intent of the CAP to restrict housing?

No. The 2045 CAP encourages sustainable housing production at all levels of affordability. Measure T1 (Increase Density Near High-Quality Transit Areas) , Action T1.2 directs the County to develop land use tools that will increase the production of a diversity of housing types, such as missing middle housing. This will be achieved through the implementation of the Housing Element. Outside of the Housing Element, development projects can propose densities higher than what is allowed by the General Plan. However, a General Plan Amendment is needed.

The 2045 CAP also acknowledges that addressing housing affordability remains one of the key issues for housing development in the County and that a contributing barrier to housing production is the entitlement process. The 2045 CAP provides an opportunity for applicants to use the voluntary 2045 CAP CEQA Streamlining Checklist to demonstrate that they have incorporated GHG emissions reduction features and are thus ultimately considered to not have greater impacts than what has already been analyzed by the qualified CAP. By using the Checklist, qualifying housing projects can save time and costs associated with conducting a separate comprehensive GHG analysis. Providing the option to streamline CEQA analysis through the 2045 CAP helps the County meet the Housing Element's goal of sustainable housing production and provides time and cost savings to housing project developers. The 2045 CAP is identified as the Housing Element's Program 3.

Does the CAP require development projects to have 300 jobs/acre?

No. One of the performance objectives for Measure T2 (Develop Land Use Plans Addressing Jobs-Housing Balance and Increase Mixed Use) is achieving a Countywide job density of 300 jobs per acre by 2030. This goal is targeted for specific locations that have high-quality transit mixed with planned high density within the County, such as transit-oriented development areas, and represents an average value for job density across those high-quality transit areas.

A job density of 300 jobs per acre is not a requirement for new development projects and is not a requirement in the 2045 CAP CEQA Streamlining Checklist. Measure T2 is listed as a voluntary Tier 2 item that encourages projects with nonresidential development to “support the County’s goal to achieve a job density of 300 jobs per acre.” A project that does not meet this performance objective could still use the Checklist to streamline its GHG impact analysis under CEQA.

Does the CAP ban natural gas?

No. The CAP includes Measure E1 (Decarbonize Existing Buildings). Measure E1 is not a ban on the use of natural gas, but is a pathway to bring carbon-free options into existing buildings. This will be done through developing and adopting Building Performance Standards and reach code requirements that will guide when and where the transition can appropriately occur. Building Performance Standards establish targets for buildings to reduce energy use or GHG emissions over time, while a reach code is a local building energy code that goes beyond the State’s minimum requirements for energy use or GHG emissions. Measure E1 includes considerations for varying climate, geography, infrastructure, and sole-source dependency challenges that rural communities and unique industries may face. Measure E1 also includes the utilization of alternatives to fossil natural gas to expand opportunities for alternative renewable energy sources. While electricity is currently the most common alternative, other zero-GHG emission fuel sources will be considered for existing buildings.

Measure E2 (Decarbonize New Development), which aims to decarbonize all applicable new development, does not prohibit the use of natural gas. While the goal of Measure E2 is decarbonization, there will be some consideration for varying climate, geography, infrastructure, and sole-source dependency challenges that rural communities and unique industries may face that where decarbonization may be difficult to achieve. These considerations will be identified and further developed during the implementation of Action E2.1, which is an ordinance that requires all applicable new buildings to be zero-GHG emissions and require all new development to be electric-ready. The development of such an ordinance will require research, public outreach, public review of the draft ordinance, and a public hearing.

The 2022 Building Energy Efficiency Standards for Residential and Nonresidential Buildings in the State’s Energy Code (Title 24, Part 6) already has mandatory requirements for electric ready requirements for all newly constructed single-family residences and multifamily buildings when certain natural gas or propane appliances are installed. The State Energy Code already requires that new construction be heat pump space heater ready, electric cooktop ready, and electric clothes dryer ready. While these buildings still provide natural gas connections, it provides the consumer with the choice to use electric appliances by making the building infrastructure available.

Does the CAP require that all water be sourced locally?

No. Measures E5 and E6, which align with State and County efforts, consider a range of water sources, uses, and available technologies to reduce water use and increase water efficiency.

Measure E5 includes a performance objective that 90 percent of total Countywide water demand is met by recycled water, graywater, or potable reuse by the year 2045. These are not project-level mandates, but future benchmarks for water conservation that the 2045 CAP aims to meet through current and future water conservation methods. As part of Measure E5, the 2045 CAP proposes actions to increase local supply sources of water and increase the amount of recycled and graywater used. Currently only 31% of the County's total water is met by locally pumped groundwater according to data from the Los Angeles County Waterworks Districts 2020 Urban Water Management Plan. Out of all the water used, 59% of it is collected as wastewater and goes through secondary treatment. The 2045 CAP proposes actions that support water conservation as well as smart approaches to capture and reuse of water.

Measure E6 calls for the reduction in indoor and outdoor water consumption and includes a performance objective that total water use be reduced from the current of 121 gallons per capita per day (GPCD) to less than 85 GPCD by 2045. The Measure includes Action E6.1 that the County develop a water conservation ordinance for new development and suggests that a future ordinance may include a net zero water requirement for new greenfield development. This builds upon the *OurCounty Sustainability Plan* Action 32 and Action 114, which call for development of a Net Zero Water Ordinance for new development.

Are projects required to use Offsite GHG Credits?

No. Action ES5.3 directs the County to develop an Offsite GHG Reduction Program as a mitigation pathway for projects that voluntarily elect to use the 2045 CAP CEQA Streamlining Checklist ("Checklist"). This program will be available for project applicants to use as an alternative GHG reduction measure to the Checklist requirements. Applicants may fund or implement local offsite GHG mitigation projects that reduce GHG emissions within unincorporated Los Angeles County.

The Offsite GHG Reduction Program will be used in tandem with the Checklist. If a project cannot implement all feasible on-site GHG reduction measures in the Checklist, then the Offsite GHG Reduction Program would allow the project to propose local, offsite GHG reduction measures as alternatives to meet the mitigation requirement.

Projects may utilize GHG offset credits outside of the unincorporated Los Angeles County to mitigate their GHG impacts pursuant to CEQA requirements and CARB's 2022 Scoping Plan when conducting their own project GHG analysis and not using the Checklist.

IMPLEMENTATION FAQs:

How will the CAP be implemented?

Once the 2045 CAP is adopted by the Board of Supervisors, lead departments will follow the CAP Implementation Process. The [County] CAP Implementation Team will use the information provided in the CAP, such as the action description, performance objective numbers, metrics, and timeframe.



Figure 4-1: CAP Implementation Process

See Chapter 4 of the 2045 CAP (Final Draft) for a more detailed explanation of each step of the CAP Implementation Process.

What is the 2045 CAP CEQA Streamlining Checklist?

Since the 2045 CAP was developed as a “qualified CAP,” the 2045 CAP CEQA Streamlining Checklist (Checklist) provides development projects the ability to **voluntarily (elect to)** use the Checklist to streamline environmental review of project GHG impacts. The Applicants may use the Checklist to show that the project addresses the 2045 CAP GHG emissions reductions goals in lieu of preparing a separate project-level GHG analysis.

Are development projects required to use the Checklist?

No. The Checklist is voluntary and streamlining environmental review is provided as an incentive for projects to meet the emissions reduction goals of the 2045 CAP. Projects are still able to conduct their own project GHG analysis.

Not all projects can use the Checklist. Projects must be consistent with the General Plan Land Use Policy Map. If the project needs a General Plan Amendment to be consistent with the General Plan Land Use Policy Map, then the project is not eligible to utilize the Checklist. Furthermore, ministerial projects and projects that otherwise are exempt from CEQA are deemed to be consistent with the 2045 CAP, with some exceptions, and no further review is necessary.

How can a development project streamline the CEQA GHG analysis using the CAP?

After the CAP is adopted, development projects that are subject to CEQA can opt to use the Checklist or develop their own GHG analysis. Development projects will typically follow this process:

- 1. Land use application.** Submit land use application and required application materials.
- 2. Environmental review.** An Initial Study will be required if the project requires a discretionary permit and is unable to use a CEQA exemption.
- 3. GHG Emissions Analysis.** CEQA requires an analysis to calculate or estimate the amount of GHG emissions resulting from the project. The applicant can choose one of the options below.

2045 CAP CEQA Checklist

Complete (if eligible) the Checklist to show compliance with applicable CEQA streamlining requirements. Projects must include all Tier 1 measures in the Checklist and are strongly encouraged to also show consistency with the Tier 2 measures, although they are not required (encouraged for streamlining). The Checklist requirements are project-level actions and not the same as the 2045 CAP performance goals.

If the Tier 1 measures cannot be met, the applicant may submit an alternative emission reduction measure. The applicant must provide evidence that the alternative measure provides equivalent emissions reductions to be consistent with the Checklist.

Separate project-level GHG emissions analysis

Conduct a project-level GHG emissions analysis consistent with CEQA Guidelines section 15064.4. The analysis should also provide mitigation measures to reduce or mitigate the project's incremental contribution of greenhouse gas emissions.