

5. Environmental Analysis

5.7 GREENHOUSE GAS EMISSIONS

This section of the EIR evaluates the potential for implementation of the SUP to cumulatively contribute to greenhouse gas (GHG) emission impacts in the District. Because individually no one project is large enough to single-handedly result in a significant increase in global concentrations of GHG emissions, project-related climate change impacts are inherently cumulative. The section discusses plans and policies from several jurisdictional agencies and LAUSD standard conditions, guidelines, specifications, practices, policies, and project design features (LAUSD Standards), along with the existing GHG emissions throughout the SUP area, and possible environmental impacts that may occur during future phases of the SUP and site-specific projects implemented under the SUP.

TERMINOLOGY

The following are definitions for terms used throughout this section.

Greenhouse gases (GHG). Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.

Global warming potential (GWP). Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide (CO₂) over a given period of time (20, 100, and 500 years). CO₂ has a GWP of 1.

Carbon dioxide-equivalent (CO₂e). The standard unit to measure the amount of greenhouse gases in terms of the amount of CO₂ that would cause the same amount of warming. CO₂e is based on the GWP ratios between the various GHGs relative to CO₂.

MTCO₂e. Metric ton of CO₂e.

MMTCO₂e. Million metric tons of CO₂e.

Greenhouse Gases and Climate Change

Climate change is the variation of earth's climate over time, whether due to natural variability or as a result of human activities. Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as GHG, to the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHG—water vapor,¹ CO₂, methane (CH₄), and ozone (O₃)—that are the likely causes of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O) and fluorinated gases.^{2,3} The major GHGs are briefly described below.

¹ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant.

² Intergovernmental Panel on Climate Change (IPCC). 2001. "2001 IPCC Third Assessment Report: Climate Change 2001."

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Carbon dioxide (CO₂) enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.

Methane (CH₄) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in municipal landfills and water treatment facilities.

Nitrous oxide (N₂O) is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.

Fluorinated gases are synthetic, strong GHGs that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for ozone-depleting substances. These gases are typically emitted in smaller quantities, but they are potent GHGs, sometimes referred to as high GWP gases.

- **Sulfur Hexafluoride (SF₆)** is a colorless gas soluble in alcohol and ether, slightly soluble in water. SF₆ is a strong GHG used primarily in electrical transmission and distribution systems as an insulator.
- **Hydrofluorocarbons (HFCs)** contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone-depleting substances to serve many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing. They do not significantly deplete the stratospheric ozone layer, but they are strong GHGs.⁴
- **Hydrochlorofluorocarbons (HCFCs)** contain hydrogen, fluorine, chlorine, and carbon atoms. Although ozone-depleting substances, they are less potent at destroying stratospheric ozone than CFCs. They have been introduced as temporary replacements for CFCs and are GHGs.
- **Perfluorocarbons (PFCs)** are a group of human-made chemicals composed of carbon and fluorine only. These chemicals (predominantly perfluoromethane [CF₄] and perfluoroethane [C₂F₆]) were introduced as alternatives, along with HFCs, to the ozone-depleting substances. In addition, PFCs are emitted as by-products of industrial processes and are also used in manufacturing. PFCs do not harm the stratospheric ozone layer, but they have a high global warming potential.
- **Chlorofluorocarbons (CFCs)** are GHGs covered under the 1987 Montreal Protocol and used for refrigeration, air conditioning, packaging, insulation, solvents, or aerosol propellants. Since they are not destroyed in the lower atmosphere (troposphere, stratosphere), CFCs drift into the upper atmosphere

³ Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (California Air Resources Board. 2014, February 10. Proposed First Update to the Climate Change Scoping: Building on the Framework. http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf).

⁴<http://www.epa.gov/climatechange/ghgemissions/gases.html>.

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where, given suitable conditions, they break down ozone. These gases are therefore being replaced by other GHG compounds covered under the Kyoto Protocol.

Table 5.7-1 lists the GHG applicable to the SUP and its relative global warming potential (GWP).

Table 5.7-1 GHG and Their Relative Global Warming Potential Compared to CO₂

GHG	Atmospheric Lifetime (years)	Global Warming Potential Relative to CO ₂ ^a
Carbon Dioxide (CO ₂)	50 to 200	1
Methane (CH ₄) ^b	12 (±3)	21
Nitrous Oxide (N ₂ O)	120	310
Hydrofluorocarbons:		
HFC-23	264	11,700
HFC-32	5.6	650
HFC-125	32.6	2,800
HFC-134a	14.6	1,300
HFC-143a	48.3	3,800
HFC-152a	1.5	140
HFC-227ea	36.5	2,900
HFC-236fa	209	6,300
HFC-4310mee	17.1	1,300
Perfluoromethane: CF ₄	50,000	6,500
Perfluoroethane: C ₂ F ₆	10,000	9,200
Perfluorobutane: C ₄ F ₁₀	2,600	7,000
Perfluoro-2-methylpentane: C ₆ F ₁₄	3,200	7,400
Sulfur Hexafluoride (SF ₆)	3,200	23,900

Source: Intergovernmental Panel on Climate Change (IPCC). 2001. 2001 IPCC Third Assessment Report: Climate Change 2001; U.S. Environmental Protection Agency (USEPA), 2012. Greenhouse Gas Emissions.

^a Based on 100-Year Time Horizon of the Global Warming Potential (GWP) of the air pollutant relative to CO₂.

^b The methane GWP includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.

5.7.1 Environmental Setting

5.7.1.1 REGULATORY FRAMEWORK

National, and State laws, regulations, plans, and guidelines are summarized below. The following regulatory framework discussion does not include all plans and policies that relate to GHG in the District. Site-specific projects have not been identified, and there may be local jurisdictional plans and policies that are applicable depending on the project site. Specific requirements of these laws, regulations, plans, and guidelines might not be up to date when a proposed site-specific school project undergoes review. Therefore, this section provides a general discussion of the most important of these matters that apply to SUP projects. Some of these are not directly applicable to the SUP or site-specific projects implemented under the SUP; however, they are included to assist in identifying potential impacts and significance thresholds. Applicable LAUSD

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Standards are also listed. See *Applicable Regulations and Standard Conditions* at end of this chapter for those that require District compliance.

Federal

The United States Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emission from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings do not in and of themselves impose any emission reduction requirements, but allow the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation.⁵

The EPA's endangerment finding covers emissions of six key GHGs—CO₂, CH₄, N₂O, hydrofluorocarbons, perfluorocarbons, and SF₆—which have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world.

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 MTCO_{2e} or more per year are required to submit an annual report.

State

Executive Order S-03-05

Executive Order S-3-05, signed June 1, 2005, set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

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

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in AB 32, the Global Warming Solutions Act. AB 32 was passed by the California state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in Executive Order S-3-05.

AB 32 directed the California Air Resources Board (CARB) to adopt discrete early action measures to reduce GHG emissions and outline additional reduction measures to meet the 2020 target. Based on the GHG emissions inventory conducted for the Scoping Plan by CARB, GHG emissions in California by 2020 are anticipated to be approximately 596 MMTCO_{2e}. In December 2007, CARB approved a 2020 emissions limit of 427 MMTCO_{2e} (471 million tons) for the state. The 2020 target requires a total emissions reduction of

⁵ U.S. Environmental Protection Agency (USEPA). 2009, December. EPA: Greenhouse Gases Threaten Public Health and the Environment. Science overwhelmingly shows greenhouse gas concentrations at unprecedented levels due to human activity. <http://yosemite.epa.gov/opa/admpress.nsf/0/08D11A451131BCA585257685005BF252>.

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169 MMTCO_{2e}, 28.5 percent from the projected emissions of the business-as-usual (BAU) scenario for the year 2020 (i.e., 28.5 percent of 596 MMTCO_{2e}).^{6,7}

In order to effectively implement the emissions cap, AB 32 directed CARB to establish a mandatory reporting system to track and monitor GHG emissions levels for large stationary sources that generate more than 25,000 MT of CO_{2e} per year, prepare a plan demonstrating how the 2020 deadline can be met, and develop appropriate regulations and programs to implement the plan by 2012. The Climate Action Registry Reporting Online Tool was established through the Climate Action Registry to track GHG emissions.

CARB 2008 Scoping Plan

The final Scoping Plan was adopted by CARB on December 11, 2008. Key elements of CARB's GHG reduction plan that may be applicable to the SUP include:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards (adopted and cycle updates in progress).
- Achieving a mix of 33 percent for energy generation from renewable sources (anticipated by 2020).
- A California cap-and-trade program that links with other Western Climate Initiative (WCI) partner programs to create a regional market system for large stationary sources (adopted 2011).
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets (several Sustainable Communities Strategies have been adopted).
- Adopting and implementing measures pursuant to state laws and policies, including California's clean car standards (amendments to the Pavley Standards adopted 2009; Advanced Clean Car standard adopted 2012), goods movement measures, and the Low Carbon Fuel Standard (LCFS) (adopted 2009).⁸
- Creating target fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the state's long-term commitment to AB 32 implementation (in progress).

⁶ California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.

⁷ CARB defines BAU in its Scoping Plan as emissions levels that would occur if California continued to grow and add new GHG emissions but did not adopt any measures to reduce emissions. Projections for each emission-generating sector were compiled and used to estimate emissions for 2020 based on 2002–2004 emissions intensities. Under CARB's definition of BAU, new growth is assumed to have the same carbon intensities as was typical from 2002 through 2004.

⁸ On December 29, 2011, the U.S. District Court for the Eastern District of California issued several rulings in the federal lawsuits challenging the LCFS. One of the court's rulings preliminarily enjoins the CARB from enforcing the regulation during the pendency of the litigation. In January 2012, CARB appealed the decision and on April 23, 2012, the Ninth Circuit Court granted CARB's motion for a stay of the injunction while it continues to consider CARB's appeal of the lower court's decision. On July 15, 2013, the State of California Court of Appeals held that the LCFS would remain in effect and that CARB can continue to implement and enforce the 2013 regulatory standards while it corrects certain aspects of the procedures by which the LCFS was adopted. Accordingly, CARB is continuing to implement and enforce the LCFS while addressing the court's concerns.

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Table 5.7-2 shows the proposed reductions from regulations and programs outlined in the Scoping Plan. While local government operations were not accounted for in achieving the 2020 emissions reduction, CARB estimates that land use changes implemented by local governments that integrate jobs, housing, and services result in a reduction of 5 MMTCO_{2e}, which is approximately 3 percent of the 2020 GHG emissions reduction goal. In recognition of the critical role local governments play in the successful implementation of AB 32, CARB is recommending GHG reduction goals of 15 percent of today's levels by 2020 to ensure that municipal and community-wide emissions match the state's reduction target.⁹ Measures that local governments take to support shifts in land use patterns are anticipated to emphasize compact, low-impact growth over development in greenfields, resulting in fewer vehicle miles travelled (VMT).¹⁰

2008 Scoping Plan Update

Since release of the 2008 Scoping Plan, CARB has updated the statewide GHG emissions inventory to reflect GHG emissions in light of the economic downturn and of measures not considered in the 2008 Scoping Plan baseline inventory. The updated forecast predicts emissions to be 507 MMTCO_{2e} by 2020. The new inventory identifies that an estimated 80 MMTCO_{2e} of reductions are necessary to achieve the statewide emissions reduction of AB 32 by 2020, 15.7 percent of the projected emissions compared to BAU in year 2020 (i.e., 15.7 percent of 507 MMTCO_{2e}).¹¹

CARB is in the process of completing a five-year update to the 2008 Scoping Plan, as required by AB 32. It released the draft of the proposed 2013 Scoping Plan on February 10, 2014. The 2013 Scoping Plan update defines CARB's climate change priorities for the next five years and lays the groundwork to reach post-2020 goals in Executive Orders S-3-05 and B-16-2012. The update includes the latest scientific findings related to climate change and its impacts, including short-lived climate pollutants. The GHG target identified in the 2008 Scoping Plan is based on IPCC's GWP identified in the Second and Third Assessment Reports. IPCC's Fourth Assessment Report identified more recent GWP values based on the latest available science. As a result, CARB recalculated the 1990 GHG emission levels with these updated GWPs. Using the new GWPs, the 427 MMTCO_{2e} 1990 emissions level and 2020 GHG emissions limit, established in response to AB 32, would be slightly higher at 431 MMTCO_{2e}.¹²

The 2013 update highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals defined in the original 2008 Scoping Plan. As identified in the 2013 Scoping Plan update, California is on track to meeting the goals of AB 32. However, the 2013 Scoping Plan also addresses the state's longer-term GHG goals in a post-2020 element. The post-2020 element provides an overview of a long-term strategy for meeting the 2050 GHG goals, including a recommendation for the state to adopt a midterm target. According to the 2013 Scoping Plan, reducing emissions to 80 percent below 1990 levels will

⁹ Although the Scoping Plan references a goal for local governments to reduce community GHG emissions by 15 percent from current (interpreted as 2008) levels by 2020, it does not rely on local GHG reduction targets established by local governments to meet the state's GHG reduction target of AB 32. Table 5.6-3 lists the recommended reduction measures, which do not include additional reductions from local measures.

¹⁰ California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.

¹¹ California Air Resources Board. 2012. Status of Scoping Plan Recommended Measures. http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf.

¹² California Air Resources Board (CARB). 2014, February 10. Proposed First Update to the Climate Change Scoping: Building on the Framework. http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf.

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require a fundamental shift to efficient, clean energy in every sector of the economy. Progressing toward California's 2050 climate targets will require significant acceleration of GHG reduction rates. Emissions from 2020 to 2050 will have to decline several times faster than the rate needed to reach the 2020 emissions limit.¹³

Table 5.7-2 Scoping Plan GHG Reduction Measures and 2020 State Target

Recommended Reduction Measures	Reductions Counted toward 2020 Target of 169 MMTCO _{2e}	Percentage of Statewide 2020 Target
Cap and Trade Program and Associated Measures		
California Light-Duty Vehicle GHG Standards	31.7	19%
Energy Efficiency	26.3	16%
Renewable Portfolio Standard (33 percent by 2020)	21.3	13%
Low Carbon Fuel Standard	15	9%
Regional Transportation-Related GHG Targets ^a	5	3%
Vehicle Efficiency Measures	4.5	3%
Goods Movement	3.7	2%
Million Solar Roofs	2.1	1%
Medium/Heavy Duty Vehicles	1.4	1%
High Speed Rail	1.0	1%
Industrial Measures	0.3	0%
Additional Reduction Necessary to Achieve Cap	34.4	20%
Total Cap and Trade Program Reductions	146.7	87%
Uncapped Sources/Sectors Measures		
High Global Warming Potential Gas Measures	20.2	12%
Sustainable Forests	5	3%
Industrial Measures (for sources not covered under cap and trade program)	1.1	1%
Recycling and Waste (landfill methane capture)	1	1%
Total Uncapped Sources/Sectors Reductions	27.3	16%
Total Reductions Counted toward 2020 Target	174	100%
Other Recommended Measures – Not Counted toward 2020 Target		
State Government Operations	1.0 to 2.0	1%
Local Government Operations ^b	To Be Determined	NA
Green Buildings	26	15%
Recycling and Waste	9	5%
Water Sector Measures	4.8	3%
Methane Capture at Large Dairies	1	1%
Total Other Recommended Measures – Not Counted toward 2020 Target	42.8	NA

Source: California Air Resources Board, 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.

Notes: The percentages in the right-hand column add up to more than 100 percent because the emissions reduction goal is 169 MMTCO_{2e} and the Scoping Plan identifies 174 MMTCO_{2e} of emissions reductions strategies.

MMTCO_{2e}: million metric tons of CO_{2e}

^a Reductions represent an estimate of what may be achieved from local land use changes. It is not the SB 375 regional target.

^b According to the Measure Documentation Supplement to the Scoping Plan, local government actions and targets are anticipated to reduce vehicle miles by approximately 2 percent through land use planning, resulting in a potential GHG reduction of 2 million metric tons of CO_{2e} (or approximately 1.2 percent of the GHG reduction target). However, these reductions were not included in the Scoping Plan reductions to achieve the 2020 target.

¹³ California Air Resources Board (CARB). 2014, February 10. Proposed First Update to the Climate Change Scoping: Building on the Framework. http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf.

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Senate Bill 375

In 2008, SB 375 was adopted to achieve the GHG reduction targets in the Scoping Plan for the transportation sector through local land use decisions that affect travel behavior. Implementation is intended to reduce VMT and GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations with local land use planning. Specifically, SB 375 requires CARB to establish GHG emissions reduction targets for each of the 17 regions in California managed by a metropolitan planning organization (MPO). Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target. The Southern California Association of Governments (SCAG) is the MPO for the southern California region, which includes the counties of Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. SCAG's targets are an 8 percent per capita reduction from 2005 GHG emission levels by 2020 and a 13 percent per capita reduction from 2005 GHG emission levels by 2035.

The 2020 targets are smaller than the 2035 targets because a significant portion of the built environment in 2020 has been defined by decisions that have already been made. In general, the 2020 scenarios reflect that more time is needed for large land use and transportation infrastructure changes. Most of the reductions in the interim are anticipated to come from improving the efficiency of the region's existing transportation network. The targets would result in 3 MMTCO_{2e} of GHG reductions by 2020 and 15 MMTCO_{2e} of GHG reductions by 2035. Based on these reductions, the passenger vehicle target in CARB's Scoping Plan (for AB 32) would be met.¹⁴

SB 375 requires the MPOs to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plan. For the SCAG region, the SCS was adopted April 2012 (SCAG 2012). The SCS establishes a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement). The SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers.

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles.

¹⁴ California Air Resources Board. 2010, August. Staff Report Proposed Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.

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Executive Order S-01-07

On January 18, 2007, the state set a new LCFS for transportation fuels sold within the state. Executive Order S-1-07 sets a declining standard for GHG emissions measured in CO_{2e} grams per unit of fuel energy sold in California. The LCFS requires a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The LCFS applies to refiners, blenders, producers, and importers of transportation fuels and would use market-based mechanisms to allow these providers to choose how they reduce emissions during the fuel cycle using the most economically feasible methods.

Senate Bills 1078 and 107 and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewable portfolio standard (RPS) established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. Executive Order S-14-08 was signed in November 2008, which expands the state's renewable energy standard to 33 percent renewable power by 2020. In 2011, the state legislature adopted this higher standard in Senate Bill X1-2. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production will decrease indirect GHG emissions from development projects, because electricity production from renewable sources is generally considered carbon neutral.

Executive Order B-16-2012

On March 23, 2012, the state directed CARB, the California Energy Commission, California Public Utilities Commission, and other relevant agencies to work with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate zero-emissions vehicles in major metropolitan areas, including infrastructure to support zero-emissions vehicles (e.g., electric vehicle charging stations). The executive order also directed that the number of zero-emission vehicles in California's state vehicle fleet increase through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are zero emission by 2015 and at least 25 percent of fleet purchases of light-duty vehicles are zero emission by 2020. The executive order also establishes a target for reducing GHG emissions from the transportation sector of 80 percent below 1990 levels.

California Code of Regulations, Title 24, Part 6

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission in June 1977 and are updated tri-annually in the **California Building Code**. Title 24, Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On May 31, 2012, the California Energy Commission adopted the 2013 Building Energy Efficiency Standards, which went into effect on January 1, 2014. Buildings that are constructed in accordance with the

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2013 Building and Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

California Code of Regulations, Title 24, Part 11

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (CALGreen) was adopted as part of the California Building Standards Code (Part 11, Title 24, California Code of Regulations). CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.¹⁵ The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011.

California Code of Regulations, Title 20, Sections 1601 through 1608

The 2006 **Appliance Efficiency Regulations** were adopted by the California Energy Commission on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non-federally regulated appliances.

LAUSD Standards

This table lists the GHG related standard conditions and project design features that are included as part of each SUP-related project, as appropriate.

PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
Standard Conditions				
USS-0 Compliance	Construction waste management	When projects will generate construction and demolition debris	Prior to start of and during construction	<p>School Design Guide. Construction and demolition waste shall be recycled to the maximum extent feasible. LAUSD has established a minimum non-hazardous construction and demolition debris recycling requirement of 75% by weight as defined in Specification 01340, Construction & Demolition Waste Management. (School Design Guide, January 2014)</p> <p>Specification 01340, Construction & Demolition Waste Management. Specification 01340, Construction & Demolition Waste Management includes procedures for preparation and implementation, including reporting and documentation, of a Waste Management Plan for reusing, recycling, salvage or disposal of non-hazardous waste materials generated during demolition and/or new construction (Construction & Demolition (C&D) Waste), to foster material recovery and re-use and to minimize disposal in landfills. Requires the</p>

¹⁵ The green building standards became mandatory in the 2010 edition of the code.

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PDF #	Topic	Trigger for Compliance	Implementation Phase	Standard Conditions and Project Design Features
				collection and separation of all C&D waste materials generated on-site, reuse or recycling on-site, transportation to approved recyclers or reuse organizations, or transportation to legally designated landfills, for the purpose of recycling salvaging and/or reusing a minimum of 75% of the C&D waste generated. (Specification 01340, Construction & Demolition Waste Management, July 7, 2003)
Project Design Features				
GHG-1	Water use and efficiency	If project include work on water pumps, valves, piping, and/or tanks.	During school operation	During school operation, LAUSD shall perform regular preventative maintenance on pumps, valves, piping, and tanks to minimize water loss.
GHG-2	Water use and efficiency	If projects involve work on landscape irrigation system.	Prior to full operation of irrigation system	LAUSD shall utilize automatic sprinklers set to irrigate landscaping during the morning and evening hours to reduce water loss from evaporation.
GHG-3	Water use and efficiency	If projects involve work on landscape irrigation system.	Prior to full operation of irrigation system	LAUSD shall reset automatic sprinkler timers to water less during cooler months and during the rainy season.
GHG-4	Water use and efficiency	If projects involve work on landscape and/or irrigation system.	Prior to full operation of irrigation system	LAUSD shall develop a water budget for landscape (both non-recreational and recreational) and ornamental water use to conform to the local water efficient landscape ordinance. If no local ordinance is applicable, then use the landscape and ornamental budget outlined by the California Department of Water Resources.
GHG-5	Energy efficiency	If project involves a building construction	Prior to occupancy	LAUSD shall ensure that the time dependent valued energy of the proposed project design is at least 10 percent, with a goal of 20 percent less than a standard design that is in minimum compliance with the California Title 24, Part 6 energy efficiency standards that are in force at the time the project is submitted to the Division of the State Architect.

5.7.1.2 EXISTING CONDITIONS

California's GHG Sources and Relative Contribution

California is the second largest emitter of GHG in the United States, only surpassed by Texas, and the tenth largest GHG emitter in the world. However, California also has over 12 million more people than the state of Texas. Because of more stringent air emission regulations, in 2001 California ranked fourth lowest in carbon

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emissions per capita and fifth lowest among states in CO₂ emissions from fossil fuel consumption per unit of Gross State Product (total economic output of goods and services).¹⁶

CARB's latest update to the statewide GHG emissions inventory was conducted in 2012 for year 2009 emissions.¹⁷ In 2009, California produced 457 MMTCO₂e GHG emissions.¹⁸ California's transportation sector is the single largest generator of GHG emissions, producing 37.9 percent of the state's total emissions. Electricity consumption is the second largest source, comprising 22.7 percent. Industrial activities are California's third largest source of GHG emissions, comprising 17.8 percent of the state's total emissions. Other major sources of GHG emissions include commercial and residential, recycling and waste, high global warming potential GHGs, agriculture, and forestry.¹⁹

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHG in the atmosphere remained relatively constant. During the 20th century, however, scientists observed a rapid change in the climate and climate change pollutants that are attributable to human activities. The amount of CO₂ has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million (ppm) per year since 1960, mainly due to combustion of fossil fuels and deforestation (IPCC 2007). These recent changes in climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants.²⁰

Climate change scenarios are affected by varying degrees of uncertainty. IPCC's 2007 Fourth Assessment Report projects that the global mean temperature increase from 1990 to 2100, under different climate-change scenarios, will range from 1.4 to 5.8°C (2.5 to 10.4°F). In the past, gradual changes in the earth's temperature changed the distribution of species, availability of water, etc. However, human activities are accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic timeframe but within a human lifetime.²¹

Potential Climate Change Impacts for California

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are also hard to predict. In

¹⁶ California Energy Commission. 2006, December. Inventory of California Greenhouse Gas Emissions and Sinks 1990 to 2004. Report CEC-600-2006-013-SF.

¹⁷ Methodology for determining the statewide GHG inventory is not the same as the methodology used to determine statewide GHG emissions under Assembly Bill 32 (AB 32).

¹⁸ CO₂-equivalence is used to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. The global warming potential of a GHG is also dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

¹⁹ California Air Resources Board. 2012, April. California Greenhouse Gas Inventory for 2000–2009. By Category as Defined by the Scoping Plan.

²⁰ California Climate Action Team (CAT). 2006, March. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

²¹ California Climate Action Team (CAT). 2006, March. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

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California and western North America, observations of the climate have shown: 1) a trend toward warmer winter and spring temperatures, 2) a smaller fraction of precipitation is falling as snow, 3) a decrease in the amount of spring snow accumulation in the lower and middle elevation mountain zones, 4) an advance snowmelt of 5 to 30 days earlier in spring, and 5) a similar shift (5 to 30 days earlier) in the timing of spring flower blooms.²² According to the California Climate Action Team (CAT), even if actions could be taken to immediately curtail climate change emissions, the potency of emissions that have already built up, their long atmospheric lifetimes (see Table 5.7-1), and the inertia of the Earth's climate system could produce as much as 0.6°C (1.1°F) of additional warming. Consequently, some impacts from climate change are now considered unavoidable. Global climate change risks are shown in Table 5.7-3 and include impacts to public health, water resources, agriculture, sea level, forest and biological resources, and electricity impacts. Specific climate change impacts that could affect the SUP include health impacts from a reduction in air quality, water resources impacts from a reduction in water supply, and increased energy demand.

Table 5.7-3 Summary of Global Climate Change Risks to California

Impact Category	Potential Risk
Public Health Impacts	<ul style="list-style-type: none"> • Poor air quality made worse • More severe heat
Water Resources Impacts	<ul style="list-style-type: none"> • Decreasing Sierra Nevada snow pack • Challenges in securing adequate water supply • Potential reduction in hydropower • Loss of winter recreation
Agricultural Impacts	<ul style="list-style-type: none"> • Increasing temperature • Increasing threats from pests and pathogens • Expanded ranges of agricultural weeds • Declining productivity • Irregular blooms and harvests
Coastal Sea Level Impacts	<ul style="list-style-type: none"> • Accelerated sea level rise • Increasing coastal floods • Shrinking beaches • Worsened impacts on infrastructure
Forest and Biological Resource Impacts	<ul style="list-style-type: none"> • Increasing risk and severity of wildfires • Lengthening of the wildfire season • Movement of forest areas • Conversion of forest to grassland • Increasing threats from pest and pathogens • Declining forest productivity • Shifting vegetation and species distribution • Altered timing of migration and mating habits • Loss of sensitive or slow-moving species
Electricity	<ul style="list-style-type: none"> • Potential reduction in hydropower • Increased energy demand

Sources: California Energy Commission. 2006. Our Changing Climate, Assessing the Risks to California, 2006 Biennial Report, California Climate Change Center, CEC-500-2006-077; California Energy Commission (CEC). 2008. The Future Is Now, An Update on Climate Change Science, Impacts, and Response Options for California, CEC-500-2008-0077.

²² California Climate Action Team (CAT). 2006, March. Climate Action Team Report to Governor Schwarzenegger and the Legislature.

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The existing school uses within the boundaries of the LAUSD jurisdictional area currently generate GHG emissions from mobile sources, natural gas and electricity use, water use and generation of wastewater, solid waste, and area sources (e.g, household consumer products, landscaping equipment).

5.7.2 Thresholds of Significance

According to CEQA Guidelines Appendix G a project would normally have a significant effect on the environment if the project would:

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

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

5.7.2.1 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SCAQMD has adopted a significance threshold of 10,000 MTCO_{2e} per year for permitted (stationary) sources of GHG emissions where SCAQMD is the lead agency. To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD has convened a GHG CEQA Significance Threshold Working Group. Based on the last Working Group meeting (Meeting No. 15) in September 2010, SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. The proposed SCAQMD methodology in analyzing GHG impacts is based on a 4-tiered approach. For projects that do not meet the first two tiers, GHG emissions must be quantified and are compared to the AQMD screening threshold (3,000 MTCO_{2e}). If emissions are below the screening threshold then impacts are considered less than significant (i.e., Tier 3). If the emissions exceed the screening threshold then the emissions are compared to the per capita efficiency metric threshold of 4.8 MTCO_{2e} (i.e., Tier 4).

- **Tier 1.** If a project is exempt from CEQA, project-level and cumulative GHG emissions are less than significant.

- **Tier 2.** If the project complies with a GHG emissions reduction plan or mitigation program that avoids or substantially reduces GHG emissions in the project's geographic area (i.e., city or county), project-level and cumulative GHG emissions are less than significant.

For projects that are not exempt or where no qualifying GHG reduction plans are directly applicable, SCAQMD requires an assessment of GHG emissions. SCAQMD is proposing a “bright-line” screening-level threshold of 3,000 MTCO_{2e} annually for all land use types or the following land-use-specific thresholds: 1,400 MTCO_{2e} for commercial projects, 3,500 MTCO_{2e} for residential projects, or 3,000 MTCO_{2e} for mixed-use projects. This bright-line threshold is based on a review of the Governor's Office of Planning and Research database of CEQA projects. Based on their review of 711 CEQA projects, 90 percent of CEQA projects would exceed the bright-line thresholds identified above. Therefore, projects that do not exceed the

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bright-line threshold would have a nominal, and therefore, less than cumulatively considerable impact on GHG emissions:

- **Tier 3.** If GHG emissions are less than the screening-level threshold, project-level and cumulative GHG emissions are less than significant.
- **Tier 4.** If emissions exceed the screening threshold, a more detailed review of the project's GHG emissions is warranted.

SCAQMD has proposed an efficiency target for projects that exceed the screening threshold. The current recommended approach is per capita efficiency targets. SCAQMD is not recommending use of a percent emissions reduction target. Instead, SCAQMD proposes a 2020 efficiency target of 4.8 MTCO_{2e} per year per service population (MTCO_{2e}/Yr/SP) for project-level analyses and 6.6 MTCO_{2e}/Yr/SP for plan level projects (e.g., program-level projects such as general plans). Service population is defined as the sum of the residential and employment populations provided by a project. The per capita efficiency targets are based on the AB 32 GHG reduction target and 2020 GHG emissions inventory prepared for CARB's 2008 Scoping Plan.²³

5.7.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.7-1: SUP-related projects are not anticipated to generate GHG emissions that could exceed the thresholds and cumulatively contribute to GHG emissions impacts. [Threshold GHG-1]

GHG emissions related to a project are not confined to a particular air basin, but are dispersed worldwide. Therefore, impacts identified for a project are not project-specific impacts to global warming, but the project's contribution to this cumulative impact. Future school projects associated with the SUP would contribute to GHG emissions impacts through direct and indirect GHG emissions. The following discusses the potential impacts that could result from the types of project covered under the SUP.

New Construction on New Property and Existing Campus

While the SUP does not include any new school projects built on stand-alone sites, the following analysis is presented as a conservative, worst-case illustration of how projects implemented under the SUP would not exceed this threshold; SUP-related projects are not anticipated to exceed GHG significance thresholds.

Central Los Angeles High School No. 12 is an applicable project in the context of the SUP. This project entailed the construction of a 19-classroom high school facility on a 1.28-acre LAUSD-owned site, adjacent to the existing Miguel Contreras Learning Complex.

²³ SCAQMD took the 2020 statewide GHG reduction target for land-use-only GHG emissions sectors and divided it by the 2020 statewide employment for the land use sectors to derive a per capita GHG efficiency metric that coincides with the GHG reduction targets of AB 32 for year 2020.

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Projects under this category would generate direct GHG emissions from new vehicle trips and onsite area sources. Additionally, indirect emissions from offsite energy production required for onsite activities, water use, and waste disposal would also be generated. Overall, it is not anticipated that development of a school under this category would generate GHG emissions that would exceed the SCAQMD significance thresholds. Schools are typically growth accommodating land uses built to serve the local community; therefore, a new school would reduce the overall VMT in the region and thereby reduce mobile-source GHG emissions. In addition, the proposed SUP does not include any New School projects that would be built on stand-alone sites. Table 5.7-4 shows the total emissions generated from Central Region High School No. 12.

Table 5.7-4 GHG Emissions of an LAUSD School

Source	MTCO ₂ e/Year	Percent of Project Total
Central Los Angeles High School No. 12^a		
Area	0	0%
Energy	241	17%
Transportation	938	64%
Waste	227	16%
Water	39	1%
Amortized Construction Emissions ^b	30	2%
Total	1,475	100%
Proposed SCAQMD Bright-Line Screening Threshold	3,000 MTons	NA
Exceeds Proposed Bright-Line Screening Threshold?	No	NA

Sources: High School: LAUSD, Central Los Angeles High School No. 12 Draft EIR, pg. 3B-16, certified July 12, 2011.

Notes: MTCO₂e: metric tons of CO₂ equivalent GHG emissions. The sum of the emissions does not equal 100 percent of the total emissions due to rounding.

^a Based on 55,361 building square feet of school facilities, capacity of 500 high school students, and 855 average daily trips generated.

^b As construction emissions are short-term, they are amortized over 30 years per SCAQMD methodology.²⁴

As shown in the table, development of a new school adjacent to an existing school would not exceed the proposed SCAQMD significance thresholds of 3,000 MTons. Future school projects would comply with the Scoping Plan early action statewide measures (e.g., LCFS and RPS) and would also be built to meet the latest Building Energy Efficiency Standards and CALGreen. Compliance with these statewide requirements and measures would reduce GHG emissions.

While individual projects under LAUSD's School Upgrade Program would be less than SCAQMD's bright-line threshold and/or efficiency metric, it is unknown how many individual projects may occur under the SUP. However, the 10-year projection for the overall student population within the LAUSD jurisdiction indicates an overall 2.2 decrease from existing conditions (see Chapter 4 of this EIR). Additionally, the long-range 50-year projection for Los Angeles County also indicates an overall decline compared to the existing student population. As new schools would generally be developed to accommodate growth and the overall student population would be on the decline, it is anticipated that development of new, stand-alone schools or expansion of an existing campus to include a new school component (e.g., addition of an elementary school

²⁴ South Coast Air Quality Management District. 2010, September 28. Greenhouse Gases (GHG) CEQA Significance Thresholds Working Group Meeting 15. <http://www.aqmd.gov/hb/2008/December/081231a.htm>; <http://www.aqmd.gov/ceqa/handbook/GHG/2010/sept28mtg/sept29.html>

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to an existing middle school campus) would be minimal. The overall operational phase emissions generated by cumulative projects under the SUP would not be cumulatively considerable. Therefore, GHG emissions generated by the combination of the types of projects described in Chapter 4, *Program Description*, are considered less than significant.

Modernization, Repair, Replacement, Upgrade, Remodel, Renovation and Installation

Building improvements are anticipated to result in increased energy efficiency, thereby reducing emissions from energy usage (i.e., natural gas and electricity). Most SUP-related projects involving repair, replacement, upgrades, remodeling, or renovation would not increase capacity to existing schools. However, some modernization projects may potentially add new capacity to existing schools through the installation of portables (see Chapter 4, Table 4-2 of this EIR). Overall student enrollment in the LAUSD is projected to decline for the next 10 years; therefore, it is anticipated that any new portables would primarily be installed to accommodate the existing enrolled student population. Additionally, if the installation of portables is required to accommodate growth, it is anticipated that emissions would be significantly less than the emissions shown in Table 5.7-4. Therefore, the cumulative contribution to GHG emissions from SUP-related projects under this category would less than significant.

Impact 5.7-2: The SUP would not conflict with plans adopted for the purpose of reducing GHG emissions. [Threshold GHG-2]

All SUP Projects

This section includes a consistency analysis with applicable plans adopted for the purpose of reducing GHG emissions (CARB's Scoping Plan and SCAG's 2012 Regional Transportation Plan/Sustainable Community Strategy [RTP/SCS]).

CARB Scoping Plan

In accordance with AB 32, CARB developed the 2008 Scoping Plan to outline the state's strategy to achieve 1990 level emissions by year 2020. To estimate the reductions necessary, CARB projected statewide 2020 BAU GHG emissions (i.e., GHG emissions in the absence of statewide emission reduction measures). CARB identified that the state as a whole would be required to reduce GHG emissions by 28.5 percent from year 2020 BAU to achieve the targets of AB 32.²⁵ The revised BAU 2020 forecast shows that the state would have to reduce GHG emissions by 21.6 percent from BAU without Pavley and the 33 percent RPS or 15.7 percent from the adjusted baseline (i.e., with Pavley and 33 percent RPS).²⁶

Since adoption of the 2008 Scoping Plan, state agencies have adopted programs identified in the plan, and the legislature has passed additional legislation to achieve the GHG reduction targets. Statewide strategies to reduce GHG emissions include the LCFS, California Appliance Energy Efficiency regulations, California Building Standards (i.e., CALGreen and the 2013 Building Energy Efficiency Standards), 33 percent RPS, and

²⁵ California Air Resources Board. 2008, October. Climate Change Proposed Scoping Plan, a Framework for Change.

²⁶ California Air Resources Board. 2012. Status of Scoping Plan Recommended Measures. http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf.

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changes in the corporate average fuel economy standards (e.g., Pavley I and California Advanced Clean Cars [Pavley II]). According to the 2013 update to the Scoping Plan, the state is on track to achieving the 2020 targets of AB 32.²⁷ Future SUP-related projects would comply with these GHG emissions reduction measures. In addition, implementation of the District Standards as outlined in School Design Guide (January 2014) would require construction contractors to reuse, recycle, and salvage nonhazardous materials generated during demolition and/or new construction. Materials recovery would minimize the need to transport new materials from farther distances and production of new materials and thereby reduce emissions from mobile sources and energy usage. Therefore, the SUP would not conflict the CARB Scoping Plan.

SCAG's 2012 Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2012 RTP/SCS was adopted April 4, 2012. It identifies multimodal transportation investments, including bus rapid transit, light rail transit, heavy rail transit, commuter rail, high-speed rail, active transportation strategies (e.g., bike ways and sidewalks), transportation demand management strategies, transportation systems management, highway improvements (interchange improvements, high-occupancy vehicle lanes, high-occupancy toll lanes), arterial improvements, goods movement strategies, aviation and airport ground access improvements, and operations and maintenance to the existing multimodal transportation system. SCAG's RTP/SCS identifies land use strategies that focus new housing and job growth in areas served by high quality transit areas and other opportunity areas, and that would be consistent with a land use development pattern that supports and complements the proposed transportation network, which emphasizes system preservation, active transportation, and transportation demand management measures. The 2012 RTP/SCS incorporates local land use projections and circulation networks from the cities' and counties' general plans. The projected regional development pattern, including location of land uses and residential densities in local general plans, when integrated with the proposed regional transportation network identified in the 2012 RTP/SCS, would reduce per capita vehicular travel-related GHG emissions and achieve the GHG reduction per capita targets for the SCAG region.

Development of new schools associated with the SUP would fill the educational needs of the local communities. Schools that serve the local community would reduce the average travel distance for students and could also promote non-motorized travel (e.g., walking and biking) thereby reducing the overall VMT. A reduction in the overall VMT would reduce GHG emissions from mobile sources. Therefore, the SUP would not conflict with the 2012 RTP/SCS and impacts would be less than significant.

5.7.4 Applicable Regulations and Standard Conditions

State

- CARB Rule 2480 (13 CCR 2480)
- CARB Rule 2485 (13 CCR 2485)
- Executive Order S-3-05: Greenhouse Gas Emission Reduction Targets

²⁷ California Air Resources Board. 2014, February 10. Proposed First Update to the Climate Change Scoping: Building on the Framework. http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf.

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- AB 32: California Global Warming Solutions Act
- SB 375: Sustainable Communities Strategies
- AB 1493: Pavley Fuel Efficiency Standards
- Title 20 California Code of Regulations: Appliance Energy Efficiency Standards
- Title 17 California Code of Regulations: Low Carbon Fuel Standard
- AB 1881: California Water Conservation in Landscaping Act of 2006
- SB 1368: Statewide Retail Provider Emissions Performance Standards
- SB 1078: Renewable Portfolio Standards
- Title 24, Part 6, California Code of Regulations: Building and Energy Efficiency Standards
- Title 24, Part 11, California Code of Regulations: Green Building Standards Code

LAUSD Standards

- School Design Guide. January 2014 (includes Specification 01340, Construction & Demolition Waste Management, July 7, 2003)
- Project Design Features: PDF GHG-1, PDF GHG-2, PDF GHG-3, PDF GHG-4, PDF GHG-5.

5.7.5 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and LAUSD Standards listed above, Impacts 5.7-1 and 5.7.2 would be less than significant.

5.7.6 Mitigation Measures

No mitigation measures are required.

5.7.7 Level of Significance After Mitigation

Impacts would be less than significant.

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