

William Lamborn
Major Projects
Department of City Planning
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Phone: 213.978.1470

Dear Mr. Lamborn,

In preparation for the City Council Hearing on the 4051 South Alameda Street Project (Project), Sapphos Environmental Inc. has prepared an updated overview of applicable greenhouse gas (GHG) related plans, policies, and regulations pertinent to the Project. The Project's Notice of Preparation (NOP) was initially released on June 10, 2014, and then recirculated on June 17, 2014, to provide the Site Plan, Plot Plan, Vicinity Map, and 500-foot Radius Map. Typically, projects evaluated under CEQA are required to consider any plans, policies, and regulations published prior to the NOP date. In light of the Appeals filed, the City is considering GHG-related plans, policies, and regulations published since June 17, 2014. Applicable GHG-related documents have been published on the state, regional, and local level.

State:

- Executive Order B-30-15 (April 29, 2015)
 - Governor Brown Jr. issued EO-B-30-15 to set a California GHG emissions target for 2030 at 40 percent below 1990 levels.
- SB 32 California Global Warming Solutions Act of 2006: emissions limit (September 8, 2016)
 - SB 32 sets the State Air Resources Board as the responsible agency to reduce statewide greenhouse gas emissions to 40 percent below 1990 levels by 2030.
- The 2017 Climate Change Scoping Plan Update (January 20, 2017)
 - The 2017 Climate Change Scoping Plan Update (Plan) establishes a framework for California to reduce greenhouse gases by 40 percent below 1990 levels by 2030. Continuing the efforts made since 2006 under AB 32, the Plan focuses on programs including Cap-and-Trade Regulation, Low Carbon Fuel Standard, cleaner cars, trucks, and freight movement, renewable energy, and reducing methane emissions from agriculture and waste. While AB 32 justified the State's climate action until 2020, SB 32 extends those actions until 2030.

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- SB 350 Clean Energy and Pollution Reduction Act (October 7, 2015)
 - SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. SB 350 also doubles the statewide energy efficiency savings in electricity and natural gas end uses by 2030.
- 2016 California Building Standards Code, Title 24, Part 11 (CalGreen)
 - Effective January 1, 2017, approximately 6 percent of parking spaces in new non-residential parking lots must have infrastructure to support the future installation of electric vehicle charging stations. Compared to the 2013 CalGreen, the percent of parking spaces to support electric vehicle charging stations increased from 3 percent to 6 percent and the parking lot threshold size decreased from 51 spaces to 10 spaces.

Regional:

- Southern California Association of Governments Regional Transportation Plan / Sustainable Communities Strategy (SCAG RTP/SCS) (April 2016)
 - Pursuant to SB 375, the SCAG region has to meet per capita GHG reduction targets from cars and light duty trucks of 8 percent by 2020 and 13 percent by 2035. The SCAG RTP/SCS demonstrates that the SCAG region would achieve and even exceed these targets by reducing 8 percent by 2020, 18 percent by 2035, and 22 percent by 2040.

City:

- Los Angeles Climate Action Report: Updated 1990 Baseline and 2013 Emissions Inventory Summary (pLAN) (April 8, 2015)
 - pLAN establishes the framework to reduce Los Angeles' GHG emissions by 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050 compared to 1990 levels. These reductions will be achieved through creating a pathway to 50 percent renewable energy, increasing local solar energy, reducing transportation emission through cleaner fuels and transit, improving recycling and waste diversion, and reducing reliance on imported water.

GHG Impacts in Relation to Conflicts with Adopted Plans or Policies

State and local legislators have taken an aggressive stance in combatting climate change. The Project is thus evaluated for consistency with these new GHG-related documents. The Project consists of four industrial buildings that would be built in compliance with the Los Angeles Green Building Code. The Los Angeles Green Building Code is based upon the State's CalGreen so the Project would need to consider compliance with the 2016 electric vehicle standards in non-residential parking lots. Furthermore, the proposed project consolidates multiple operations into a centralized location along the Alameda Corridor, which has immediate access to rail lines and major interstates and highways, thereby reducing mobile emissions. As a result, the Project is found to be consistent with these recent GHG-related plans, policies, and regulations as it would not hinder achievement of any of the established GHG reduction targets.

Executive Order B-30-15

In 2014, transportation contributed to 34 percent of GHG emissions in California. As EO B-30-15 looks to reduce GHG emissions, reducing emissions from transportation plays a critical role in achieving this goal. As described in Section III.C, *Project Objectives*, of the Draft EIR, one of the Project objectives is to provide opportunities for the Project's labor force to use existing public transit and other multi-modal transportation. The Project would also place manufacturing jobs in close proximity to where workers live and has a local hire agreement that provides for 20 percent of all hours worked in construction at the site to be performed by Local Residents (Local Hire Goal). Preference will be given to Local Residents in the following order: (i) those living within one mile of the proposed project site; (ii) those living in the Community Employment Area; and (iii) all other City of Los Angeles residents who reside in a census tract with high unemployment rates (Section III, *Project Description*, of the Draft EIR). Furthermore, the proposed project site is located along the 20-mile Alameda Corridor that links the ports of Long Beach and Los Angeles to the transcontinental rail network near downtown Los Angeles. Through the implementation of the local hire agreement and the location of the proposed project along the Alameda Corridor, the proposed project would be consistent with the CTP, RTP, policies and goals outlined in the City's General Plan, and the Southeast Los Angeles Community Plan, particularly by reducing vehicle miles traveled (VMT) for employees, preserving the Alameda Corridor, promoting transit-oriented development growth, and reducing GHG emissions through public transit and alternative modes of transportation. The proposed project is also adjacent to the Blue Line and other transit facilities, which would further reduce employee VMT (Section IV.G, *Traffic*, of the Draft EIR). Additionally, Mitigation Measure MM-Air-4 provides for a TDM program which would include such provisions as:

- Providing employees with a bulletin board, display case, or kiosk (displaying transportation information) where the greatest number of employees are likely to see it.
- Provision of a designated parking area for employee carpools and vanpools as close as practical to the main pedestrian entrance(s) of the building(s). This area shall include at least 10 percent of the parking spaces required for the site.
- Provision of one permanent, clearly identified (signed and striped) carpool/vanpool parking space for the first 50,000 to 100,000 square feet of gross floor area and one additional permanent, clearly identified (signed and striped) carpool/vanpool parking space for any development over 100,000 square feet of gross floor area.
- Provision of parking spaces clearly identified (signed and striped) that shall be provided in the designated carpool/vanpool parking area at any time during the building's occupancy sufficient to meet employee demand for such spaces.
- Provision of a statement that preferential carpool/vanpool spaces are available on-site and a description of the method for obtaining permission to use such spaces shall be included on the required transportation information board.
- The provision of bicycle parking that shall be provided in conformance with Section 12.21A16 of this Code.

- The provision of a safe and convenient area in which carpool/vanpool vehicles may load and unload passengers other than in their assigned parking area;
- The provision of sidewalks or other designated pathways following direct and safe routes from the external pedestrian circulation system to each building in the development.
- If determined necessary by the City to mitigate the project impact, bus stop improvements shall be provided. The City will consult with the local bus service providers in determining appropriate improvements. When locating bus stops and/or planning building entrances, entrances shall be designed to provide safe and efficient access to nearby transit stations/stops.
- The provision of safe and convenient access from the external circulation system to bicycle parking facilities on-site.

The Project additionally analyzed alternatives that would lessen the environmental impact including Alternative B: Use of Clean Fuel Trucks and Alternative C: Reduced Truck Operations. For Alternative B, clean fuel trucks would be used for up to 40 percent of the truck trips, which would achieve a 10 percent reduction in criteria air pollutant emissions. For Alternative C, the reduced truck operations would cap the maximum allowable truck trips at 75 trips per day. This would reduce the cancer risk from diesel emissions by 78 percent and reduce peak period air emissions by 25 percent (Section VI, *Alternatives*, of the Draft EIR).

SB 32

SB 32 codifies the GHG reduction target from EO B-30-15 of reaching 40 percent below 1990 levels. Therefore, the Project objective to increase transit use and the local hire agreement would support achievement of this target.

2017 Climate Change Scoping Plan Update

As the 2017 Climate Change Scoping Plan Update explains how to achieve the GHG reduction target from EO B-30-15 and SB 32, the Project is consistent with the strategies laid out in the 2017 Climate Change Scoping Plan. As stated in the Scoping Plan, CARB encourages local governments to adopt a reduction goal for municipal operations emissions and move toward establishing similar goals for community emissions that parallel the State's commitment to reduce GHG emissions by approximately 15 percent from current levels by 2020. The City of Los Angeles adopted the Green LA plan, which committed Los Angeles to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels (Section IV.D, *Greenhouse Gas Emissions*, of the Draft EIR). In accordance with the City's goals, the Project would follow the Los Angeles Green Building Code which would mandate the Project to provide electric vehicle supply wiring, exceed California Energy Code requirements for energy efficiency, use Energy Star equipment and appliances, prewire for a future electrical solar system, install plumbing fixtures to save potable water, and require recycling by the building occupants. In addition, the number of diesel trucks serving the Project is projected to be no more than 31 per day, which would result in a less than significant human health risk from diesel emissions (Section IV.B, *Air Quality*, of the Draft EIR).

These project design features would support of the 2017 Climate Change Scoping Plan Update's strategies for GHG reduction.

Additionally, the DEIR evaluated consistency with applicable plans on page IV.D-11, and the project would now be required to comply with the newer version of the LAGBC, which includes the following relevant provisions:

- 99.05.106.5.3.1. Electric Vehicle Supply Wiring. Provide a minimum number of 208/240 V 40 amp, ground AC outlet(s), that is equal to 5 percent of the total number of parking spaces, rounded up to the next whole number. The outlet(s) shall be located in the parking area.
- 99.05.203.1.3. Energy Efficiency. Exceed California Energy Code requirements, based on the 2008 Energy Efficiency Standards, by 15 percent.
- 99.05.210.1. ENERGY STAR Equipment and Appliances. Residential grade equipment and appliances provided and installed shall be ENERGY STAR labeled if ENERGY STAR is applicable to the equipment or appliance.
- 99.05.211.4. Prewiring for Future Electrical Solar System: Install conduit from building roof, eave, or other locations approved by the Department to the electrical service equipment. The conduit shall be labeled as per the Los Angeles Fire Department requirements.
- 99.05.303.2 Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture, and fittings as required by the California Building Standards Code.
- 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics and metals.

Through implementation of mandatory measures outlined in the LAGBC, the proposed project would be consistent with AB 32, the SCAG RCP, the City of Los Angeles General Plan, and the Los Angeles Climate Action Plan.

SB 350 Clean Energy and Pollution Reduction Act

The Project is served by Los Angeles Department of Water & Power (LADWP). LADWP has established a GHG reduction strategy to achieve the 50 percent renewable energy procurement by 2030 in their 2016 Integrated Resource Plan, published on December 2016. The Integrated Resource Plan sets a goal of 55 percent Renewable Portfolio Standard (RPS) by 2030 and 65 percent RPS by 2036. This would exceed the SB 350 requirements. LADWP plans to reach these GHG reduction goals by early coal divestment, local solar, improved energy storage, improved energy efficiency, and transportation electrification.

2016 California Building Standards Code, Title 24, Part 11 (CalGreen)

In accordance with the LAGBC, the project would provide electric vehicle supply wiring, exceed California Energy Code requirements for energy efficiency, use Energy Star equipment and appliances, prewire for a future electrical solar system, install plumbing fixtures to save potable water, and require recycling by the building occupants.

Southern California Association of Governments Regional Transportation Plan / Sustainable Communities Strategy (SCAG RTP/SCS)

The Project would place manufacturing jobs in close proximity to where workers live and has a local hire agreement that provides for 10 percent of new employees to be hired from within one mile of the project site (Section IV.G, *Traffic*, of the Draft EIR). The Project would reduce traffic congestion impacts by enabling employees to utilize other modes of transportation including public transit, carpooling, bike riding, and walking. The Project additionally analyzed transportation-related alternatives that would lessen the environmental impact including Alternative B: Use of Clean Fuel Trucks and Alternative C: Reduced Truck Operations. The project design features with consideration to traffic as well as the adherence to the LAGBC are consistent with the goals in the SCAG RTP/SCS as it would reduce GHG emissions from cars and light trucks.

Los Angeles Climate Action Report: Updated 1990 Baseline and 2013 Emissions Inventory Summary (pLAN)

LADWP is the main utility service provider in Los Angeles and the service provider for this Project. LADWP has established a GHG reduction strategy to achieve the 50 percent renewable energy procurement by 2030 in their 2016 Integrated Resource Plan, published on December 2016. The Integrated Resource Plan sets a goal 55 percent Renewable Portfolio Standard (RPS) by 2030 and 65 percent RPS by 2036. These efforts by LADWP are in support of the pLAN. In addition, as discussed in more detail above, the Applicant would design for energy efficiency in accordance with green building code and TDM requirements, reduce water and waste, implement a local hire agreement, and provide transit incentives for the project, which is located in close proximity to transit, which are all in support of the pLAN's goals.

Although not required to evaluate goals and policies adopted after publication of the Notice of Preparation, the EIR has considered and met the goals and objectives of the key federal, state, regional, and local goals and policies adopted during preparation of the EIR and circulation for public review.

Sincerely,

SAPPHOS ENVIRONMENTAL, INC.



Eric Charlton