

4.6 GREENHOUSE GAS EMISSIONS

INTRODUCTION

This section describes current greenhouse gas (GHG) emissions in the region and evaluates the potential GHG emissions impacts of the proposed project based on federal, state, and local planning efforts to reduce GHG emissions. The analysis considers both operational and construction effects of the project. The primary focus of the GHG emissions analysis was to evaluate future project-related emissions. This analysis was conducted following guidance provided by the Bay Area Air Quality Management District (BAAQMD, 2011).

ENVIRONMENTAL SETTING

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. The most common GHGs are carbon dioxide (CO₂) and water vapor but there are also several others, most importantly methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These are released into the earth's atmosphere through a variety of natural processes and human activities.

Sources of GHGs are generally as follows:

- CO₂ and N₂O are byproducts of fossil fuel combustion.
- N₂O is associated with agricultural operations such as fertilization of crops.
- CH₄ is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and sulfur hexafluoride emissions are commonly created by industries such as aluminum production and semi-conductor manufacturing.

Each GHG has its own potency and effect upon the earth's energy balance. This is expressed in terms of a global warming potential (GWP), with CO₂ being assigned a value of 1 and sulfur hexafluoride being several orders of magnitude stronger with a GWP of 23,900. In GHG emission inventories, the weight of each gas is multiplied by its GWP and is measured in units of CO₂ equivalents (CO₂e).

An expanding body of scientific research supports the theory that global warming is currently affecting changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California could be adversely affected by the global warming trend. Increased precipitation and sea level rise could increase coastal flooding, saltwater

intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes, and drought; and increased levels of air pollution.

UNITED STATES EMISSIONS

In 2010, the U.S. emitted about 1,633.2 million metric tons (MMT) of CO₂ equivalent (CO₂e), with each individual at home releasing approximately 4 metric tons per year. Of the four major sectors nationwide – residential, commercial, industrial, and transportation – transportation accounts for the highest amount of GHG emissions (approximately 35 to 40 percent); these emissions are entirely generated from direct fossil fuel combustion. Between 1990 and 2009, total U.S. GHG emissions rose by 7.3 percent, but emissions decreased from 2008 to 2009 by 6.1 percent. This decrease was primarily due to 1) a decrease in economic output resulting in a decrease in energy consumption across all sectors, and 2) a decrease in the carbon intensity of fuels used to generate electricity due to fuel switching as the price of coal increased and the price of natural gas decreased significantly. Since 1990, U.S. emissions have increased at an average annual rate of 0.4 percent (U.S. EPA, 2011).

CALIFORNIA EMISSIONS

According to California Air Resources Board (CARB) emission inventory estimates, California's gross GHG emissions decreased 6 percent, from 478.4 MMT of CO₂e emissions in 2001 to 448.1 MMT in 2011, with a maximum of 489.2 MMT in 2004 (CARB, 2013). California has the fourth lowest per-capita CO₂ emission rate from fossil fuel combustion in the country, due to the success of its energy efficiency and renewable energy programs and commitments that have lowered the state's GHG emissions rate of growth by more than half of what it would have been otherwise (CEC, 2007).

CARB is responsible for developing the California Greenhouse Gas Emission Inventory. This inventory estimates the amount of GHG emitted to and removed from the atmosphere by human activities within California and supports the Assembly Bill 32 Climate Change Program (see "Regulatory Framework" below). The emission inventory estimates are based on the actual amount of all fuels combusted in the state, which accounts for over 85 percent of the GHG emissions within California.

SAN FRANCISCO BAY AREA EMISSIONS

The Bay Area Air Quality Management District (BAAQMD) regularly prepares inventories of criteria and toxic air pollutants to support planning, regulatory, and other programs. The most recent emissions inventory estimates GHG emissions produced in the San Francisco Bay Area in 2007 (BAAQMD, 2010). The inventory, which was published February 2010, updates BAAQMD's previous GHG emissions inventory for base year 2002.

According to BAAQMD, in 2007, 95.8 MMT of CO₂e of GHGs were emitted by the nine-county San Francisco Bay Area. The transportation sector, including on-road motor vehicles, locomotives,

ships and boats, and aircraft, and the industrial/commercial sector (excluding electricity and agriculture) are the largest sources of GHG emissions, each contributing about 36 percent of the region's total CO₂e emissions. Energy production activities such as electricity generation and co-generation were the third largest contributor, with 16 percent of the total GHG emissions. Off-road equipment such as construction, industrial, commercial, and lawn and garden equipment contributed 3 percent of GHG emissions. The contribution from residential fuel usage, primarily from space heating, cooking, and water heating, contributed 7 percent of the total GHG emissions. Agriculture and farming activities was the smallest sector, with 1 percent of the total GHG emissions in the Bay Area.

MARIN COUNTY EMISSIONS

According to the BAAQMD emissions inventory, 2.7 MMT of CO₂e were emitted in Marin County in 2007.

REGULATORY FRAMEWORK

This section summarizes key federal, state, regional, and local statutes, regulations, and policies that would apply to the project. Global climate change resulting from GHG emissions is an emerging environmental concern being raised and discussed at the international, national, and statewide level. At each level, agencies are considering strategies to control emissions of gases that contribute to global climate change.

FEDERAL REGULATIONS

The United States participates in the United Nations Framework Convention on Climate Change (UNFCCC). While the United States signed the Kyoto Protocol, which would have required reductions in GHGs, Congress never ratified the protocol. The federal government chose voluntary and incentive-based programs to reduce emissions and has established programs to promote climate technology and science.

In 2007, the U.S. Supreme Court held that GHGs fit within the federal Clean Air Act's definition of a pollutant and the U.S. Environmental Protection Agency (U.S. EPA) had the authority to regulate GHGs. (*Massachusetts, et al. v. U.S. Env'tl. Prot. Agency, et al.* (2007) 549 U.S. 497.) On December 7, 2009, the U.S. EPA Administrator executed two distinct findings regarding GHGs under Section 202(a) of the federal Clean Air Act: 1) the current and projected concentrations of the six key well-mixed GHGs – CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆ – in the atmosphere threaten the public health and welfare of current and future generations; and 2) the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution that threatens public health and welfare.

STATE REGULATIONS

The State of California is concerned about GHG emissions and their effect on global climate change. The State of California recognizes that "there appears to be a close relationship between the concentration of GHGs in the atmosphere and global temperatures" and that "the "evidence for

climate change is overwhelming.” (CARB, 2003) The effects of climate change on California, in terms of how it would affect the ecosystem and economy, remain uncertain. The State of California has many areas of concern regarding climate change with respect to global warming. According to the 2006 Climate Action Team Report, the following climate change effects and conditions can be expected in California over the course of the next century:

- A diminishing Sierra snowpack declining by 70 percent to 90 percent, affecting the state’s water supply.
- Increasing temperatures from 8 to 10.4 degrees Fahrenheit (°F) under the higher emission scenarios, leading to a 25- to 35-percent increase in the number of days ozone pollution standards are exceeded in most urban areas.
- Coastal erosion along the length of California and seawater intrusion into the Sacramento River Delta from a 4- to 33-inch rise in sea level. This would exacerbate flooding in already vulnerable regions.
- Increased vulnerability of forests due to pest infestation and increased temperatures.
- Increased challenges for the state’s important agricultural industry from water shortages, increasing temperatures, and saltwater intrusion into the Delta.
- Increased electricity demand, particularly in the hot summer months.

Key state regulations involving GHGs and climate change are summarized below.

Assembly Bill 1575 (1975)

In 1975, the Legislature created the California Energy Commission (CEC). The CEC regulates electricity production that is one of the major sources of GHGs.

Title 24, Part 6 of the California Code of Regulations (1978)

The Energy Efficiency Standards for Residential and Nonresidential Buildings were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

Assembly Bill 1493 (2002)

Assembly Bill (AB) 1493 required the California Air Resources Board (CARB) to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks.

State of California Executive Order S-3-05 (2005)

The Governor’s Executive Order established aggressive emissions reductions goals: by 2010, GHG emissions must be reduced to 2000 levels; by 2020, GHG emissions must be reduced to 1990 levels; and by 2050, GHG emissions must be reduced to 80 percent below 1990 levels.

In June 2005, the Governor of California signed Executive Order S-3-05, which identified the California Environmental Protection Agency (Cal/EPA) as the lead coordinating state agency for establishing climate change emission reduction targets in California. A “Climate Action Team,” a

multi-agency group of state agencies, was set up to implement Executive Order S-3-05. Under this order, the State of California plans to reduce GHG emissions to 80 percent below 1990 levels by 2050. GHG emission reduction strategies and measures to reduce global warming were identified by the California Climate Action Team in 2006.

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

AB 32, the Global Warming Solutions Act of 2006, codifies the State of California's GHG emissions target by directing CARB to reduce the state's global warming emissions to 1990 levels by 2020. AB 32 was signed and passed into law by Governor Schwarzenegger on September 27, 2006. Since that time, CARB, CEC, the California Public Utilities Commission (CPUC), and the Building Standards Commission have all been developing regulations that will help meet the goals of AB 32 and Executive Order S-3-05.

A Scoping Plan for AB 32 was adopted by CARB in December 2008. It contains the State of California's main strategies to reduce GHGs from business-as-usual emissions projected in 2020 back down to 1990 levels. Business-as-usual (BAU) is the projected emissions in 2020, including increases in emissions caused by growth, without any GHG reduction measures. The Scoping Plan has a range of GHG reduction actions, including direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system. It required CARB and other state agencies to develop and adopt regulations and other initiatives reducing GHGs by 2012.

As directed by AB 32, CARB has also approved a statewide GHG emissions limit. On December 6, 2007, CARB staff resolved an amount of 427 MMT of CO₂e as the total statewide GHG 1990 emissions level and 2020 emissions limit. The limit is a cumulative statewide limit, not a sector- or facility-specific limit. CARB updated the future 2020 BAU annual emissions forecast, in light of the economic downturn, to 545 MMT of CO₂e. Two GHG emissions reduction measures currently enacted that were not previously included in the 2008 Scoping Plan baseline inventory were included, further reducing the baseline inventory to 507 MMT of CO₂e. Thus, an estimated reduction of 80 MMT of CO₂e is necessary to reduce statewide emissions to meet the AB 32 target by 2020.

Senate Bill 375, California's Regional Transportation and Land Use Planning Efforts (2008)

The State of California enacted legislation (Senate Bill [SB] 375) to expand the efforts of AB 32 by controlling indirect GHG emissions caused by urban sprawl. SB 375 would develop emissions-reduction goals that regions can apply to planning activities. SB 375 provides incentives for local governments and developers to implement new conscientiously planned growth patterns. These include incentives for creating attractive, walkable, and sustainable communities and revitalizing existing communities. The legislation also allows developers to bypass certain environmental reviews under CEQA if they build projects consistent with the new sustainable community strategies. Development of more alternative transportation options that would reduce vehicle trips and miles traveled, along with traffic congestion, would be encouraged. SB 375 enhances CARB's ability to reach the AB 32 goals by directing the agency in developing regional GHG emission reduction targets to be achieved from the transportation sector for 2020 and 2035. CARB works with the metropolitan planning organizations (e.g., Association of Bay Area Governments [ABAG]

and Metropolitan Transportation Commission [MTC]) to align their regional transportation, housing, and land use plans to reduce vehicle miles traveled and demonstrate the region's ability to attain its GHG reduction targets. Plan Bay Area is the Bay Area's first long-range plan to meet the requirements of SB 375.

REGIONAL REGULATIONS

BAAQMD is the regional government agency that regulates sources of air pollution within the nine San Francisco Bay Area counties. BAAQMD regulates GHG emissions through the following plans, programs, and guidelines.

Regional Clean Air Plans

BAAQMD and other air districts prepare clean air plans in accordance with the state and federal Clean Air Acts. The Bay Area 2010 Clean Air Plan (CAP) is a comprehensive plan to improve Bay Area air quality and protect public health through implementation of a control strategy designed to reduce emissions and ambient concentrations of harmful pollutants. The most recent CAP also includes measures designed to reduce GHG emissions. As discussed above, Plan Bay Area is the Bay Area's first long-range plan to meet the requirements of SB 375.

BAAQMD Climate Protection Program

BAAQMD established a climate protection program to reduce pollutants that contribute to global climate change and affect air quality in the San Francisco Bay Area Air Basin. The climate protection program includes measures that promote energy efficiency, reduce vehicle miles traveled, and develop alternative sources of energy, all of which assist in reducing emissions of GHG and in reducing air pollutants that affect the health of residents. BAAQMD also seeks to support current climate protection programs in the region and to stimulate additional efforts through public education and outreach, technical assistance to local governments and other interested parties, and promotion of collaborative efforts among stakeholders.

LOCAL REGULATIONS

The Resource Conservation and Sustainability Element of the *Town of Corte Madera General Plan* contains the following goal, policies, and implementation programs relevant to the GHG impacts of the proposed project:

GOAL RCS-3: Reduce existing and future levels of GHG emissions originating from within the community.

Policy RCS-3.1 Actively seek to reduce greenhouse gas emissions within the Planning Area.

Implementation Program RCS-3.1a: Implement California Air Resources Board Regulations. The Town shall implement regulations adopted by the California Air Resources Board or other applicable regulatory agency to reduce greenhouse gas emissions.

Implementation Program RCS-10.6c: Air Quality Regulations for GHG Emissions. The Town shall implement any regulations issued by the California Air Resources Board or other regulatory agency regarding greenhouse gas emissions. The Town will enforce CEQA Guidelines developed by the Governor's Office of Planning and Research that seek to analyze and mitigate GHG emissions and energy use (see RCS Policy 3.1a).

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Section 15064.4 of the CEQA Guidelines specifically addresses the significance of GHG emissions. This section calls for a "good-faith effort" by the lead agency "to describe, calculate or estimate the amount of GHG emissions resulting from a project." When assessing the significance of impacts from GHGs on the environment, the lead agency should consider the following factors: 1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting, 2) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project, and 3) the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Section 15126.4(c) of the CEQA Guidelines states that, when GHG emissions are found to be significant, lead agencies "shall consider feasible means, supported by substantial evidence and subject to monitoring or reporting, of mitigating the significant effects of GHG emissions." Measures to mitigate the significant effects of GHG emissions may include, among others, 1) measures in an existing plan or mitigation program for the reduction of emissions that are required as part of the lead agency's decision; 2) reductions in emissions resulting from a project through implementation of project features, project design, or other measures; 3) off-site measures, including offsets that are not otherwise required, to mitigate a project's GHG emissions; and 4) measures that sequester GHGs.

SIGNIFICANCE CRITERIA

In accordance with Appendix G of the CEQA Guidelines and BAAQMD recommendations, GHG emissions are considered significant if implementation of the proposed project would:

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

BAAQMD provides lead agencies in the Bay Area with guidance on assessing impacts. In June 2010, BAAQMD adopted thresholds of significance to assist in the review of projects under CEQA. These thresholds were designed to establish the level at which BAAQMD believed air pollution emissions would cause significant environmental impacts under CEQA and were posted on the BAAQMD's website and included in BAAQMD's updated CEQA Guidelines (updated May 2011). The BAAQMD thresholds were developed specifically for the Bay Area after considering the latest Bay Area GHG inventory and the effects of AB 32 scoping plan measures that would reduce regional emissions. BAAQMD intends to achieve GHG reductions from new land use developments to close the gap between projected regional emissions with AB 32 scoping plan measures and the AB 32 targets. The BAAQMD GHG recommendations include a bright-line emissions threshold of 1,100 MT of CO₂e or an emission efficiency metric of 4.6 MT of CO₂e per

year per capita (future residences) if the bright-line threshold is exceeded. Projects that have emissions below 1,100 MT of CO₂e per year, or 4.6 MT of CO₂e per year per capita, are considered to have less-than-significant GHG emissions.

BAAQMD's adoption of significance thresholds contained in the 2011 CEQA Air Quality Guidelines was called into question by an order issued March 5, 2012, in California Building Industry Association (CBIA) v. BAAQMD (Alameda Superior Court Case No. RG10548693). The order required BAAQMD to set aside its approval of the thresholds until it has conducted environmental review under CEQA. The ruling made in the case concerned the environmental impacts of adopting the thresholds and how the thresholds would indirectly affect land use development patterns. In August 2013, the Appellate Court struck down the lower court's order to set aside the thresholds. However, this litigation remains pending as the California Supreme Court recently accepted a portion of CBIA's petition to review the appellate court's decision to uphold BAAQMD's adoption of the thresholds. The specific portion of the case to be considered is in regard to whether CEQA requires consideration of the effects of the environment on a project (as contrasted to the effects of a proposed project on the environment). Scientific information supporting the thresholds was documented in BAAQMD's proposed thresholds of significance analysis (BAAQMD, 2009). Accordingly, the analysis herein uses the thresholds and methodologies from BAAQMD's May 2011 CEQA Air Quality Guidelines to determine the potential impacts of the project on the existing environment.

LESS-THAN-SIGNIFICANT IMPACTS

Generate Greenhouse Gas Emissions

The project's operational GHG emissions would be considered less than significant. The California Emissions Estimator Model Version 2013.2.2 (CalEEMod) was used to predict GHG emissions from construction and operation of the project. The model predicts emissions of GHGs in the form of CO₂e. The project land use types and sizes, trip generation rates, and other project-specific information were input to the model. The use of this model for evaluating emissions from land use projects is recommended by BAAQMD. Unless otherwise noted below, the CalEEMod model defaults for Marin County were used. CalEEMod provides emissions for transportation, areas sources, electricity consumption, natural gas combustion, electricity usage associated with water usage and wastewater discharge, and solid waste land filling and transport. CalEEMod output data are included in **Appendix G**.

The model uses mobile emission factors from CARB's EMFAC2011 model. This model is sensitive to the year selected since vehicle emissions have been and continue to be reduced due to fuel efficiency standards and low carbon fuels. Adjustments to the modeling are described below.

Operational Emissions

Land Use Descriptions

The proposed project land use was input to CalEEMod as 187 rooms entered as "Hotel" and 257 parking lot spaces. An "existing" model was also run with 110 rooms entered as "Hotel" and 188 parking lot spaces.

Year of Analysis

Emissions associated with vehicle travel depend on the year of analysis. The earlier the year, the higher the emission rates as CalEEMod uses CARB's EMFAC2011 motor vehicle emissions model. This model assumes reduced emission rates as newer vehicles with lower emission rates replace older, more polluting vehicles through attrition of the overall vehicle fleet.

The earliest full year the project could be possibly constructed and fully operated was assumed to be 2017. Use of this early date is considered conservative, as emissions associated with build-out later than 2017 would be lower. Existing GHG emissions were also estimated for 2014 to determine the net increase due to implementation of the proposed project.

Trip Generation Rates

CalEEMod allows the user to enter specific trip generation rates. Parisi Transportation Consulting, the EIR transportation consultant, provided existing and future trip generation rates for the project. Trip generation represents the daily number of trips generated when the land use is fully operational.

Energy Usage

Default rates for energy consumption were assumed in the model. Emissions rates associated with electricity consumption were adjusted to account for Pacific Gas & Electric (PG&E) projected future CO₂ intensity rates. These rates are based, in part, on the requirement of a renewable energy portfolio standard of 33 percent by the year 2020. CalEEMod uses a default rate of 641 pounds of CO₂ per megawatt of electricity produced that is based on PG&E's 2008 certified rate. The derived 2017 rate for PG&E was estimated at 348.86 pounds of CO₂ per megawatt of electricity delivered and is based on the California Public Utilities Commission (CPUC) GHG Calculator (CPUC, 2010). The derived 2014 rate was estimated at 412.35 pounds of CO₂ per megawatt of electricity delivered.

Calculation of Project Operational Emissions

Table 4.6-1 lists estimated operational emissions for the project. As shown in Table 4.6-1, the project would also include installation of one 80 kilowatt (kW) emergency back-up diesel generator. The generator would be located near the northwest corner of the property. The new generator would use a diesel engine that meets the EPA Tier 4 off-road diesel emission standards. DPM emissions (assumed to be the same as PM_{2.5} emissions) were calculated assuming use of a Tier 4 diesel engine with operation of 50 hours per year, the maximum allowed by BAAQMD for periodic testing and maintenance of emergency generators.

Conclusion

As shown in Table 4.6-1, net project emissions would not exceed the GHG emissions bright-line threshold of 1,100 MT of CO₂e per year. As a result, the project's operational GHG emissions would be considered *less than significant*. Modeling output that includes assumptions is provided in **Appendix E**.

TABLE 4.6-1 PROJECT OPERATIONAL GREENHOUSE GAS EMISSIONS

	GHG Emissions (MT of CO ₂ e)	
	Existing (2014)	Project Operation (2017)
Area	<1	<1
Energy	385	470
Mobile	499	1,129
Waste	27	47
Water	7	10
Project Back-Up Generator	-	4
Total Emissions in Metric Tons Per Year	919	1,661
Net Project Emissions		742
BAAQMD Threshold		1,100
<i>Project Emissions Exceed Threshold?</i>		<i>No</i>

Note: GHG = greenhouse gas, CO₂e = carbon dioxide equivalents, MT = metric tons, BAAQMD = Bay Area Air Quality Management District
Source: Illingworth & Rodkin, 2014

Construction Emissions

The projected construction GHG emissions would be less than the annual operational threshold of 1,100 MT of CO₂e and this impact would be considered less than significant. Total GHG emissions in the form of CO₂e from project construction were calculated, including both on-site and off-site activities, as well as the proposed sewer line along Monona Drive. On-site activities would consist of the operation of off-road construction equipment, and off-site activities would include trips by trucks hauling materials from building demolition as well as vendor and worker trips. Emissions from proposed construction activities were calculated by using the CalEEMod model, along with the project construction schedule.

Schedule, Phases, and Equipment

A construction build-out scenario, including equipment list and phasing schedule, was provided by the project applicant. Approximately 21,403 cubic yards of soil/material import would be required. In addition, the anticipated 15,819 tons of building and pavement demolition material were entered into the model, along with approximately 648 cement truck trips needed during building construction. The modeling scenario assumes that the project would be built out over a period of approximately 15 months beginning in September 2015 and ending in December 2016. CalEEMod input and output worksheets are provided in Appendix E.

Calculation of Project Construction Emissions

Total construction CO₂e emissions were calculated to be 604 MT of CO₂e.

Conclusion

Neither BAAQMD nor the Town of Corte Madera has established a quantified threshold for construction-period GHG emissions. However, projected construction GHG emissions would be less than the annual operational threshold of 1,100 MT of CO₂e and this impact would be considered less than significant.

Conflict with Applicable Plans, Policies, or Regulations Adopted for the Purpose of Reducing GHG Emissions

The proposed project would not conflict with plans or policies related to the reduction of GHG emissions. The adopted AB 32 Scoping Plan includes proposed GHG reductions from direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as cap-and-trade systems. The project would be subject to all applicable permit and planning requirements in place or adopted by the State of California or the Town of Corte Madera.

POTENTIALLY SIGNIFICANT IMPACTS

The project would not result in any potentially significant GHG impacts.

CUMULATIVE IMPACTS

Pursuant to CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including plans or regulations for the reduction of GHGs) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. The significance thresholds applicable to the project represent the levels at which a project's individual emissions of GHGs would result in a cumulatively considerable contribution to overall GHG emissions in the Bay Area as determined by BAAQMD. This approach recognizes the GHG emissions worldwide are cumulatively significant. Therefore, this GHG analysis considers cumulative impacts as part of the analysis. Therefore, no additional cumulative impacts have been identified and no mitigation measures would be required.

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