

5.7 Greenhouse Gases

5.7.1 Environmental Setting

Gases that trap heat in the atmosphere (i.e., greenhouse gases [GHGs]) regulate the earth’s temperature and produce the GHG effect, which is responsible for maintaining a habitable climate. The most common GHGs are carbon dioxide (CO₂) and water vapor. Other important GHGs include methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). GHGs are released into the earth’s atmosphere through a variety of natural processes and human activities.

Primary GHG emission sources are listed in Table 5.7-1.

Table 5.7-1 Greenhouse Gas Emissions Sources

Source Category	Example Activity/Source	GHG
Energy	Electricity generation	CO ₂
	Transportation	N ₂ O, CH ₄
Industry	Refrigeration and cooling	HFCs
	Semi-conductor manufacturing	PFCs
	Substations	SF ₆
Agriculture	Crop fertilization	N ₂ O
	Livestock	CH ₄
Waste	Landfill	CH ₄

The potential of a GHG to trap heat in the atmosphere is known as global warming potential (GWP). Each GHG has its own potency and effect upon the earth’s energy balance, expressed in terms of its warming potential. The U.S. Environmental Protection Agency (EPA) defines GWP as “a measure of the total energy that a gas absorbs over a particular period of time (usually 100 years), compared to carbon dioxide” (EPA 2018). The reference gas for global warming potential is CO₂ and is assigned a GWP value of one. In contrast, because it is orders of magnitude stronger in trapping heat in the atmosphere than CO₂, SF₆ has a GWP value of 23,500. In GHG emissions inventories, the weight of each gas is multiplied by its GWP and is measured in units of equivalent CO₂ (CO₂e). Table 5.7-2 shows the GWP for the six GHGs previously mentioned.

Table 5.7-2 Greenhouse Gases and Global Warming Potential

Greenhouse Gas	Warming Potential ^(a)
Carbon Dioxide (CO ₂)	1
Methane (CH ₄)	25
Nitrous Oxide (N ₂ O)	298
Perfluorocarbons (PFCs) ^(b)	7,390–12,200
Hydrofluorocarbons (HFCs) ^(b)	92–14,800
Sulfur Hexafluoride (SF ₆) ^(b)	22,800

Source: EPA 2016

Notes:

^(a) Potential is expressed relative to that of carbon dioxide (CO₂) over a period of 100 years.

^(b) High global warming potentials include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆)

1 Scientific research has established a link between the amount of GHGs in the atmosphere and observed
2 changes of the earth’s climate. An expanding body of scientific research supports the theory that global
3 climate change is currently affecting weather patterns, average sea level, ocean acidification, chemical
4 reaction rates and precipitation rates. GHGs have direct and indirect effects on mean temperature,
5 precipitation, ocean currents, wind patterns, and storm activity. The anthropogenic GHGs that are emitted
6 in the greatest quantities are CO₂ and CH₄. Emissions of CO₂ are largely byproducts of fossil fuel
7 combustion, whereas CH₄ results mostly from off-gassing associated with agricultural practices and
8 landfills. Regulatory efforts to manage the anthropogenic drivers of global climate change focus on six
9 primary GHGs.

10
11 In 2014, the United States was the world’s second largest contributor to GHG emissions (WRI 2018), and
12 California was the second largest contributor to GHG emissions in the United States (WRI 2018). The
13 California Air Resources Board (CARB) compiles the California Greenhouse Gas Emission Inventory,
14 which tracks statewide anthropogenic GHG emissions. The inventory provides estimates of anthropogenic
15 GHG emissions within California, as well as emissions associated with imported electricity; natural
16 sources are not included in the inventory. The inventory includes estimates for CO₂, CH₄, N₂O, SF₆,
17 HFCs, and PFCs and covers the years 2000 through 2015.

18
19 Data sources from California and federal agencies, international organizations, and industry associations
20 are used to calculate this GHG inventory. As illustrated in Table 5.7-3, the transportation sector accounts
21 for the largest source of GHG emissions in the state, followed by industry and electricity generation
22 sector contributions (CARB 2017). Also note that over the 15-year period, the state’s gross GHG
23 emissions declined by about 6 percent relative to the year 2000 baseline, while the state’s population
24 during that same period increased by 14 percent (from 33.9 million in 2000 to 39.03 million in 2015).

25
Table 5.7-3 California Greenhouse Gas Inventory for years 2000 and 2015

Source Category	2000 (million MTCO ₂ e)	2015 (million MTCO ₂ e)
Transportation	176.49	164.63
Industrial	96.24	91.71
Electric Power	104.84	83.67
Commercial and Residential	43.18	37.92
Agriculture	31.95	34.65
High GWP ^(a)	7.14	19.05
Recycling and Waste	7.35	8.73
Gross California GHG Emissions	467.19	440.36

Source: CARB 2017

Note:

^(a) High global warming potentials; includes hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride (NF₃)

Key:

GHG = greenhouse gas

GWP = global warming potential

MTCO₂e = million metric tons of carbon dioxide equivalent

5.7.2 Regulatory Setting

5.7.2.1 Federal

Clean Air Act

In 2009, the EPA issued two separate findings regarding GHGs under Section 202(a) of the Clean Air Act:

- **Endangerment Finding:** states that the current and projected concentrations of the six key GHGs (CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆) in the atmosphere threaten public health and welfare of current and future generations.
- **Cause or Contribute Finding:** states that the combined emissions of GHGs from new motor vehicles and new motor vehicle engines contribute to GHG pollution that threatens public health and welfare.

These findings were a foundation for the EPA's regulation of vehicle GHG emissions. The EPA and the U.S. Department of Transportation's National Highway Traffic and Safety Administration (NHTSA) have finalized GHG emission reduction regulations for light-duty vehicles and heavy-duty engines (EPA 2015**6b**).

Final Rule on Mandatory Reporting of GHGs (40 CFR Part 98)

In 2009, the EPA established the Final Rule on Mandatory Reporting of Greenhouse Gases, which requires reporting of GHG emissions from large sources and suppliers in the United States. The rule intends to collect accurate and timely emissions data to inform future policy decisions. Facilities that emit 25,000 metric tons of CO₂e (MTCO₂e) or more per year are required to submit annual reports to the EPA.

Light-Duty Vehicle Standards

In collaboration with the NHTSA, the EPA finalized the program to reduce GHG emissions and improve fuel economy for light-duty vehicles (model years [MY] 2012 to 2016) in May 2010. The program was extended in 2012 to set more stringent standards for MY 2017 to 2025 light-duty vehicles. The revised standards are projected to reduce GHGs by approximately 2 billion metric tons and save 4 billion barrels of oil over the lifetime of MY 2017 to 2025 vehicles. Standards include fuel economy targets and improvements in vehicle technologies, including improved vehicle aerodynamics, reduced vehicle weight, lower tire rolling resistance, and expanded production of electric and hybrid vehicles.

Heavy-Duty Truck and Bus Standards

In 2011, the EPA and NHTSA announced the first-year program to reduce GHG emissions and improve the fuel efficiency of heavy-duty trucks and buses. The final combined standards of the program will reduce CO₂ emissions by about 270 million metric tons and save about 530 million barrels of oil over the life of MY 2014 to 2018 heavy-duty vehicles. The heavy-duty sector addressed in the EPA and NHTSA rules (including the largest pickup trucks and vans, semi-trucks, and all types and sizes of work trucks and buses in between) accounts for nearly 6 percent of total GHG emissions in the United States and for 20 percent of transportation emissions. The program includes standards for fuel consumption and emissions for combination tractors and vocational vehicles (i.e., vehicles equipped for a particular industry, trade or

1 occupation); N₂O and CH₄ emissions standards applicable to all heavy-duty engines, pick-ups, and vans;
2 and standards for leakage of HCF refrigerants from air conditioning systems.

4 **5.7.2.2 State**

6 **Assembly Bill 32 and Scoping Plan**

7 In 2006, the Global Warming Solutions Act, Assembly Bill (AB) 32, was enacted, requiring a reduction
8 of the state's GHG emissions to 1990 levels by 2020, consistent with EO S-3-05. AB-32 requires that
9 CARB prepare and approve a Climate Change Scoping Plan (Scoping Plan) for achieving the maximum
10 technologically feasible and cost-effective reductions in GHG emissions from sources or categories of
11 sources of GHGs by 2020. The Scoping Plan includes a range of GHG emission reduction actions,
12 including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives,
13 voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB-32 cost of
14 implementation fee regulation to fund the program. The initial Scoping Plan was approved at the CARB
15 hearing on December 12, 2008. CARB approved the First Update to the Scoping Plan in May 2014
16 (CARB 2014). In 2016, the Legislature passed SB32, which codifies a 2030 GHG emission reduction
17 target of 40 percent below 1990 levels. Measures in the scoping plan are being adopted over time as
18 regulations (CARB 2018).

19
20 GHG reduction measures contained in the Scoping Plan that are applicable to the proposed project
21 include the Low Carbon Fuel Standard, regional transportation-related GHG targets, light-duty vehicle
22 GHG standards, medium/heavy-duty vehicle GHG Standards, vehicle efficiency measures, goods
23 movement, energy efficiency, high GWP gases, and recycling and waste. The California legislature has
24 also passed legislation implementing most of the Climate Change Scoping Plan measures. Legislation
25 applicable to the proposed projects is described below.

27 **Executive Order B-30-15**

28 In April 2015, Governor Brown signed E.O. B-20-15 establishing a new interim statewide GHG emission
29 reduction target of 40 percent below 1990 levels by 2030. The interim reduction target was established to
30 ensure that California meets its goal of reducing GHG emissions to 80 percent below 1990 levels by
31 2050. E.O. B30-15 requires state agencies to consider climate change in planning and investment
32 decisions, giving priority to actions that reduce GHG emissions.

34 **Senate Bill 375 – Sustainable Communities Strategy**

35 In 2008, Senate Bill (SB) 375 was adopted to achieve the GHG reduction targets established in the
36 Climate Change Scoping Plan for the transportation sector through local land use decisions that affect
37 travel behavior. In its relevant part, SB 375 requires CARB to set regional targets for GHG emission
38 reductions from passenger vehicles and light duty trucks. On November 11, 2011, CARB accepted the
39 San Diego Association of Governments (SANDAG)—which includes San Diego County—determination
40 that its adopted Sustainable Communities Strategy would meet or exceed the regional GHG emissions
41 reduction goals of 7 percent by 2020 and 13 percent by 2035 (CARB 2011).

1 **Executive Order S-21-09**

2 E.O. S-21-09 was enacted on September 15, 2009. It requires that CARB, under its AB-32 authority,
3 adopt a regulation by July 31, 2010, that sets a 33 percent renewable energy target by 2020, as established
4 in E.O. S-14-08. Under E.O. S-21-09, CARB will work with the CPUC and Council on Environmental
5 Quality (CEQ) to encourage the creation and use of renewable energy sources, and will regulate all
6 California utilities. CARB will also consult with the California Independent System Operator (ISO) and
7 other load balancing authorities regarding impacts on reliability, renewable integration requirements, and
8 interactions with wholesale power markets in carrying out the provisions of the Executive Order. The
9 order requires CARB to give highest priority to resources that provide the greatest environmental benefits
10 with the least environmental costs and impacts on public health.

11
12 **Senate Bills 1078 and Executive Order S-14-08**

13 SB 1078 requires retail sellers of electricity to provide at least 20 percent of their supply from renewable
14 sources by 2017. In November 2008, Governor Schwarzenegger signed E.O. S-14-08, which expands the
15 Renewables Energy Standard to 33 percent by 2020. In April 2011, the California legislature enacted SB
16 X1-2, which mandates the Renewables Portfolio Standard of 33 percent by 2020 for investor-owned and
17 public owned utilities.

18
19 **5.7.2.3 Regional and Local**

20
21 The proposed project would not be subject to local discretionary regulations because the CPUC has
22 exclusive jurisdiction over the siting, design, and construction of the proposed project. However, the
23 following discussion of local regulations relating to GHG emissions is provided for informational
24 purposes. As explained in the following subsections, the construction, operation, and maintenance of the
25 proposed project would not conflict with any environmental plans, policies, or regulations adopted by
26 agencies with jurisdiction over local regulations related to GHG emissions.

27
28 **San Diego Association of Governments' 2014 Regional Energy Strategy**

29 The 2014 Regional Energy Strategy is an energy policy guide used to support decision-making by the San
30 Diego Association of Governments and its member agencies through 2050, with the goal of assisting the
31 San Diego region in meeting the energy needs of a growing population, housing stock, and workforce,
32 while maintaining and enhancing regional quality of life and economic stability. To accomplish these
33 objectives among other things, the Regional Energy Strategy calls for increased use of natural gas for
34 certain transportation applications and the continued efficient use of electricity generation.

35
36 **County of San Diego Climate Action Plan**

37 The County of San Diego developed its Climate Action Plan (CAP) in 2012 to address the issues of
38 growth and climate change, safeguard the environment for residents and visitors, and reduce county GHG
39 emissions consistent with state legislative requirements. Emissions reduction measures outlined in the
40 CAP include increasing transit use, walking and biking, and ridesharing (County of San Diego 2017). In
41 July 2015, the County of San Diego initiated work on the revised CAP, and the county's Board of
42 Supervisors adopted it on February 14, 2018. The CAP includes strategies and measures to reduce GHG
43 emissions from "county operations," i.e., GHG emissions generated by facilities and operational activities
44 throughout the county, including facilities and operations located within incorporated cities. In addition to
45 strategies and measures to reduce GHG emissions, the CAP also includes a threshold of significance for

1 GHG emissions and revised Guidelines for Determining Significance for Climate Change (County of San
2 Diego 2018a, 2018b).

3 4 **City of San Diego Climate Action Plan**

5 The City of San Diego adopted its CAP in December 2015 to proactively address environmental
6 concerns, such as achieving GHG reduction targets in line with E.O. S-3-05. This CAP includes a
7 municipal operations and community-wide GHG emissions baseline calculation from 2010, and sets a
8 target of achieving a 15 percent reduction from the baseline by 2020 and an 80 percent reduction by 2050.
9 Measures to achieve these targets include strategies centered around energy and water efficient buildings,
10 clean and renewable energy, transit and land use, zero waste, and climate resiliency (City of San Diego
11 2015).

12 13 **5.7.3 Environmental Impacts and Assessment**

14 15 **Applicant-Proposed Measures**

16 SDG&E has not incorporated applicant-proposed measures into the proposed project to specifically
17 minimize or avoid impacts related to GHGs. However, SDG&E has been engaged for many years in
18 efforts to reduce GHG emissions. SDG&E would submit a mandatory Long-Term Procurement Plan to
19 the CPUC, describing its strategy to meet forecasted load during the next 10 years. This plan must be
20 consistent with the “Loading Order” prescribed in the Energy Action Plan to meet growth first with
21 conservation, then with renewable sources of electricity, and finally with new fossil fuel sources to the
22 extent necessary. These efforts will reduce carbon intensity by one-third while accommodating continued
23 population growth, and will ensure conformity with the applicable plans, policies, and regulations adopted
24 by California to reduce GHG emissions.

25 26 **Significance Criteria**

27 As noted in the “Regional and Local Regulatory Setting,” above, San Diego County’s CAP includes
28 strategies and measures to reduce GHG emissions from county operations. It aims to meet the state’s
29 2020 and 2030 GHG reduction targets and demonstrate progress towards the 2050 GHG reduction goal.

30
31 As explained in the CAP’s companion document, *Guidelines for Determining Significance for Climate*
32 *Change*, the CAP establishes a threshold of significance for evaluating climate change impacts under
33 CEQA. The significance threshold states: “A proposed project would have a less-than-significant
34 cumulatively considerable contribution to climate change impacts if it is found to be consistent with the
35 County’s Climate Action Plan; and, would normally have a cumulatively considerable contribution to
36 climate change impacts if it is found to be inconsistent with the County’s Climate Action Plan” (County
37 of San Diego 2018). The proposed project would encompass approximately 8 miles of electrical utility
38 corridors spanning two municipalities, each with an adopted CAP, in addition to San Diego County’s
39 CAP, which addresses GHG emissions in unincorporated areas.

The proposed project does not represent an expansion of electrical service and would not directly or indirectly induce population growth. Upon implementation of the proposed project, the electrical network would be reconfigured underground to replace three (segments of) circuits that currently exist in a high-wire over land connection.

While the proposed project is a reconfiguration/rerouting of existing transmission lines, as opposed to energy generation, its operation would not therefore represent a substantive change to existing operational characteristics or output capacities of existing circuits. For this project, GHGs would be generated solely by construction, and the anticipated amounts are based on modeling (Appendix E).

Further, the CPUC took a conservative approach by using the South Coast Air Quality Management District’s (SCAQMD’s) GHG thresholds in this analysis. The SCAQMD prepared the *Interim CEQA GHG Thresholds for Stationary Sources, Rules, and Plans*, which sets the GHG significance threshold for industrial uses at 10,000 MTCO₂e per year. Thus, an industrial project would not generate GHG emissions that would have a significant impact on the environment if the emissions were below this significance threshold. The SCAQMD has not set specific thresholds for construction; rather, the SCAQMD and the County of San Diego recommend amortizing (gradually reducing) construction emissions over a 30-year period in the impact analysis to account for their contribution to GHG emissions over the lifetime of the proposed project.

Table 5.7-4 includes the significance criteria from Appendix G of the CEQA Guidelines’ GHG section to evaluate the environmental impacts of the proposed project.

Table 5.7-4 Greenhouse Gases Checklist

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

The primary source of GHG emissions associated with the proposed project would be fossil fuel combustion from vehicles, construction equipment, and helicopter-use during construction. GHG emissions for construction were calculated using the same approach as criteria pollutant emissions for overall construction emissions (see Section 5.3, “Air Quality,” for more information). Estimated GHG emissions are summarized in Table 5.7-5, below. The proposed project’s total annualized construction CO₂e emissions of ~~32.55~~ 35.12 metric tons would be below the SCAQMD’s significance threshold of

1 10,000 MTCO₂e emissions annually. Thus, the proposed project’s GHG emissions would be less than
2 significant.

3

Table 5.7-5 Greenhouse Gas Construction Emissions

Category	GHG Emissions (MT)		
	CO ₂	CH ₄	N ₂ O
Construction Equipment and Vehicles	899.66	0.16	0.00
Helicopter Use ^(a)	73.50	0.00	0.00
<u>Substation Modifications</u>	<u>23.31</u>	<u>0.01</u>	<u>0.00</u>
Total Construction Emissions	<u>973.16</u>	<u>0.16</u>	0.00
	<u>977.47</u>	<u>0.17</u>	
Global Warming Potential	1	21	310
CO ₂ e	<u>973.16</u>	<u>3.44</u>	0.00
	<u>996.47</u>	<u>3.57</u>	
Total CO₂e		<u>976.6</u>	
		<u>1,000.04</u>	
Amortized Construction Emissions (Amortized over 30 years)		32.55	
		<u>33.33</u>	
<u>Annual Fugitive SF₆ Emissions^(b)</u>		<u>1.79</u>	
Total Annual CO₂e		<u>35.12</u>	
SCAQMD Significance Threshold		10,000	
SCAQMD Significance Threshold Exceeded?		No	

Notes:

^(a) See Appendix E, *Greenhouse Gas Helicopter Emission Report*, for helicopter greenhouse gas emission estimates during construction.

^(b) The replacement of an existing circuit breaker (which is needed to meet new SDG&E design standards) at the Del Mar Substation will contain approximately 33 pounds of SF₆, with a maximum annual leak rate of 0.5 percent.

Key:

CH₄ = methane

CO₂e = carbon dioxide equivalent

GHG = greenhouse gas

MT = metric tons

N₂O = nitrous oxide

SCAQMD = South Coast Air Quality Management District

SDG&E = San Diego Gas and Electric Company

SF₆ = sulfur hexafluoride

4

5 Activities associated with the removal of the existing oil-filled circuit breaker and replacement with a
6 modern SF₆ breaker is accounted for as part of the various project activities that could generate GHG
7 and contribute to climate change.

8

9 GHG emissions during operation and maintenance of the proposed project would be relatively low,
10 resulting only from scheduled operation and maintenance activities, which would be conducted in the
11 same manner as they were prior to implementation of the proposed project. The proposed underground
12 duct banks within Via De La Valle would be installed parallel to existing facilities where operation and
13 maintenance activities are currently conducted. Further, the removal of approximately 6 miles of 69-
14 kilovolt power lines from TL666D would eliminate all future operation and maintenance activities
15 associated with that facility. Converting C510 and C738 would eliminate the operation and maintenance
16 requirements currently associated with approximately 4,530 feet of existing overhead distribution line.
17 Removal of existing overhead facilities and installation of the proposed project’s components in areas
18 already covered by existing operation and maintenance activities would reduce post-construction
19 operation and maintenance requirements in the project area. These activities would ~~not generate an~~

1 represent a substantial increase in GHG emissions when compared to ~~their current levels~~ emissions
2 resulting from existing operation and maintenance activities; therefore, GHG emissions during the
3 proposed project’s operation and maintenance activities would be less than significant.

4
5 **Significance: Less than Significant**

6
7 ***b. Would the project conflict with any applicable plan, policy or regulation of an agency adopted for***
8 ***the purpose of reducing the emissions of greenhouse gases?***

9
10 Table 5.7-6 sets forth the relevant plans, policies, and regulations that address statewide actions aimed at
11 meeting GHG reduction targets. Implementation of the project would not create a new source of GHG
12 emissions. The electrical network would function in a manner similar to existing conditions upon
13 implementation of project reconfigurations. If the proposed project meets its stated objectives, proposed
14 reconfigured infrastructure would operate with greater reliability because lines that had been exposed to
15 the elements in areas difficult to access would now be underground, protected from wind and fire and
16 other risks.

17
Table 5.7-6 Project Conformity with Plans, Policies, and Regulations

Plan, Policy, or Regulation	Conformity Evaluation
Federal Vehicle Emissions Standards	The proposed project would utilize vehicles subject to federal vehicle regulations and would therefore comply with federal vehicle emissions standards. The proposed project would not conflict with this regulation.
Mandatory Reporting of Greenhouse Gas Emissions	The proposed project would emit less than 25,000 metric tons of GHGs per year, as discussed under significance criterion (a). Therefore, mandatory reporting requirements would not apply to the proposed project.
AB-32 California Climate Change Scoping Plan	The proposed project would be subject to and comply with policies and measures in the AB-32 Californian Climate Change Scoping Plan (Scoping Plan) that have been and will be implemented as regulations. The California Climate Change Scoping Plan sets forth GHG reduction measures such as energy efficiency, recycling and waste reduction, and the Low Carbon Fuel Standard and light and heavy-duty GHG standards. The proposed project would be in compliance with fuel, vehicle, and recycling measures. The proposed project’s GHG emissions would not exceed the state’s quantitative GHG thresholds, which were developed to comply with the California Climate Change Scoping Plan statewide reduction target.
Executive Order S-01-07—Low Carbon Fuel Standard	The proposed project would utilize vehicles subject to federal vehicle regulations and would therefore comply with federal vehicle emissions standards. The proposed project would not conflict with the low carbon fuel standard.
California Renewable Energy Programs	In 2002, California established its Renewables Portfolio Standard with the goal of increasing the state’s use of renewable energy to 20 percent of total energy use by 2017, and subsequent Executive Orders accelerated that goal to 33 percent by 2020 and established renewable energy standards for interim years. Because the proposed project would not involve a decrease or increase in renewable energy generation or aim to specifically increase import of renewable energy, standards outlined in the California Renewable Energy Programs do not apply to the proposed project.
Executive Order B-30-15	Executive Order B-30-15 establishes a new interim statewide GHG emission reduction target of 40 percent below 1990 levels by 2030 and requires state agencies to give priority to actions that reduce GHG emissions in their planning and investment decisions. The proposed project would not significantly increase GHG emissions in the project area during construction or operations and maintenance. The proposed project would therefore not conflict with Executive Order B-30-15.

Table 5.7-6 Project Conformity with Plans, Policies, and Regulations

Plan, Policy, or Regulation	Conformity Evaluation
Advanced Clean Cars Program	New vehicles (i.e., manufactured between 2017 and 2025) purchased for the proposed project would comply with regulations in the Advanced Clean Cars Program. Therefore, the proposed project would not conflict with the Advanced Clean Cars Program.
Heavy-Duty Truck GHG Regulations	Heavy duty trucks and trailers used for the proposed project would comply with state GHG regulations pertaining to those types of equipment. Therefore, the proposed project would therefore not conflict with heavy-duty truck GHG regulations.
On-Road Heavy Duty Diesel Vehicle Regulations	Heavy duty diesel vehicles used for the proposed project would comply with state GHG regulations pertaining to those types of equipment. The proposed project would therefore not conflict with on-road heavy-duty diesel vehicle regulations.
State Regulations for Reducing SF ₆ Emissions from Gas Insulated Switchgear (17 CCR Sections 95350 to 95359)	State Regulations for Reducing SF ₆ Emissions from Gas Insulated Switchgear limit SF ₆ emissions from all gas-insulated equipment to 1 percent per year by 2020. Such equipment used on the proposed project would possess a manufacturer's certified SF ₆ leak rate of 0.5 percent per year or less. The applicant would also implement best management practices to reduce SF ₆ emissions during operations and maintenance of the proposed project, and would report SF ₆ emissions from the use of gas-insulated equipment on the proposed project to CARB, as required by this regulation. Therefore, the proposed project would not conflict with state SF ₆ regulations.
California Green Building Code (CCR, Title 24, Part 11)	The project proponent would be required to comply with nonhazardous construction and demolition waste requirements, as outlined in the California Green Building Code, for the construction and demolition of nonresidential building structures. Therefore, the proposed project would not conflict with this regulation.
AB-1826	Waste materials generated during construction of the proposed project would be salvaged, recycled, or disposed of in the appropriate manner and in compliance with applicable regulations. Therefore, the proposed project would not conflict with this regulation.
San Diego County Climate Action Plan	The County of San Diego adopted its Climate Action Plan in June 2012 to address climate change in the county. In November 2013, the county released its Guidelines for Determining Significance for Climate Change which includes a framework for determining the significance of GHG emissions from developed projects. The guidelines state that a project would have a significant impact if it increases operational greenhouse gas emissions by 2,500 MTCO _{2e} per year. ^(a) Since the proposed project's estimated total CO _{2e} is less than this threshold, it would not cause a significant impact and would not conflict with the San Diego County Climate Action Plan.
City of San Diego Climate Action Plan and City of San Diego Development Services draft GHG significance thresholds.	In February 2014, the City of San Diego released its Draft Climate Action Plan, which identifies measures to effectively meet GHG reduction targets for 2020 and 2035. In March 2013, the City of San Diego Development Services Department released draft GHG significance thresholds of 2,500 MTCO _{2e} per year) may be used for all land use development projects other than stationary sources. Since the proposed project's estimated total CO _{2e} is less than this threshold, it would not cause a significant impact and would not conflict with the City of San Diego Climate Action Plan.

Note:

^(a) Though this threshold was invalidated through legal action in 2014, it was used as a reference for purposes of this analysis.

Key:

AB = Assembly Bill

AB-32 California Climate Change Scoping Plan = Scoping Plan

CCR = California Code of Regulations

GHG = greenhouse gas

MTCO_{2e} = metric tons of carbon dioxide equivalent

SF₆ = sulfur hexafluoride

- 1
- 2 Given that project implementation would not create new GHG emissions, and for the reasons set forth in
- 3 Table 5.7-6, the proposed project would not conflict with any the plans, policies, or actions adopted for
- 4 the purpose of reducing GHG emissions. Further, while project construction activities would generate

1 GHG emissions, these would be below significance thresholds as discussed in the analysis under criterion
2 (a). The proposed project would neither hinder nor obstruct the achievement of the various goals
3 established to reduce GHG emissions. It would not contribute considerably to cumulative GHG impacts.

4
5 **Significance: Less than Significant**

6
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