

A-5: Lake Forest Warehouse Supplemental Greenhouse Gas & Energy Memorandum

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TO: Jennifer Mansur, City of Lake Forest
FROM: Haseeb Qureshi
JOB NO: 14042-08 GHG & EA Memo

LAKE FOREST WAREHOUSE SUPPLEMENTAL GHG & ENERGY MEMO

Jennifer Mansur,

Urban Crossroads, Inc. is pleased to provide the following supplemental GHG & Energy Memo for the lake forest warehouse (**Project**), which is located 26200 Enterprise Way in the City of Lake Forest.

PURPOSE

The purpose of this supplemental assessment is to evaluate the Project's consistency with the 2022 Scoping Plan for Achieving Carbon Neutrality (**2022 Scoping Plan**) and to provide an update to the Integrated Energy Policy Report (IEPR).

2022 SCOPING PLAN SUMMARY

On December 15, 2022, CARB adopted the 2022 Scoping Plan (1). The 2022 Scoping Plan builds on the 2017 Scoping Plan as well as the requirements set forth by AB 1279, which directs the state to become carbon neutral no later than 2045. To achieve this statutory objective, the 2022 Scoping Plan lays out how California can reduce GHG emissions by 85% below 1990 levels and achieve carbon neutrality by 2045. The Scoping Plan scenario to do this is to “deploy a broad portfolio of existing and emerging fossil fuel alternatives and clean technologies, and align with statutes, Executive Orders, Board direction, and direction from the governor.” The 2022 Scoping Plan sets one of the most aggressive approaches to reach carbon neutrality in the world.

Included in the 2022 Scoping Plan is a set of Local Actions (Appendix D to the 2022 Scoping Plan) aimed at providing local jurisdictions with tools to reduce GHGs and assist the state in meeting the ambitious targets set forth in the 2022 Scoping Plan. Appendix D to the 2022 Scoping Plan includes a section on evaluating plan-level and project-level alignment with the State's Climate Goals in CEQA GHG analyses. In this section, CARB identifies several recommendations and strategies that should be considered for new development in order to determine consistency with the 2022 Scoping Plan.

Notably, this section is focused on Residential and Mixed-Use Projects, in fact CARB states in Appendix D (page 4): "...focuses primarily on climate action plans (CAPs) and local authority over new residential development. It does not address other land use types (e.g., industrial) or air permitting."

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

2022 SCOPING PLAN CONSISTENCY

The Project would not impede the State's progress towards carbon neutrality by 2045 under the 2022 Scoping Plan. The Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the Project will comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, In-use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer rule, Clean Off-Road Fleet Recognition Program, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard.

2022 INTEGRATED ENERGY POLICY REPORT

The 2022 IEPR was adopted February 2023, and continues to work towards improving electricity, natural gas, and transportation fuel energy use in California. The 2022 IEPR introduces a new framework for embedding equity and environmental justice at the CEC and the California Energy Planning Library which allows for easier access to energy data and analytics for a wide range of users. Additionally, energy reliability, western electricity integration, gasoline cost factors and price spikes, the role of hydrogen in California's clean energy future, fossil gas transition and distributed energy resources are topics discussed within the 2022 IEPR (2). The 2022 IEPR released by the CEC has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements (2). As supported by the analysis

in the Energy Report, Project energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

REFERENCES

1. **California Air Resources Board.** *2022 Scoping Plan for Achieving Carbon Neutrality.*
2. **California Energy Commission Staff.** 2022 Integrated Energy Policy Report Update. [Online] 2022. https://www.energy.ca.gov/sites/default/files/2023-02/Adopted_2022_IEPR_Update_with_errata_ada.pdf.