4.7 Greenhouse Gas Emissions

This section evaluates the potential for impacts on greenhouse gas (GHG) emissions resulting from implementation of the proposed French Hotel Project (Project). This section is partially based on the following technical report:

- Air Quality Analysis for French Hotel Project. MIG, November 24, 2025 (Appendix B).

A Notice of Preparation for the Project was released for public review on March 19, 2026, and an Environmental Impact Report (EIR) Scoping meeting was held on April 6, 2026. No comments were made during the public scoping period that pertain to GHG emissions. Additionally, no comments related to GHG emissions were received during the public scoping meeting.

4.7.1 Environmental Setting

The following sections describe the environmental setting for the Project as it relates to GHG emissions.

4.7.2 Regulatory Setting

This section describes the federal, state, and local regulatory framework adopted to address GHG emissions.

4.7.2.1 Federal

Federal Regulation and the Clean Air Act

Prior to the last decade, there have been no concrete federal regulations of GHGs or major planning for climate change adaptation. The following are actions regarding the federal government, GHGs, and fuel efficiency.

In Massachusetts v. Environmental Protection Agency 549 U.S. 497 (2007), decided on April 2, 2007, the United States Supreme Court (Supreme Court) found that four GHGs, including CO_2, are air pollutants subject to regulation under Section 202(a)(1) of the Clean Air Act (CAA). The Supreme Court held that the U.S. Environmental Protection Agency (USEPA) Administrator must determine whether emissions of GHGs from new motor vehicles cause or contribute to air pollution, which may reasonably be anticipated to endanger public health or welfare, or whether the science is too uncertain to make a reasoned decision. On December 7, 2009, the USEPA Administrator signed two distinct findings regarding GHGs under Section 202(a) of the CAA:

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHGs— CO2, CH_4, N2O, HFCs, PFCs, and SF6 —in the atmosphere threaten the public health and welfare of current and future generations.

- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

These findings do not impose requirements on industry or other entities. However, this was a prerequisite for implementing GHG emissions standards for vehicles. After a lengthy legal challenge, the Supreme Court declined to review an Appeals Court ruling that upheld the USEPA Administrator's findings.

Safer Affordable Fuel-Efficient Vehicles Part One: National Program

The Safer Affordable Fuel-Efficient (SAFE) Rule, adopted by the USEPA in September 2019, revokes California's authority to set its own GHG emissions standards and zero-emission vehicle mandates in California. The SAFE Rule affects California's federally approved on-road mobile source emissions inventory model (Emission Factor), which reflects California-specific driving and environmental conditions, fleet mix, and the impact of California's unique mobile source regulations, such as the Low-Emission Vehicle (LEV) program, including the LEV II and LEV III standards; California inspection and maintenance programs; and California's in-use diesel fleet rules.

U.S. Environmental Protection Agency

The USEPA is responsible for implementing federal policy to address global climate change. In 2009, the USEPA issued a Final Rule for mandatory reporting of GHG emissions, which applies to fossil fuel and industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty and off-road vehicles and requires annual emissions reporting. This rule does not regulate the emission of GHGs; it only requires the monitoring and reporting of GHG emissions for those sources above certain thresholds.

Executive Order 13990

On January 20, 2021, federal agencies were directed to immediately review, and take action to address, federal regulations promulgated and other actions taken during the last 4 years that conflict with national objectives to improve public health and the environment; ensure access to clean air and water; limit exposure to dangerous chemicals and pesticides; hold polluters accountable, including those who disproportionately harm communities of color and low-income communities; reduce GHG emissions; bolster resilience to the impacts of climate change; restore and expand our national treasures and monuments; and prioritize both environmental justice and employment.

4.7.2.2 State

Assembly Bill 32: California Global Warming Solutions Act

The California State Legislature enacted AB 32, which required that GHGs emitted in California be reduced to 1990 levels by the year 2020 (this goal has been met). GHGs as defined under AB 32

include CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. Since AB 32 was enacted, a seventh chemical, NF3, has also been added to the list of GHGs. CARB is the state agency charged with monitoring and regulating sources of GHGs. Pursuant to AB 32, CARB adopted regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. AB 32 states the following:

> "Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems."

Senate Bill 32: California Global Warming Solutions Act

On September 8, 2016, Governor Brown signed SB 32 and its companion bill, AB 197. SB 32 requires the state to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, a reduction target that was first introduced in Executive Order B-30-15. The new legislation builds upon the AB 32 goal and provides an intermediate goal to achieving S-3-05, which sets a statewide GHG reduction target of 80 percent below 1990 levels by 2050. AB 197 creates a legislative committee to oversee regulators to ensure that CARB not only responds to the Governor, but also the Legislature.

2022 CARB Scoping Plan

On December 15, 2022, CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to "deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor." The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world. Unlike the 2017 Scoping Plan, CARB no longer includes a numeric per capita threshold and instead advocates for compliance with a local GHG reduction strategy (CAP) consistent with California Environmental Quality Act (CEQA) Guidelines, Section 15183.5.

The key elements of the 2022 CARB Scoping Plan focus on transportation—the regulations that will impact this sector are adopted and enforced by CARB on vehicle manufacturers and outside the jurisdiction and control of local governments. As stated in the Plan's executive summary:

> The major element of this unprecedented transformation is the aggressive reduction of fossil fuels wherever they are currently used in California, building on and accelerating carbon reduction programs that have been in place for a decade and a half. That means rapidly moving to zero-emission transportation; electrifying the cars, buses, trains, and trucks that now constitute California's single largest source of planet-warming pollution.
>
> [A]pproval of this plan catalyzes a number of efforts, including the development of new regulations as well as amendments to strengthen regulations and programs already in place, not just at CARB but across state agencies.

Under the 2022 Scoping Plan, the State of California will lead efforts to meet the 2045 carbon neutrality goal through implementation of the following objectives:

- Reimagine roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Double local transit capacity and service frequencies by 2030.
- Complete the High-Speed Rail (HSR) System and other elements of the intercity rail network by 2040.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Increase availability and affordability of bikes, e-bikes, scooters, and other alternatives to light-duty vehicles, prioritizing needs of underserved communities.
- Shift revenue generation for transportation projects away from the gas tax into more durable sources by 2030. • Authorize and implement roadway pricing strategies and reallocate revenues to equitably improve transit, bicycling, and other sustainable transportation choices.
- Prioritize addressing key transit bottlenecks and other infrastructure investments to improve transit operational efficiency over investments that increase VMT.
- Develop and implement a statewide transportation demand management (TDM) framework with VMT mitigation requirements for large employers and large developments.
- Prevent uncontrolled growth of autonomous vehicle (AV) VMT, particularly zero-passenger miles.
- Channel new mobility services towards pooled use models, transit complementarity, and lower VMT outcomes.
- Establish an integrated statewide system for trip planning, booking, payment, and user accounts that enables efficient and equitable multimodal systems.
- Provide financial support for low-income and disadvantaged Californians' use of transit and new mobility services.
- Expand universal design features for new mobility services.

- Accelerate infill development in existing transportation-efficient places and deploy strategic resources to create more transportation-efficient locations.
- Encourage alignment in land use, housing, transportation, and conservation planning in adopted regional plans (RTP/SCS and RHNA) and local plans (e.g., general plans, zoning, and local transportation plans).
- Accelerate production of affordable housing in forms and locations that reduce VMT and affirmatively further fair housing policy objectives.
- Reduce or eliminate parking requirements (and/or enact parking maximums, as appropriate) and promote redevelopment of excess parking, especially in infill locations.
- Preserve and protect existing affordable housing stock and protect existing residents and businesses from displacement and climate risk.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development to determine consistency with the 2022 Scoping Plan. Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): ". . . focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

Additionally, on Page 21 in Appendix D, CARB states: "The recommendations outlined in this section apply only to residential and mixed-use development project types. California currently faces both a housing crisis and a climate crisis, which necessitates prioritizing recommendations for residential projects to address the housing crisis in a manner that simultaneously supports the State's GHG and regional air quality goals. CARB plans to continue to explore new approaches for other land use types in the future." As such, it would be inappropriate to apply the requirements contained in Appendix D of the 2022 Scoping Plan to any land use types other than residential or mixed-use residential development.

Assembly Bill 341: Commercial Recycling

AB 341 sets a statewide goal of 75 percent recycling, composting, or source reduction of solid waste by the year 2020. As required by AB 341, the California Department of Resources Recycling and Recovery (CalRecycle) adopted the Mandatory Commercial Recycling Regulation on January 17, 2012. The regulation was approved by the Office of Administrative Law on May 7, 2012. It became effective immediately and clarified the responsibilities in implementing mandatory commercial

recycling. The Mandatory Commercial Recycling Regulation focuses on increased commercial waste diversion as a method to reduce GHG emissions. The regulation is designed to achieve a 5 MMT CO_2 reduction in GHG emissions, which equates to roughly an additional 2–3 MT CO_2 of currently disposed commercial solid waste being recycled by 2020 and thereafter.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required the California Energy Commission (CEC) to prepare a state plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels Plan in partnership with CARB and in consultation with other state, federal, and local agencies. The State Alternative Fuels Plan presents strategies and actions that California must take to increase the use of alternative nonpetroleum fuels in a manner that minimizes the costs to California and maximizes the economic benefits of in-state production. The State Alternative Fuels Plan assesses various alternative fuels and develops fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-state production of biofuels without causing a significant degradation of public health and environmental quality.

Assembly Bill 1493: Clean Car Standards

The second phase of the implementation for the Pavley Bill was incorporated into Amendments to the Low-Emission Vehicle Program (LEV III) or the Advanced Clean Cars Program. The Advanced Clean Cars Program combines the control of smog-causing pollutants and GHG emissions into a single coordinated package of requirements for MY 2017 through 2025. The regulation will reduce GHGs from new cars by 34 percent from 2016 levels by 2025. The new rules will clean up gasoline and diesel-powered cars, and deliver increasing numbers of zero-emission technologies, such as full battery electric cars, newly emerging plug-in hybrid electric vehicle (EV) and hydrogen fuel cell cars. The package will also ensure adequate fueling infrastructure is available for the increasing numbers of hydrogen fuel cell vehicles planned for deployment in California. On March 9, the USEPA reinstated California's authority under the CAA to implement its own GHG emission standards for cars and light trucks, which other states can also adopt and enforce. With this authority restored, the USEPA will continue partnering with states to advance the next generation of clean vehicle technologies.

California Code of Regulations Title 24, Part 6

California Code of Regulations, Title 24, Part 6 (California's Energy Efficiency Standards for Residential and Nonresidential Buildings), was established in 1978 to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although the standards were not originally intended to reduce GHG emissions, electricity production by fossil fuels and natural

gas use result in GHG emissions, and energy-efficient buildings require less electricity and natural gas. Therefore, increased energy efficiency results in decreased GHG emissions.

The CEC adopted its 2008 Standards on April 23, 2008, in response to AB 32. The 2008 Standards were adopted to (1) provide California with an adequate, reasonably priced, and environmentally sound supply of energy; (2) pursue California energy policy, which states that energy efficiency is the resource of first choice for meeting California's energy needs; (3) meet the West Coast Governors' Global Warming Initiative commitment to include aggressive energy efficiency measures into updates of state building codes every 3 years; and (4) meet the requirements of EO B-18-12 and those in the Green Building Initiative to improve the energy efficiency of non-residential buildings through aggressive standards. The latest update of the California Code of Regulations, Title 24, Part 6, which went into effect on January 1, 2020, significantly increases the energy efficiency of new residential buildings.

California Green Building Standards Code (California Code of Regulations, Title 24, Part 11)

The California Green Building Standards Code (CALGreen) was adopted in 2010 and went into effect on January 1, 2011. Further updates to CALGreen went into effect on January 1, 2017, and January 1, 2020. CALGreen is the first statewide mandatory green building code and significantly raises the minimum environmental standards for construction of new buildings in California. The mandatory provisions in CALGreen reduce the use of volatile organic compound-emitting materials, strengthen water conservation, and require construction waste recycling.

Executive Order B-30-15: 2030 Greenhouse Gas Emissions Reduction Target

On April 29, 2015, Governor Jerry Brown announced through EO B-30-15 the following GHG emissions target:

- By 2030, California shall reduce GHG emissions to 40 percent below 1990 levels.

The emissions reduction target of 40 percent below 1990 levels by 2030 is an interim-year goal to make it possible to reach the ultimate goal of reducing emissions 80 percent under 1990 levels by 2050. The EO directs CARB to provide a plan with specific regulations to reduce statewide sources of GHG emissions. EO B-30-15 does not include a specific guideline for local governments.

Executive Order N-79-20: Zero-Emission Vehicles

EO N-79-20, signed by Governor Gavin Newsom on September 23, 2020, directs the state to require that, by 2035, all new cars and passenger trucks sold in California be zero-emission vehicles to reduce transportation GHG emissions, the primary source of emissions in the state. Following the EO, CARB will develop regulations to mandate that 100 percent of in-state sales of new passenger

cars and trucks are zero emission by 2035 and that all operations of medium- and heavy-duty vehicles shall be 100 percent zero emission by 2045 where feasible.

Executive Order S-01-07: Low Carbon Fuel Standard

In 2007, Governor Arnold Schwarzenegger signed EO S-01-07, which mandates (1) that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020, and (2) that a low carbon fuel standard (LCFS) for transportation fuels be established in California. CARB developed the LCFS regulation pursuant to the state's authority under AB 32 and the federal CAA and adopted it in 2009.

Executive Order S-06-06: Biofuel and Biopower Production Targets

EO S-06-06, signed on April 25, 2006, by Governor Schwarzenegger, establishes targets for the use and production of biofuels and biopower, and directs state agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The EO establishes the following targets to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050. The EO also calls for the state to meet a target for use of biomass electricity. The 2011 Bioenergy Action Plan identifies those barriers and recommends actions to address them so the state can meet its clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 plan and provides a more detailed action plan to achieve the following goals (BIWG 2012):

- Increase environmentally and economically sustainable energy production from organic waste;
- Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications;
- Create jobs and stimulate economic development, especially in rural regions of the state; and
- Reduce fire danger, improve air and water quality, and reduce waste.

As of 2016, 2.7 percent of the total electricity system power in California was derived from biomass.

Executive Order S-3-05: Greenhouse Gas Emissions Reduction Targets

On June 1, 2005, Governor Schwarzenegger announced, through EO S-3-05, the following GHG emissions targets:

- By 2010, California shall reduce GHG emissions to 2000 levels.
- By 2020, California shall reduce GHG emissions to 1990 levels.
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

EO S-3-05 also laid out state agencies' responsibilities for implementation and reporting on progress toward these targets.

Executive Order S-13-08: Climate Change Adaptation

Executive Order S-13-08 states that "climate change in California during the next century is expected to shift precipitation patterns, accelerate sea-level rise and increase temperatures, thereby posing a serious threat to California's economy, to the health and welfare of its population and to its natural resources." Pursuant to the requirements in the Order, the 2009 California Climate Adaptation Strategy was adopted, which is the "…first statewide, multi-sector, region-specific, and information-based climate change adaptation strategy in the United States." Objectives include analyzing risks of climate change in California, identifying, and exploring strategies to adapt to climate change, and specifying a direction for future research.

Senate Bill 97: California Environmental Quality Act Greenhouse Gas Emissions

SB 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. The legislation directed the California Governor's Office of Planning and Research (since renamed the Governor's Office of Land Use and Climate Innovations) to develop Draft CEQA Guidelines "for the mitigation of GHG emissions or the effects of GHG emissions" and directed the resources agency to certify and adopt the CEQA Guidelines. CEQA Guidelines, Section 15183.5, Tiering and Streamlining the Analysis of GHG Emissions, was added as part of the CEQA Guidelines amendments that became effective in 2010 and describes the criteria needed in a GHG reduction plan that would allow for tiering and streamlining of CEQA analysis for development projects.

Senate Bill 350: California Renewables Portfolio Standards Program

The California Renewables Portfolio Standards (RPS) program was established in 2002 under SB 1078 and accelerated in 2006 under SB 107 by requiring that 20 percent of electricity retail sales be served by renewable energy sources by 2010. Subsequent recommendations in California energy policy reports advocated a goal of 33 percent by 2020, and on November 17, 2008, Governor Schwarzenegger signed EO S-14-08, requiring electricity retailers to serve 33 percent of their load with renewable energy by 2020. In April 2011, SB X1-2 codified EO S-14-08, setting the new RPS targets at 20 percent by the end of 2013, 25 percent by the end of 2016, and 33 percent by the end of 2020 for electricity retailers. Most recently, Governor Brown signed SB 350 in October 2015, which extended the RPS target by requiring retail sellers to procure 50 percent of their electricity from renewable energy resources by 2030.

Senate Bill 375: Sustainable Communities Strategy

SB 375 was adopted in 2008 and provides a new planning process that coordinates land use planning, Regional Transportation Plans, and funding priorities to help California meet the GHG

reduction goals established in AB 32. SB 375 requires Regional Transportation Plans, developed by Metropolitan Planning Organizations, to incorporate a Sustainable Communities Strategy in their Regional Transportation Plans. The goal of the Sustainable Communities Strategy is to reduce regional vehicle miles traveled (VMT) through land use planning and consequent transportation patterns. SB 375 also includes provisions for streamlined CEQA review for some infill projects, such as transit-oriented development.

Clean Energy and Pollution Reduction Act of 2015 (SB 350)

In October 2015, the Legislature approved, and Governor Jerry Brown signed SB 350, which reaffirms California's commitment to reducing its GHG emissions and addressing climate change. Key provisions include an increase in the RPS, higher energy efficiency requirements for buildings, initial strategies toward a regional electricity grid, and improved infrastructure for EV charging stations. Provisions for a 50 percent reduction in the use of petroleum statewide were removed from the Bill because of opposition and concern that it would prevent the Bill's passage. Specifically, SB 350 requires the following to reduce statewide GHG emissions:

- Increase the amount of electricity procured from renewable energy sources from 33% to 50% by 2030, with interim targets of 40% by 2024, and 25% by 2027.
- Double the energy efficiency in existing buildings by 2030. This target would be achieved through the California Public Utilities Commission (CPUC), the California Energy Commission (CEC), and local publicly owned utilities.
- Reorganize the Independent System Operator (ISO) to develop more regional electrify transmission markets and to improve accessibility in these markets, which would facilitate the growth of renewable energy markets in the western United States.

4.7.2.3 Regional

South Coast Air Quality Management District

South Coast Air Quality Management District (SCAQMD) is the agency responsible for air quality planning and regulation in the South Coast Air Basin. The SCAQMD addresses the impacts to climate change of projects subject to SCAQMD permit as a lead agency if they are the only agency having discretionary approval for the Project and acts as a responsible agency when a land use agency must also approve discretionary permits for the project. The SCAQMD acts as an expert commenting agency for impacts to air quality. This expertise carries over to GHG emissions, so the agency helps local land use agencies through the development of models and emission thresholds that can be used to address GHG emissions.

In 2008, SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the South Coast Air Basin. The Working Group developed several different options that are contained in the SCAQMD Draft Guidance

Document – Interim CEQA GHG Significance Threshold, which could be applied by lead agencies. The working group has not provided additional guidance since release of the interim guidance in 2008. The SCAQMD Board has not approved the thresholds; however, the Guidance Document provides substantial evidence supporting the approaches to significance of GHG emissions that can be considered by the lead agency in adopting its own threshold. The current interim thresholds consist of the following tiered approach.

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
  - Residential and commercial land use: 3,000 MTCO2e/yr
  - Industrial land use: 10,000 $MTCO_2e$/yr o Based on land use type: residential: 3,500 $MTCO_2e$/yr; commercial: 1,400 $MTCO_2e$/yr; or mixed use: 3, $MTCO_2e$/yr
- Tier 4 has the following options:
  - Option 1: Reduce Business-as-Usual (BAU) emissions by a certain percentage; this percentage is currently undefined.
  - Option 2: Early implementation of applicable AB 32 Scoping Plan measures
  - Option 3: 2020 target for service populations (SP), which includes residents and employees: 4.8 $MTCO_2e$ per SP per year for projects and 6.6 $MTCO_2e$ per SP per year for plans;
  - Option 3, 2035 target: 3.0 $MTCO_2e$ per SP per year for projects and 4.1 $MTCO_2e$ per SP per year for plans
- Tier 5 involves mitigation offsets to achieve target significance threshold.

The SCAQMD's interim thresholds used the Executive Order S-3-05-year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2 concentrations at 450 ppm, thus stabilizing global climate.

SCAQMD only has authority over GHG emissions from development projects that include air quality permits. At this time, it is unknown if the Project would include stationary sources of

emissions subject to SCAQMD permits. Notwithstanding, if the Project requires a stationary permit, it would be subject to the applicable SCAQMD regulations.

SCAQMD Regulation XXVII, adopted in 2009 includes the following rules:

- Rule 2700 defines terms and post global warming potentials.
- Rule 2701, SoCal Climate Solutions Exchange, establishes a voluntary program to encourage, quantify, and certify voluntary, high quality certified GHG emission reductions in the South Coast AQMD.
- Rule 2702, GHG Reduction Program created a program to produce GHG emission reductions within the South Coast AQMD. The South Coast AQMD would fund projects through contracts in response to requests for proposals or purchase reductions from other parties.

4.7.2.4 Local

City of San Juan Capistrano General Plan

A complete rewrite of the City's General Plan was last adopted in December 1999. In May 2002, the City Council approved a variety of changes to several of elements of the General Plan. In February 2022, a new Environmental Justice Element was added to the General Plan. The General Plan's Housing Element is updated every eight years with the latest update adopted in August 2022. The City's General Plan is the principal land use document guiding development in the City. The City's General Plan is a comprehensive plan that establishes goals, objectives, and policies intended to guide growth and development in the City. The General Plan also serves as a blueprint for development throughout the community and is the vehicle through which the community needs, desires, and aspirations are balanced. The San Juan Capistrano General Plan is the fundamental tool for influencing the quality of life in the City.

Conservation and Open Space Element

The Conservation and Open Space Element addresses the conservation and enhancement of the visual quality of the City. The goals and policies in the Community Design Element aim to protect natural hillsides and features in the City (e.g., creeks and floodplains), preserve and enhance the historic character of the community, incorporate new development into existing developed neighborhoods, and maintain the community's "small-village" and "rural atmosphere."

The following policies applicable to the Project and related to energy are presented in the Conservation and Open Space Element:

- **Goal COS-6:** Improve air quality.

- **Policy COS-6.1:** Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.
- **Policy COS-6.2:** Cooperate and participate in regional air quality management planning, programs, and enforcement measures.
- **Policy COS-6.4:** Achieve a greater balance between jobs and housing in San Juan Capistrano.
- **Policy COS-6.5:** Integrate air quality planning with land use and transportation planning.

Environmental Justice Element

The Environmental Justice Element of the City of San Juan Capistrano General Plan was adopted in 2022 and addresses the equitable distribution of environmental benefits and burdens throughout the community. The element identifies goals and policies intended to improve public health, reduce exposure to pollution, increase access to parks and active transportation facilities, promote safe and healthy neighborhoods, support sustainable land use and transportation planning, and encourage meaningful community engagement in planning and decision-making processes. The element also promotes equitable access to public services, infrastructure, housing, and environmental resources while supporting long-term community resilience and quality of life.

- **Goal EJ-1:** Promote land use and development patterns that reduce air pollution exposure and improve respiratory health for residents of the Community of Focus.
  - **Policy EJ-1.1:** Partner with the South Coast Air Quality Management District to monitor local air quality and identify main pollution sources.
- **Goal EJ-2:** Proactively take actions to address potential negative impacts of climate change on the most vulnerable residents and adopt strategies to mitigate impacts and promote adaptation and resiliency for residents in the Community of Focus.
  - **Policy EJ-2.1:** Incorporate climate change and climate variability into planning, health, and emergency preparedness plans and guidance to increase preparedness for natural hazards exacerbated by climate change, especially among vulnerable populations.
  - **Policy EJ-2.2:** Work with federal, state, and county governments to identify opportunities and investments to create jobs that are safe and sustainable and promote clean energy solutions.

4.7.3 Existing Conditions

4.7.3.1 Global Climate Change Overview

Climate change refers to any substantial change in measures of climate (such as temperature, precipitation, or wind) lasting for decades or longer. Earth's climate has changed many times during the planet's history, including events ranging from ice ages to long periods of warmth. Historically, natural factors, such as volcanic eruptions, changes in Earth's orbit, and the amount of energy released from the sun, have affected Earth's climate. Some GHGs, such as water vapor, occur naturally and are emitted to the atmosphere through natural processes, while others are emitted through human activities. Beginning in the late 18th century, human activities associated with the Industrial Revolution changed the composition of the atmosphere and, therefore, very likely influenced Earth's climate.

The accumulation of GHGs in the atmosphere regulates Earth's temperature. Without the natural heat-trapping effects of GHGs, Earth's temperature would be approximately 86 degrees Fahrenheit (°F) cooler (Riebeek 2010). However, it is believed that emissions from human activities, such as electricity production and vehicle use, have elevated the concentration of GHGs in the atmosphere beyond the level of naturally occurring concentrations.

The Global Carbon Project (2020) released an update of the global carbon budget for the year 2019. The atmospheric carbon dioxide (CO_2) concentration in 2019 was 410 parts per million (ppm), 48 percent above the concentration at the start of the Industrial Revolution (about 280 ppm in 1750). Global GHG emissions experienced an unprecedented drop in 2020 but are likely to rebound in 2021. It is projected that global fossil fuel CO_2 equivalent (CO_2e) emissions in 2021 will rebound 4.9 percent compared to 2020 to 36.4 billion MT CO_2, returning to nearly 2019 emission levels of 36.7 billion MT CO_2. The annual mean growth rate of atmospheric CO_2 has shown a steady increase. The highest growth rates since 1960 occurred in 1987, 1998, and 2015–2016, even reflecting a strong El Niño, which weakens the land sink effect (Jackson et al. 2021).

4.7.3.2 Greenhouse Gases

GHGs are present in the atmosphere naturally, released by natural sources, or formed from secondary reactions taking place in the atmosphere. The following gases are widely seen as the principal contributors to human-induced global climate change:[1]

- CO_2
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)

[1] The GHGs listed are consistent with the definition in Assembly Bill (AB) 32 (California Government Code, Section 38505), as discussed in this section.

- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF_6)

Over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions increase GHG concentrations in the atmosphere and enhance the natural greenhouse effect, which scientists believe can cause global warming. While GHGs produced by human activities include naturally occurring GHGs (e.g., CO_2, CH_4, and N_2O), some gases (e.g., HFCs, PFCs, and SF_6) are completely new to the atmosphere. Certain other gases (e.g., water vapor) are short lived in the atmosphere compared to these GHGs, which remain in the atmosphere for significant periods of time and contribute to climate change in the long term. Water vapor is generally excluded from the list of GHGs because it is short lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes (e.g., oceanic evaporation). For the purposes of this EIR, the term "GHGs" will refer collectively to the six gases identified in the bulleted list provided above. The following discussion summarizes the characteristics of the six primary GHGs.

Carbon Dioxide

In the atmosphere, carbon generally exists in its oxidized form as CO_2. Natural sources of CO_2 include the respiration (breathing) of humans, animals, and plants; volcanic outgassing; decomposition of organic matter; and evaporation from the oceans. Human-caused sources of CO_2 include the combustion of fossil fuels and wood, waste incineration, mineral production, and deforestation. Earth maintains a natural carbon balance, and when concentrations of CO_2 are upset, the system gradually returns to its natural state through natural processes. Natural changes to the carbon cycle work slowly, especially compared to the rapid rate at which humans are adding CO_2 to the atmosphere. Natural removal processes (e.g., photosynthesis by land- and ocean-dwelling plant species) cannot keep pace with this extra input of human-made CO_2, and consequently, the gas is building up in the atmosphere. The concentration of CO_2 in the atmosphere has risen approximately 30 percent since the late 1800s.

Methane

CH_4 is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources of CH_4 include fires, geologic processes, and bacteria that produce CH_4 in a variety of settings (most notably wetlands). Anthropogenic sources include rice cultivation, livestock, landfills and waste treatment, biomass burning, and fossil fuel combustion (e.g., the burning of coal, oil, and natural gas). As with CO_2, the major removal process of atmospheric CH_4 (a chemical breakdown in the atmosphere) cannot keep pace with source emissions, and CH_4 concentrations in the atmosphere are increasing.

Nitrous Oxide

N_2O is produced naturally by a variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural source emissions. N_2O is also a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion sources emit N_2O. The quantity of N_2O emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N_2O emissions in the state.

Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride

HFCs are primarily used as substitutes for ozone (O_3)-depleting substances regulated under the Montreal Protocol.[2] PFCs and SF_6 are emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. No aluminum or magnesium production occurs in the State of California; however, rapid growth in the semiconductor industry, which is active in the state, has led to greater use of PFCs.

Global Warming Potential

The GHGs described previously vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another GHG. GWP is based on several factors, including the relative effectiveness of a GHG in absorbing infrared radiation and the length of time that the GHG remains in the atmosphere (referred to as "atmospheric lifetime"). The GWP of each GHG is measured relative to CO_2, the most abundant GHG. The definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of MT[3] of CO_2e. For example, N_2O is 298 times more potent at contributing to global warming than CO_2. Table 4.7-1, Global Warming Potential for Selected Greenhouse Gases, identifies the GWP for each relevant GHG.

Table 4.7-1. Global Warming Potential for Selected Greenhouse Gases

Pollutant	Atmospheric Lifetime (Years)	GWP (100-Year)[2]
CO_2	~100[1]	1
CH_4	12	28
N_2O	121	298

Source: CAPCOA 2022.

Notes: CH_4 = methane; CO_2 = carbon dioxide; GWP = global warming potential; N_2O = nitrous oxide

[2] The Montreal Protocol is an international treaty that was approved on January 1, 1989, and was designated to protect the O_3 layer by phasing out the production of several groups of halogenated hydrocarbons that are believed to be responsible for O_3 depletion and are also potent GHGs.

[3] A metric ton is equal to approximately 1.1 tons.

[1] CO_2 has a variable atmospheric lifetime and cannot be readily approximated as a single number.

[2] The warming effects over a 100-year period relative to other GHGs.

4.7.3.3 Emissions and Inventories

Global Emissions

Worldwide anthropogenic GHG emissions in 2010 were approximately 49,000 million metric tons (MMT) of CO_2e, including ongoing emissions from industrial and agricultural sources and emissions from land use changes (e.g., deforestation, biomass decay). CO_2 emissions from fossil fuel use and industrial processes account for 65 percent of the total emissions of 49,000 MMT CO_2e (which include land use changes), and CO_2 emissions account for 77 percent of total GHG emissions. CH_4 emissions account for 16 percent of total GHG emissions, and N_2O emissions account for 6 percent of total GHG emissions (IPCC 2014).

United States Emissions

In 2022, the United States emitted approximately 6.3 billion MT CO_2e. Total U.S. emissions increased by 1 percent from 2021 to 2022, but are 17 percent below 2005 levels. A contributor to the increase in total GHG emissions between 2021 and 2022 was an increase in fossil fuel consumption, due in part to the rebound in economic activity after the height of the COVID-19 pandemic (USEPA 2025e).

State of California Emissions

The California Air Resources Board (CARB) is responsible for developing the State GHG Emission Inventory. This inventory estimates the amount of GHGs emitted to and removed from the atmosphere by human activities in the State of California and supports the AB 32 Climate Change Program. CARB's current GHG emission inventory is based on fuel use, equipment activity, industrial processes, and other relevant data (e.g., housing, landfill activity, and agricultural lands).

According to CARB emission inventory estimates, the State of California emitted approximately 371.1 MMT CO_2e emissions in 2022. This is a decrease of 9.3 MMT CO_2e from 2021. Since the peak level in 2004, the State of California's GHG emissions have generally followed a decreasing trend. CARB estimates that transportation was the source of approximately 38 percent of the State of California's GHG emissions in 2022, followed by industrial sources at 20 percent and electricity generation at 16 percent. The largest emissions category in the transportation sector is On-Road Transportation, which consists of passenger vehicles (cars, motorcycles, and light-duty trucks) and heavy-duty vehicles. The remaining sources of GHG emissions were residential and commercial activities at 11 percent, agriculture at 8 percent, and the remaining emissions from refrigerants, solid waste, and other sources (CARB 2024).

4.7.4 Method of Analysis

In May 2023 the California Air Pollution Control Officers Association (CAPCOA) in conjunction with other California air districts, including SCAQMD, released the latest version of CalEEMod version 2022.1.1.33. The purpose of this model is to calculate construction-source and operational-source criteria air pollutants and GHG emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures. Accordingly, the latest version of CalEEMod has been used for this Project to determine GHG emissions. Output from the model runs for construction and operational activity are provided in Attachment 2 of Appendix B. CalEEMod includes GHG emissions from the following source categories: construction, area, energy, mobile, waste, water, and refrigerants.

4.7.4.1 Construction Emissions

Construction of the Project is anticipated to occur over an approximately 12-month period. The construction schedule used in the analysis represents a reasonable estimate of the anticipated construction program and includes demolition, site preparation, grading, trenching, building construction (foundation, vertical, and mechanical/electrical/plumbing phases), paving, and architectural coating activities. The construction schedule and associated equipment fleet were modeled using CalEEMod version 2022.1.1.33 and are consistent with CEQA Guidelines requirements for evaluating construction-related GHG emissions.

A summary of construction equipment assumptions is provided in the CalEEMod output and the MIG Technical Air Quality Memorandum (Appendix B). Construction equipment anticipated for the Project includes excavators, dozers, loaders, water trucks, backhoes, dump trucks, concrete pumps, telehandlers, lifts, paving equipment, rollers, and cement and mortar mixers. Consistent with CalEEMod methodology and standard construction practices, equipment operating hours were based on typical daily activity levels for each construction phase. Construction-related GHG emissions were calculated based on fuel consumption associated with construction equipment, haul trucks, vendor trips, and worker commute trips throughout the construction period.

4.7.4.2 Construction Emissions

Construction of the Project is anticipated to occur over an approximately 12-month period. The construction schedule used in the analysis represents a reasonable estimate of the anticipated construction program and includes demolition, site preparation, grading, trenching, building construction (foundation, vertical, and mechanical/electrical/plumbing phases), paving, and architectural coating activities. The construction schedule and associated equipment fleet were modeled using CalEEMod version 2022.1.1.33 and are consistent with CEQA Guidelines requirements for evaluating construction-related GHG emissions.

4.7.4.3 Operational Emissions

Operation of the Project would result in GHG emissions in the form of carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and refrigerants. Operational emissions would be generated from several sources associated with the long-term operation of the proposed 70-room boutique hotel, restaurant, event space, and ancillary visitor-serving uses.

Primary sources of operational GHG emissions include area sources, energy consumption, mobile sources, water conveyance and treatment, solid waste generation, landscaping activities, and refrigerant leakage. Area-source emissions include the use of consumer products, architectural coatings, and landscape maintenance equipment. Energy source emissions are associated with electricity and natural gas consumption for building operations, lighting, heating and cooling, water heating, and related uses. Mobile source emissions are generated by vehicle trips associated with hotel guests, employees, restaurant and event patrons, service vehicles, and deliveries.

Additional GHG emissions would result from the conveyance and treatment of potable water and wastewater, the transportation and disposal of solid waste, and refrigerant leakage from heating, ventilation, air conditioning, and other cooling equipment. Collectively, these sources represent the primary operational contributors to the Project's annual GHG emissions inventory.

4.7.5 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, the Project would have a significant impact on GHG emissions if it would:

- **Threshold GHG-a:** Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- **Threshold GHG-b:** Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The City of San Juan Capistrano has not adopted its own numeric threshold of significance for determining impacts with respect to GHG emissions. A screening threshold of 3,000 MT CO_2e/yr to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the City of San Juan Capistrano and numerous cities in the South Coast Air Basin and is based on the SCAQMD staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold"). The SCAQMD Interim GHG Threshold identifies a screening threshold to determine whether additional analysis is required.

As noted by the SCAQMD:

> "…the…screening level for stationary sources is based on an emission capture rate of 90% for all new or modified projects...the policy objective of [SCAQMD's] recommended

> interim GHG significance threshold proposal is to achieve an emission capture rate of 90% of all new or modified stationary source projects. A GHG significance threshold based on a 90% emission capture rate may be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, a 90% emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. This assertion is based on the fact that [SCAQMD] staff estimates that these GHG emissions would account for slightly less than 1% of future 2050 statewide GHG emissions target (85 [MMTCO_2e/yr]). In addition, these small projects may be subject to future applicable GHG control regulations that would further reduce their overall future contribution to the statewide GHG inventory. Finally, these small sources are already subject to [best available control technology] (BACT) for criteria air pollutants and are more likely to be single-permit facilities, so they are more likely to have few opportunities readily available to reduce GHG emissions from other parts of their facility."

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 MT CO_2e/yr, the project is considered a small project and is not considered a substantial GHG emitter, and therefore the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 MT CO_2e/yr, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. As previously discussed, a screening threshold of 3,000 MT CO_2e/yr is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this Project.

4.7.6 Plans, Programs, and Policies

Compliance measures are uniformly applied regulations or requirements imposed by the approving agency based on the type of action proposed. Because these measures are standard requirements, they are not considered mitigation measures. The following existing plans, programs, and policies (PPPs) apply to development allowed under the Project and help reduce or avoid potential impacts related to GHG emissions:

PPP GHG-1 New buildings are required to achieve the California Building Energy Efficiency Standards (Title 24, Part 6) and California Green Building Standards Code (CALGreen) (Title 24, Part 11) in effect at the time of permit application for plan check. The 2025 Building Energy Efficiency Standards and the 2025 CALGreen became effective January 1, 2026. The Project would include solar photovoltaic

(PV) systems designed and installed in accordance with applicable code requirements. In addition, the Project would incorporate energy efficiency measures, where feasible, such as high-efficiency heating, ventilation, and air conditioning (HVAC) systems, LED lighting, energy recovery ventilation, and other strategies consistent with applicable code requirements and sustainability objectives.

PPP GHG-2 California's Green Building Standards Code (CALGreen) requires the recycling and/or salvaging for reuse at minimum of 65 percent of the nonhazardous construction and demolition waste generated during most "new construction" projects (CALGreen secs. 4.408 and 5.408). Consistent with CALGreen requirements and City Building Department review procedures, construction contractors are required to submit a construction waste management plan that identifies the construction and demolition waste materials to be diverted from disposal by recycling, reused on the project, or salvaged for future use or sale and the amount (by weight or volume).

PPP GHG-3 Construction activities are required to adhere to Title 13 California Code of Regulations Section 2499, which requires that nonessential idling of construction equipment is restricted to five consecutive minutes or less.

4.7.7 Environmental Impacts

The following sections address various potential impacts relating to GHG emissions that could result from implementation of the Project.

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

Impact Analysis

The Project would generate GHG emissions during construction and operation, as discussed below.

Construction

Construction activities associated with the Project would result in short-term GHG emissions from heavy equipment and construction worker vehicles. The Project includes rehabilitation and adaptive reuse of the historical Domingo Yorba Adobe and Casa Manuel Garcia Adobe, demolition of the existing barn structure and select non-historical additions, and construction of a new 70-room boutique hotel, restaurant, event facilities, parking structure, and associated site improvements. Construction would occur over a 12-month period in a series of phases including demolition, site preparation, grading, trenching, building construction, paving, and architectural coating activities. Project construction emissions were estimated using CalEEMod, version

2022.1.1.33 based on the anticipated construction schedule and equipment fleet for each construction phase.

Total construction GHG emissions for the Project would be 250 MT/CO_2e per year. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year Project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions, as shown in Table 4.7-2, Project Annual GHG Emissions, below.

Operation

During operation, the Project would result in area and indirect emissions from electricity and natural gas consumption, water and wastewater transport, solid waste generation and mobile source emissions from motor vehicle trips. These emission sources were also quantified using CalEEMod based on project-specific land use assumptions and default emission factors. Annual operational emissions are shown in Table 4.7-2.

As shown in Table 4.7-2, construction and operation of the Project would generate 765.6 MT CO_2e per year and would not exceed the SCAQMD screening threshold of 3,000 MT CO_2e/yr. Thus, the Project would not generate significant GHG emissions, and impacts would be less than significant.

Table 4.7-2. Project Annual GHG Emissions

Source	Emissions (MT CO_2e)
Area	1.1
Energy	185
Mobile	522
Waste	13
Water	4.2
Refrigerants	14
Landscaping	18
Amortized Construction Emissions	8.3
Total Annual Emissions	**765.6**
SCAQMD Threshold	***3,000***
Exceeds Threshold?	**No**

Source: MIG Technical Air Quality Memorandum (Appendix B)

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

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

Impact Analysis

As previously stated, pursuant to Section 15064.4 of the CEQA Guidelines, a lead agency may rely on qualitative analysis or performance-based standards to determine the significance of GHG emissions impacts. Accordingly, the Project's consistency with the California Air Resources Board's 2022 Scoping Plan and SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), known as Connect SoCal, is evaluated below. Consistency with the 2022 Scoping Plan also demonstrates consistency with Assembly Bill 32 (AB 32) and Senate Bill 32 (SB 32), as the Scoping Plan was prepared to implement the State of California's legislatively adopted GHG reduction targets. Consistency with earlier Scoping Plans is not necessary because those plans have been superseded by the 2022 Scoping Plan. Likewise, the remaining plans, policies, executive orders, and GHG reduction targets discussed in Section 4.7.2, Regulatory Setting, are reflected in and advanced through implementation of the 2022 Scoping Plan and Connect SoCal. For reasons outlined herein, the Project would result in a less than significant impact with respect to GHG emissions.

2022 CARB Scoping Plan Consistency

The 2022 Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The 2022 Scoping Plan sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions to 85 percent below 1990 levels by 2045 in accordance with AB 1279. The 2022 Scoping Plan intends to achieve the AB 1279 targets primarily through zero-emission transportation (e.g., electrifying cars, buses, trains, and trucks). Additional GHG reductions are achieved through decarbonizing the electricity and industrial sectors. However, the 2022 Scoping Plan is not directly applicable to specific projects.

Development of the Project is required to adhere to the programs and regulations identified by the 2022 Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 1279. Appendix D, Local Actions, of the 2022 Scoping Plan outlines priority GHG reduction strategies to be implemented through local projects. These strategies are not mandates for new development; however, these strategies represent the most applicable tool for evaluating project consistency with the 2022 Scoping Plan.

As shown in Table 4.7-2, the majority of the GHG emissions associated with the Project would be attributed to mobile and energy sources. These emissions would decline in the future due to statewide measures, as well as cleaner technology, more efficient emissions standards, and retirement of older vehicles from the road. However, emissions standards are set at the federal and state levels, and the City has little control over vehicle emissions. As such, Appendix D of the

2022 Scoping Plan prioritizes transportation electrification and VMT reduction by converting fleet vehicles to zero-emission vehicles, reducing minimum parking standards, implementing complete streets policies, increasing access to public transit, and encouraging transit-oriented infill development. As discussed in Section 4.10, Transportation, implementation of the Project would not result in a significant increase in VMT. In addition, future projects would be required to comply with CALGreen as it relates to EV parking requirements.

Regarding energy, Appendix D of the Scoping Plan also prioritizes building decarbonization through the adoption of ordinances that require all-electric new construction, implementing energy efficiency retrofits or replacements for existing buildings, deploying renewable energy production and energy storage in new public projects and on existing public facilities, and including all-electric appliances in new construction beginning in 2026 for residential and 2029 for commercial land uses. Although these actions are encouraged in the 2022 Scoping Plan, AB 130 was recently adopted and limits local jurisdictions' ability to adopt reach codes, including those that would require all-electric development. However, new buildings constructed under the Project would continue to be required to meet the current CALGreen and Building Energy Efficiency Standards, including energy-efficient design and installation of solar panels for renewable energy production. The Project would include solar photovoltaic (PV) systems designed and installed in accordance with applicable code requirements. In addition, the Project would incorporate energy efficiency measures, where feasible, such as high-efficiency heating, ventilation, and air conditioning (HVAC) systems, LED lighting, energy recovery ventilation, and other strategies consistent with applicable code requirements and sustainability objectives. Additionally, the Project does not include any components that would preclude or interfere with future project applicant participation in programs to facilitate electrification, such as the California Electric Homes Program that provides incentives for new all-electric home construction (CEC 2025).

Several of the State of California's plans and policies, as described above in Section 4.7.2, would contribute to a reduction in mobile and energy source emissions associated with implementation of the Project, including vehicle emissions standards and the renewable portfolio standard. As described above, the Project would not obstruct implementation of the CARB Scoping Plan, and impacts would be less than significant.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), known as Connect SoCal, promotes land use patterns that support reduced vehicle travel, increased transit use, active transportation opportunities, and efficient use of existing infrastructure. The RTP/SCS emphasizes concentrating development within existing urbanized areas, particularly in locations with access to transit, employment centers, commercial services, and multimodal transportation networks. By integrating land use and transportation planning, Connect SoCal seeks

to reduce per capita GHG emissions from passenger vehicles and help the region achieve state-mandated GHG reduction targets.

The Project consists of the adaptive reuse and rehabilitation of the historic Domingo Yorba Adobe and Casa Manuel Garcia Adobe, demolition of non-historical structures and additions, and development of a 70-room boutique hotel with associated restaurant, event, and visitor-serving uses on a previously developed 1.68-acre site in the Historic Town Center of San Juan Capistrano. The Project Site is located within walking distance of the San Juan Capistrano Metrolink and Amtrak Station and is surrounded by existing commercial, civic, cultural, and visitor-serving destinations.

The Project would concentrate visitor-serving uses in an established urban area served by existing infrastructure and transportation facilities rather than inducing development on undeveloped land at the urban fringe. By promoting infill redevelopment, adaptive reuse of historical resources, walkability, and access to transit, the Project is consistent with the land use and transportation objectives of Connect SoCal. Accordingly, the Project would not conflict with SCAG's RTP/SCS and impacts would be less than significant.

Level of Significance Before Mitigation: Less than significant.

Mitigation Measures: No mitigation measures are required.

4.7.8 Cumulative Impacts

GHG emissions are inherently cumulative because the environmental effects of climate change result from the incremental accumulation of emissions on a regional and global scale rather than from a single project alone. Therefore, a project's contribution to cumulative climate change impacts is evaluated by determining whether the project would generate GHG emissions that exceed an applicable significance threshold or conflict with applicable plans, policies, or regulations adopted to reduce GHG emissions.

The following sections address various potential cumulative impacts relating to GHG emissions that could result from implementation of the Project.

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

As discussed above, the Project would generate approximately 765.6 metric tons of carbon dioxide equivalent (MT CO_2e) per year during construction and operation, including amortized construction emissions. This level of emissions is substantially below the South Coast Air Quality Management District's recommended screening threshold of 3,000 MT CO_2e per year. The Project would also be required to comply with applicable state regulations aimed at reducing GHG emissions, including the California Building Code energy efficiency requirements, California

Green Building Standards Code (CALGreen), Advanced Clean Cars regulations, Renewable Portfolio Standard requirements, and other statewide measures intended to achieve California's GHG reduction targets.

Because the Project's GHG emissions would be below the applicable significance threshold and would not conflict with state or regional GHG reduction strategies, the Project would not make a cumulatively considerable contribution to global climate change. Therefore, the Project's cumulative GHG impact would be less than significant.

4.7.8.2 Cumulative Threshold GHG-b: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Similar to the above Cumulative Threshold GHG-a, geographic scope of consideration for GHG emissions as it pertains to consistency with an applicable plan, is also on a global scale. GHG reduction plans, policies, and regulations, including the California Air Resources Board's 2022 Scoping Plan and SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), are intended to address the cumulative effects of GHG emissions at the local, regional, and statewide levels. Therefore, a project's consistency with these plans is an indicator of whether it would contribute to a cumulative conflict with statewide GHG reduction efforts.

As discussed under Threshold GHG-b, the Project would not conflict with the greenhouse gas reduction strategies contained in the 2022 Scoping Plan or Connect SoCal. The Project would redevelop a previously developed infill site in San Juan Capistrano's Historic Town Center, support walkability and transit accessibility, comply with applicable energy efficiency requirements, and generate GHG emissions substantially below the SCAQMD's recommended screening threshold. In addition, the Project would be subject to the numerous state regulations and programs that collectively implement California's GHG reduction goals.

Because the Project is consistent with applicable GHG reduction plans, policies, and regulations, it would not make a cumulatively considerable contribution to a cumulative conflict with efforts to reduce GHG emissions. Therefore, cumulative impacts would be less than significant.

4.7.9 Level of Significance Before Mitigation

Environmental impacts related to Thresholds GHG-a and GHG-b would be less than significant.

4.7.10 Mitigation Measures

No mitigation measures are required.

4.7.11 Level of Significance After Mitigation

Not applicable.