

## 5.6 GREENHOUSE GAS EMISSIONS

This section describes the project area's existing conditions, potential environmental impacts, recommended mitigation measures to help reduce or avoid impacts (if necessary), and the level of significance of project after mitigation as they relate to greenhouse gas (GHG) emissions. GHG emissions have the potential to adversely affect the environment because such emissions contribute, on a cumulative basis, to global climate change. This section also provides a background discussion of climate change, a discussion of existing sources of GHG emissions, and a summary of applicable regulations.

### 5.6.1 EXISTING CONDITIONS

#### 5.6.1.1 Existing GHG Emissions

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. A portion of the solar radiation that enters the earth's atmosphere is absorbed by the earth's surface, and a smaller portion of this radiation is reflected back towards space. This infrared radiation (i.e., thermal heat) is absorbed by GHGs within the earth's atmosphere. As a result, infrared radiation released from the earth that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the "greenhouse effect," is responsible for maintaining a habitable climate on the earth.

GHGs are present in the atmosphere naturally, are released by natural and anthropogenic sources, and are formed from secondary chemical reactions taking place in the atmosphere. Natural sources of GHGs include the respiration of humans, animals and plants, decomposition of organic matter, and evaporation from the oceans. Anthropogenic (of, relating to, or resulting from the influence of human beings on nature) sources include the combustion of fossil fuels, waste treatment, and agricultural processes. The following are GHGs that are widely accepted as the principal contributors to human-induced global climate change:

- Carbon dioxide (CO<sub>2</sub>)
- Methane (CH<sub>4</sub>)
- Nitrous oxide (N<sub>2</sub>O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur Hexafluoride (SF<sub>6</sub>)
- Nitrogen Trifluoride (NF<sub>3</sub>)

CH<sub>4</sub> is the main component of natural gas and is associated with agricultural practices and landfills. N<sub>2</sub>O is a colorless GHG that results from industrial processes, vehicle emissions, and agricultural practices. HFCs are synthetic chemicals used as a substitute for chlorofluorocarbons in automobile air conditioners and refrigerants. PFCs are produced as a byproduct of various industrial processes associated with aluminum production and the manufacturing of semiconductors. SF<sub>6</sub> is an inorganic, odorless, colorless, nontoxic, nonflammable GHG used for insulation in electric power transmission and distribution equipment and in semiconductor manufacturing. NF<sub>3</sub> is used in the electronics industry during the manufacturing of consumer items, including photovoltaic solar panels and liquid-crystal-display (LCD) television screens.

Global warming potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to CO<sub>2</sub>. The GWP of a GHG is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time (i.e., lifetime) that the gas remains in

the atmosphere (“atmospheric lifetime”). The reference gas for GWP is CO<sub>2</sub>; therefore, CO<sub>2</sub> has a GWP of 1. The other main GHGs that have been attributed to human activity include CH<sub>4</sub>, which has a GWP of 28, and N<sub>2</sub>O, which has a GWP of 265 (IPCC 2013). For example, 1 ton of CH<sub>4</sub> has the same contribution to the greenhouse effect as approximately 28 tons of CO<sub>2</sub>. GHGs with lower emissions rates than CO<sub>2</sub> may still contribute to climate change, because they are more effective at absorbing outgoing infrared radiation than CO<sub>2</sub> (i.e., high GWP). The concept of CO<sub>2</sub>-equivalents (CO<sub>2</sub>e) is used to account for the different GWP potentials of GHGs to absorb infrared radiation.

GHG emissions related to human activities have been determined as “extremely likely” responsible (indicating 95 percent certainty) for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth’s atmosphere and oceans, with corresponding effects on global circulation patterns and climate (ARB 2014c). The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, no single project alone is expected to measurably contribute to a noticeable incremental change in the global average temperature, or to a global, local, or micro climate.

### 5.6.1.2 GHG Emission Sources

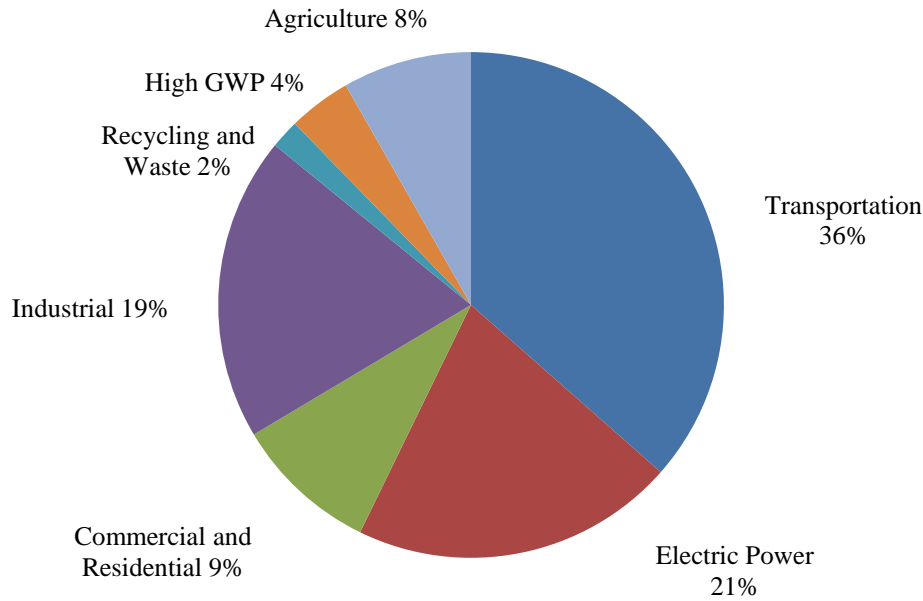
GHG emissions contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, electric utility, residential, commercial, and agricultural categories. Emissions of CO<sub>2</sub> are byproducts of fossil fuel combustion, and CH<sub>4</sub>, a highly potent GHG, is the primary component in natural gas and is associated with agricultural practices and landfills. N<sub>2</sub>O is also largely attributable to agricultural practices and soil management.

For purposes of accounting for and regulating GHG emissions, sources of GHG emissions are grouped into emission categories. The California Air Resources Board (ARB) identifies the following main GHG emission categories that account for most anthropogenic GHG emissions generated within California:

- *Transportation:* On-road motor vehicles, recreational vehicles, aviation, ships, and rail.
- *Electric Power:* Use and production of electrical energy.
- *Industrial:* Mainly stationary sources (e.g., boilers and engines) associated with process emissions.
- *Commercial and Residential:* Area sources, such as landscape maintenance equipment, fireplaces, and consumption of natural gas for space and water heating.
- *Agriculture:* Agricultural sources that include off-road farm equipment; irrigation pumps; crop residue burning (CO<sub>2</sub>); and emissions from flooded soils, livestock waste, crop residue decomposition, and fertilizer volatilization (CH<sub>4</sub> and N<sub>2</sub>O).
- *High GWP:* Refrigerants for stationary and mobile-source air conditioning and refrigeration, electrical insulation (e.g., SF<sub>6</sub>), and various consumer products that use pressurized containers.
- *Recycling and Waste:* Waste management facilities and landfills; primary emissions are CO<sub>2</sub> from combustion and CH<sub>4</sub> from landfills and wastewater treatment.

ARB performs an annual GHG inventory for emissions of the major GHGs. As shown in the pie chart below (California GHG Emissions by Category), California produced 459 million metric tons (MMT) of CO<sub>2</sub>e in 2012 (ARB 2014d). Combustion of fossil fuels in the transportation category was the single

largest source of California’s GHG emissions in 2012, accounting for 36 percent of total GHG emissions in the State. The transportation category was followed by the electric power category (including in- and out-of-state sources), which accounts for 21 percent of total GHG emissions in California, and the industrial category, which accounts for 19 percent of the State’s total GHG emissions (ARB 2014d).



Pie Chart: California GHG Emissions by Category  
 Source: ARB 2014d.

5.6.1.3 Global Climate Trends and Associated Impacts

The Intergovernmental Panel on Climate Change (IPCC) concluded that variations in natural phenomena, such as solar radiation and volcanoes, produced most of the warming from pre-industrial times to 1950, and had a small cooling effect afterward. However, after 1950, increasing GHG concentrations resulting from human activity, such as fossil fuel burning and deforestation, have been responsible for most of the observed temperature increase.

Warming of the climate system is now considered to be unequivocal, with global surface temperature increasing approximately 1.53 degrees Fahrenheit (°F) over the last 140 years (IPCC 2013). The rate of increase in global average surface temperature has not been consistent; the last three decades have warmed at a much faster rate per decade (IPCC 2013).

During the same period when increased global warming has occurred, many other changes have occurred in other natural systems. Sea levels have risen; precipitation patterns throughout the world have shifted, with some areas becoming wetter and others drier; snowlines can rise, resulting in changes to the snowpack, runoff, and water storage; and numerous other conditions have been observed. Although it is difficult to prove a definitive cause-and-effect relationship between global warming and other observed changes to natural systems, there is a high level of confidence in the scientific community that these changes are a direct result of increased global temperatures caused by the increased presence of GHGs in the atmosphere (IPCC 2013).

Additional changes related to climate change can be expected by the year 2050 and on to the end of the century:

- California’s mean temperature may rise 2.7°F by 2050 and 4.1°F to 8.6°F by the end of the century (CEC 2012). Temperatures in Orange County may rise 3.6°F to 6.1°F during that same period (CEC 2014).
- Sea level rise is expected to continue, and the most recent climate science report, *Sea Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future*, has estimated that sea levels along the United States Pacific Coast would increase up to 66 inches by 2100 (NRC 2012). The project area would not be subject to flooding as a result of climate change–related sea level rise.
- Various California climate models provide mixed results regarding forecasted changes in total annual precipitation in the state through the end of this century. However, recent projections suggest that 30-year statewide average precipitation will decline by more than 10 percent (CEC 2012).

#### 5.6.1.4 Regulatory Setting

The following section provides a summary of the federal, State, and local policies concerning GHG emissions and global climate change.

##### Federal

The United States Environmental Protection Agency (USEPA) is the federal agency responsible for implementing the federal Clean Air Act (CAA).

##### *USEPA “Endangerment” and “Cause or Contribute” Findings*

The United States Supreme Court held that the USEPA must consider regulation of motor vehicle GHG emissions. In *Massachusetts v. Environmental Protection Agency* (2007 549 US 497, 12), states (including California) and cities along with several environmental organizations sued to require the USEPA to regulate GHGs as pollutants under the Clean Air Act (CAA) (127 S. Ct. 1438 [2007]). The United States Supreme Court ruled that GHGs fit within the CAA’s definition of a pollutant and that the USEPA had the authority to regulate GHGs. On December 7, 2009, the USEPA Administrator signed the following two distinct findings regarding GHGs under Section 202(a) of the CAA:

- Endangerment Finding: The current and projected concentrations of the six key GHGs—CO<sub>2</sub>, methane, nitrous oxide, HFCs, PFCs, and SF<sub>6</sub>—in the atmosphere threaten the public health and welfare of current and future generations.
- Cause or Contribute Finding: The combined emissions of these GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that threatens public health and welfare.

##### *Mandatory GHG Reporting Rule*

On September 22, 2009, the USEPA released its final GHG Reporting Rule (Reporting Rule). The Reporting Rule is a response to the fiscal year 2008 Consolidated Appropriations Act (House of Representatives Bill 2764; Public Law 110-161), which required the USEPA to develop “...mandatory reporting of GHGs above appropriate thresholds in all sectors of the economy....” The Reporting Rule applies to most entities that emit 25,000 metric tons (MT) of CO<sub>2</sub>e or more per year. Since 2010, facility

owners have been required to submit an annual GHG emissions report with detailed calculations of the facility's GHG emissions. The Reporting Rule also mandates compliance with recordkeeping and administrative requirements to enable the USEPA to verify annual GHG emissions reports.

### *Council on Environmental Quality Guidance*

On February 18, 2010, the Council on Environmental Quality (CEQ) chair issued a memorandum titled "Draft National Environmental Policy Act [NEPA] Guidance on Consideration of the Effects of Climate Change and Greenhouse Gas Emissions" (CEQ 2010). The draft guidance recognizes that many federal actions would result in the emission of GHGs, and that, where a proposed federal action may emit GHG emissions "in quantities that the agency finds may be meaningful," CEQ proposes that the federal agency's NEPA analysis focus on aspects of the environment that are affected by the proposed action and the significance of climate change for those aspects of the affected environment. In particular, the guidance proposes a reference point of 25,000 MT per year of direct GHG emissions as a "useful indicator" of when federal agencies should evaluate climate change impacts in their NEPA documents. CEQ notes that this indicator is not an absolute standard or threshold to trigger the discussion of climate change impacts.

### *USEPA and NHTSA Motor Vehicle Standards*

On May 7, 2010, the USEPA published the "Final Rule for Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards" was published in the Federal Register (75 Federal Register 25323–25728). The USEPA and the National Highway Traffic Safety Administration (NHTSA) are taking coordinated steps to enable automakers to produce a new generation of vehicles that emit fewer GHGs and offer improved fuel efficiency. The final combined USEPA/NHTSA standards that make up the first phase of this national program apply to passenger cars, light-duty trucks, and medium-duty passenger vehicles, covering model years 2012 through 2016. The USEPA and NHTSA issued a second joint rulemaking on September 15, 2011 that established a comprehensive Heavy-Duty National Program to reduce GHG emissions and fuel consumption for model year 2014 to 2018 on-road heavy-duty vehicles. On August 28, 2012, the USEPA and NHTSA issued a final rulemaking for fuel-economy and GHG standards for model year 2017 through 2025 passenger vehicles and light-duty trucks.

### State

The legal framework for GHG emission reductions has come about through governors' executive orders, legislation, and regulation. The major components of California's climate change policy are reviewed below.

### *Assembly Bill 1493*

Assembly Bill (AB) 1493 requires ARB to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with model year 2009. In June 2009, the USEPA Administrator granted a CAA waiver of preemption to California. This waiver allowed California to implement its own GHG emissions standards for motor vehicles beginning with model year 2009. California agencies worked with federal agencies to conduct joint rulemaking to reduce GHG emissions for passenger car model years 2017 to 2025.

### *Executive Order S-3-05*

Executive Order S-3-05, issued in recognition of California's vulnerability to the effects of climate change, set forth the following target dates by which statewide GHG emissions would be progressively reduced: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.

### *Assembly Bill 32*

In 2006, California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500, et seq.). AB 32 further details and puts into law the mid-term GHG reduction target established in Executive Order S-3-05: reduce GHG emissions to 1990 levels by 2020. AB 32 also identifies ARB as the state agency responsible for the design and implementation of emissions limits, regulations, and other measures to meet the target.

In December 2008, ARB adopted its Climate Change Scoping Plan (Scoping Plan), which contains the main strategies California will implement to achieve the required GHG reductions required by AB 32 (ARB 2008). The Scoping Plan also includes ARB-recommended GHG reductions for each emissions sector of California's GHG inventory. ARB further acknowledges that decisions about how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emissions sectors.

ARB is required to update the Scoping Plan at least once every 5 years to evaluate progress and develop future inventories that may guide this process. ARB approved the *First Update to the Climate Change Scoping Plan: Building on the Framework* in June 2014 (ARB 2014c). The Scoping Plan update includes a status of the 2008 Scoping Plan measures and other state, federal, and local efforts to reduce GHG emissions in California and potential actions to further reduce GHG emissions by 2020.

### *Executive Order S-13-08 (Climate Adaptation Strategy)*

Executive Order S-13-08 was issued November 14, 2008 to enhance the State's management of potential climate effects from sea level rise, increased temperatures, shifting precipitation and extreme weather events. The Executive Order included four key actions:

- Initiate California's first statewide climate change adaptation strategy that will assess the state's expected climate change impacts, identify where California is most vulnerable and recommend climate adaptation policies by early 2009;
- Request the National Academy of Science to establish an expert panel to report on sea level rise impacts in California to inform state planning and development efforts;
- Issue interim guidance to state agencies for how to plan for sea level rise in designated coastal and floodplain areas for new projects; and
- Initiate a report on critical existing and planned infrastructure projects vulnerable to sea level rise.

The California Natural Resources Agency was directed to coordinate with local, regional, state, and federal public and private entities to develop the California Climate Adaptation Strategy, which summarizes the best known science on climate change impacts to California, assesses California's

vulnerability to the identified impacts, and then outlines solutions that can be implemented within and across state agencies to promote resiliency.

### *Executive Order S-1-07*

Executive Order S-1-07 acknowledges that the transportation sector is the main source of GHG emissions in California. The order established a goal of reducing the carbon intensity of transportation fuels sold in California by a minimum of 10 percent by 2020. It also directed ARB to determine whether this Low Carbon Fuel Standard could be adopted as a discrete, early-action measure after meeting the mandates in AB 32. ARB adopted the Low Carbon Fuel Standard on April 23, 2009.

### *Senate Bill 97*

Senate Bill (SB) 97, enacted in August 2007, recognizes climate change as a prominent environmental issue that requires analysis under CEQA. On December 30, 2009, the Natural Resources Agency adopted amendments to the State CEQA Guidelines, as required by SB 97. These State CEQA Guidelines amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in draft CEQA documents. The amendments became effective March 18, 2010.

### *Senate Bills X1-2 and Executive Orders S-14-08 and S-21-09*

Executive Order S-14-08 expanded the state's Renewable Portfolio Standard to 33 percent renewable power by 2020. Executive Order S-21-09 directs ARB under its AB 32 authority to enact regulations to help the state meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020. The 2020 goal was codified in April 2011 with SB X1-2. This new Renewable Portfolio Standard applies to all electricity retailers in the state, including publicly owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators.

### *Senate Bill 375*

In addition to policy directly guided by AB 32, the Legislature in 2008 passed SB 375, which provides for regional coordination in land use and transportation planning and funding to help meet the AB 32 GHG reduction goals. SB 375 aligns regional transportation planning efforts, regional GHG emissions reduction targets, and land use and housing allocations. SB 375 requires regional transportation plans (RTPs) developed by the state's 18 metropolitan planning organizations (MPOs) to incorporate a "sustainable communities strategy" that will achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects.

### *Green Building Standards Code*

In January 2010, the State of California adopted the California Green Building Standards Code, which establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include a mandatory set of minimum guidelines, as well as more rigorous voluntary measures, for new construction projects to achieve specific green building performance levels. This code went into effect as part of local jurisdictions' building codes on January 1, 2011. The 2013 update to the code has been adopted by the State of California and became effective January 2014. (Title 24 CCR Part 11.)

## Local

There are no regional or local regulations or policies related to GHG emissions that are applicable to the proposed project. The County of Orange and the City of Yorba Linda do not have current climate action plans or specific policies set forth in their respective general plans regulating GHG emissions. SCAQMD does not have any Rules regulating GHG that are directly applicable to the proposed project.

### 5.6.2 THRESHOLDS OF SIGNIFICANCE

Based upon the thresholds contained in Appendix G of the CEQA Guidelines, implementation of the project would result in a significant adverse impact related to GHG emissions if it would:

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

The SCAQMD has adopted a significance threshold of 10,000 MT of CO<sub>2</sub> per year for industrial projects (SCAQMD 2008a). However, SCAQMD has not adopted GHG thresholds for other types of projects, including the proposed project. The SCAQMD GHG CEQA Significance Threshold Stakeholder Working Group has recommended options for evaluating non-industrial projects including thresholds for residential, commercial, and mixed use projects (SCAQMD 2010). The aforementioned SCAQMD draft thresholds propose an annual emission rate of of 3,000 MT CO<sub>2</sub>e for all non-industrial projects or the use of an efficiency metric of 4.8 MT CO<sub>2</sub>e per “service population” per year. (Service population is defined as the sum of the residential population and employees for a project. GHG efficiency is then determined by dividing the CO<sub>2</sub>e MT per year emissions, divided by the service population). At the time of this analysis, these draft thresholds have not been adopted by the SCAQMD. Since the proposed project would be used for recreational purposes by residents and visitors to commercial land uses, it is not an industrial project, and lacking any adopted applicable thresholds, the proposed SCAQMD threshold of 3,000 MT CO<sub>2</sub>e per year will be used for this analysis. The use of the efficiency metric is more appropriate for specific plan or general plan analyses and is therefore not used here.

The SCAQMD recommends that construction emissions associated with a project be amortized over the life of the project (typically 30 years) and added to the operational emissions. Therefore, this analysis includes a quantification of total modeled construction-related GHG emissions. Those emissions are then amortized and evaluated as a component of the proposed project’s operational emissions over the 30-year life of the project.

### 5.6.3 METHODOLOGY RELATED TO GHG EMISSIONS

The methodology used to quantify and analyze the project’s contribution to global climate change includes quantification of GHG emissions. These are typically analyzed and expressed for both construction and operation of a project and are described below.

#### 5.6.3.1 Construction

Heavy-duty off-road equipment, material transport, and worker commutes during construction of the proposed project would result in exhaust-related GHG emissions. GHG emissions generated by construction activities would be primarily in the form of CO<sub>2</sub>. Although emissions of other GHGs, such as



CH<sub>4</sub> and N<sub>2</sub>O, are important with respect to global climate change, the emission levels of these other GHGs from on- and off-road vehicles used during construction are relatively small compared with CO<sub>2</sub> emissions, even when factoring in the relatively larger GWP of CH<sub>4</sub> and N<sub>2</sub>O.

Construction-related emissions for the proposed project were estimated using emission factors from ARB’s OFFROAD and EMFAC 2011 inventory models (ARB 2013). Construction emissions from the operation of diesel-fueled off-road equipment were estimated by multiplying daily usage (i.e., hours per day) and total days of construction by OFFROAD equipment-specific emission factors. GHG emissions from on-road motor vehicles were estimated using vehicle trips, vehicle miles traveled (VMT), and EMFAC2011 mobile source emission factors. The emission factors represent the fleet-wide average emission factors within Orange County.

5.6.3.2 Operation

The proposed project includes the future operation of a small staging area to serve trail users that would include a public restroom, a small parking lot, minimal security lighting, and potable water for trail users but would not significantly increase the generation or use of electricity, water, wastewater, and solid waste. Additionally, the proposed project is not anticipated to generate substantial new vehicle trips and would generate only negligible additional activities related to maintenance or operations that would substantially exceed existing levels. Therefore, operational GHG emissions were not estimated for the proposed project.

5.6.4 POTENTIAL IMPACTS

5.6.4.1 GHG Emissions and Climate Change Impacts

Generate GHG Emissions, Either Directly or Indirectly, That May Have a Significant Impact on the Environment

Project construction is estimated to occur over approximately 18 months. Given that exhaust emissions from the construction equipment fleet are expected to decrease over time as stricter standards take effect, maximum daily construction emissions were estimated using the earliest calendar year when construction could begin (i.e., 2017) to generate conservative estimates. If construction occurs in later years, advancements in engine technology, retrofits, and turnover in the equipment fleet are anticipated to result in lower levels of emissions.

As shown in Table 5.6-1, the construction emissions over the construction period for the project would be approximately 1,196 MT CO<sub>2</sub>e. When this total is amortized over the 30-year life of the project, annual construction emissions would be approximately 40 MT CO<sub>2</sub>e per year.

**TABLE 5.6-1  
CONSTRUCTION-RELATED GHG EMISSIONS**

<b>Emission Source</b>	<b>Emissions MT CO<sub>2</sub>e</b>
Total Construction-Related GHG Emissions	1,196
Amortized GHG Emissions <sup>1</sup>	40
<b>SCAQMD Threshold</b>	3,000
<b>Exceed Threshold?</b>	No

<sup>1</sup> Amortized over a 30-year project lifetime.  
Source: AECOM (2014).

As shown in Table 5.6-1, both the total and amortized construction-related CO<sub>2</sub>e emissions associated with the proposed project would be less than the 3,000 MT threshold of significance recommended by SCAQMD. Therefore, the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Therefore, impacts would be less than significant.

### Conflict with an Applicable Plan, Policy, or Regulation Adopted for the Purpose of Reducing GHG Emissions

ARB's *First Update to the Climate Change Scoping Plan: Building on the Framework* includes measures to meet California's goal of reducing emissions to 1990 levels by 2020 and also reiterates the State's role in the long-term goal established in Executive Order S-3-05, which is to reduce GHG emissions to 80 percent below 1990 levels by 2050.

The Scoping Plan update provides discussions of sector-specific (e.g., transportation) issues, technologies, needs, and ongoing State activities to significantly reduce emissions through 2050. Achieving California's long-term will require improved vehicle efficiency, reduced carbon content of fuels, planning and building communities to reduce vehicular GHG emissions and provide more transportation options, and improve the efficiency and throughput of existing transportation systems (ARB 2014c).

ARB's Scoping Plan update includes measures that would indirectly address GHG emissions from construction activities, including the phasing-in of cleaner technology for diesel engine fleets and the development of a Low Carbon Fuel Standard. Policies formulated under the mandate of AB 32 that apply to construction-related activity, either directly or indirectly, are assumed to be implemented statewide and would affect the proposed project should those policies be implemented before construction begins. The proposed project would comply with any mandate or standards set forth by the Scoping Plan update.

As discussed above, the County of Orange and the City of Yorba Linda do not have any applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. However, the proposed project would develop recreational trails, which would be consistent with the goals of the Resources and Recreational Elements of the General Plans to preserve open space and provide a regional recreational network.

As discussed earlier, the proposed project does not exceed the threshold of significance for GHG emissions. The approach to developing a threshold of significance for GHG emissions is to identify the level of emissions for which a project would not be expected to substantially conflict with existing California legislation that has been adopted to reduce statewide GHG emissions. The proposed project would be required to comply with applicable regulations, including those developed as measures in the ARB Scoping Plan. No other applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions apply to the proposed project. Therefore, the project would not conflict with any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. Therefore, this impact would be less than significant.

#### 5.6.5 MITIGATION MEASURES

No mitigation measures would be required.

#### 5.6.6 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to GHG emissions would be less than significant.