previously adopted mitigation program, or plan for the reduction of GHG emissions that includes the following elements:

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

The City's ECAP, adopted in 2013, provides a set of strategies and supporting actions for achieving the City's 2020 GHG reduction targets, but it does not demonstrate how the City plans to reduce GHG emissions consistent with the State's post-2020 targets as represented by SB 32 and EO S-3-05.

CARB's 2017 Scoping Plan Update advises that absent conformity with a qualified GHG reduction plan, projects should incorporate all feasible GHG reduction measures and that achieving "no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development."[63] Accordingly, for the purposes of this EIR, the City used a quantitative threshold for the Proposed Project of no net additional GHG emissions, including emissions from employee transportation.

The "no net new" emissions threshold means that if the Proposed Project would not emit any additional GHG emissions beyond the baseline over its estimated 30-year life, the impact would be less than significant. Further, the "no net new" emissions threshold for the Proposed Project is consistent with the project applicant's commitment to abide by the requirements of AB 987, which stipulates that the Proposed Project would not result in any net additional emissions of GHGs compared to the baseline, including GHG emissions from employee transportation. This threshold serves as a *project-specific* GHG threshold and does not set precedent for future City projects.[64]

Consistent with CEQA Guidelines Appendix G, the City is also assessing whether the Proposed Project would be inconsistent with applicable plans, policies, regulations or requirements adopted to implement a statewide, regional or local plan for the reduction of GHG emissions.

63 California Air Resources Board, 2017. *California's 2017 Climate Change Scoping Plan*. pp. 100-101.Available: www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf. Accessed March 10, 2019. November 2017.

64 Project-specific thresholds are not required to be formally adopted because the requirement for formal adoption of thresholds under 14 CCR §15064(b) applies only to thresholds of general application.

Determining Net New Emissions of Greenhouse Gases

The net new GHG emissions associated with the Proposed Project is defined as the difference in emissions between baseline conditions and the Proposed Project buildout. Baseline operational emissions are the annual operational GHG emissions produced by existing emissions sources and activities against which the Proposed Project's GHG emissions will be compared. The Proposed Project's operational emissions would occur starting in 2024 and for analytical purposes are assumed to continue through the 30-year life of the Proposed Project to 2054.

For the purpose of this analysis, the Proposed Project's annual operational emissions include total construction emissions amortized over the 30-year life of the Proposed Project, consistent with regulatory guidance from SCAQMD and with the typical average lifespan of past NBA arenas. SCAQMD recognizes that construction-related GHG emissions from projects "occur over a relatively short-term period of time" and that "they contribute a relatively small portion of the overall lifetime project GHG emissions." SCAQMD recommends that construction project GHG emissions be "amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies."[65]

Project Consistency with Existing Plans, Policies and Regulations

A significant impact would occur if the Proposed Project would conflict with applicable regulations, plans and policies that were adopted to reduce GHG emissions that contribute to global climate change. For the Proposed Project, as a land use development project, this analysis considers the Proposed Project's consistency with the following applicable plans, policies and regulations to reduce GHG emissions:

- The 2017 Climate Change Scoping Plan Update, CARB's plan for achieving a 40 percent reduction on GHG emissions from 1990 levels by 2030, statewide, as mandated by SB 32;
- SCAG's 2016-2040 RTP/SCS, the regional plan for achieving sustainable land use patterns that reduce passenger vehicle GHG emissions, as mandated by SB 375;
- Executive Order S-3-05, which established a goal of reducing the state's GHG emissions to 80 percent below the 1990 level by the year 2050;
- CARB's Mobile Source Strategy and Executive Order B-48-18, which are designed to achieve GHG reductions from the state's largest contributing sector (transportation), consistent with the goals of SB 32 and the 2017 Scoping Plan Update; and
- The City's ECAP.

Methodology and Assumptions

For the purpose of this analysis, baseline annual emissions include GHGs from mobile sources and energy usage resulting from the existing on-site structures that would be removed and replaced with construction of the Proposed Project, as well as the emissions from all of the LA

[65] South Coast Air Quality Management District, 2008. Draft Guidance Document – Interim CEQA Greenhous Gas (GHG) Significance Threshold. Available: www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf. Accessed March 11, 2019. October 2008, pp. 3-8.

Clippers games at the Staples Center, and non-NBA events that would be "market-shifted" to the proposed Arena, as described below.

As described in Chapter 2, Project Description, this analysis assumed that an annual average of 5 pre-season, 41 regular season, and 3 post-season LA Clippers home games would be hosted at the proposed Arena (see Table 2-3), for an average of 49 games per year. The annual average number of post-season games was based on the average number of post-season home games per NBA team per year. **Table 3.7-4** provides a summary of annual events anticipated at the proposed Arena, along with estimates of the number of events that would be market-shifted from other venues within the Los Angeles region. These include the LA Clippers games currently being played at Staples Center, and non-NBA game events (e.g., concerts, family shows, non-NBA sports games, etc.) currently occurring at other arenas in the Los Angeles region, which would be relocated to the Project Site. The effect of the Proposed Project would be to shift the location where some of these events currently occur. For this reason, the market-shifted events were considered part of the Proposed Project baseline conditions.[66]

Further, the move of LA Clippers games out of Staples Center would provide some additional open dates in the Staples Center calendar, and it is reasonable to assume that the operator of Staples Center would attempt to book events for those newly available dates. The primary dates that would be made available would be weekday and weekend evenings when no other professional sports team event is occurring. Based on evaluation of the past several years of Staples Center schedules, the analysis assumed that seven events would be backfilled at the Staples Center.

As described in Appendix K, in addition to the 47 Clippers games relocated to the new Arena, it was assumed that additional events from the wider region would be "market-shifted" to the Arena. These additional market-shifted events include an average of 10 large events (e.g., concerts) defined as having an average of 12,000 or more attendees; 38 medium-size events with between 5,000 and 10,000 attendees; and 41 small events with less than 5,000 attendees.

The Proposed Project would include relocation of the existing off-site LA Clippers team offices, which are located approximately 11 miles northeast of the Project Site at 1212 South Flower Street in downtown Los Angeles, and the existing off-site LA Clippers practice and athletic training facility, which is located approximately 6 miles northwest of the Project Site at 6854 South Centinela Avenue in the Playa Vista neighborhood within Los Angeles. GHG emissions associated with the use of the existing team offices and the practice and athletic training facility (including travel to and from) are currently occurring, and are therefore arguably part of the existing environmental setting. GHG emissions associated with the use of the existing team offices and the practice and athletic training facility would be relocated to the Project site and are thus included in "baseline" GHG emissions. However, it is likely that the facilities would be

66 The incremental VMT that would be associated with relocating these events to the project site is accounted for in the Proposed Project's operational emissions.

Innovation. The Proposed Project would be eligible for innovation credits. Innovative strategies include the following: implementation of the FanFirst/Occupant Comfort Survey,[90] green education program, LEED Operations + Management (O+M) Starter Kit (Pest Management and Green Cleaning Program), and the purchasing of 100 percent LED lamps.

Impacts and Mitigation Measures

Impact 3.7-1: Construction and operation of the Proposed Project could generate "net new" GHG emissions, either directly or indirectly, that could have a significant impact on the environment. (Less Than Significant with Mitigation)

As noted above the Proposed Project's baseline emissions are the annual operational GHG emissions produced by existing conditions and activities against which the Proposed Project's GHG emissions are compared, which include existing on-site structures that would be removed and replaced with construction of the Proposed Project as well as the operational emissions associated with events that would be market-shifted from existing venues in the Los Angeles region, including the LA Clippers games.

Existing Emissions

Table 3.7-6 presents total annual GHG emissions by source representing the existing conditions (2018).

TABLE 3.7-6
EXISTING CONDITIONS (2018) – TOTAL ANNUAL GHG EMISSIONS BY SOURCE AND CATEGORY ($MTCO_2E$)

Category	Existing On-Site[a]	Existing Off-Site[b]	Total Existing
Mobile	835	962	1,797
Electricity	127	293	420
Natural Gas	85	59	144
Water and Wastewater	9	3	12
Solid Waste	62	17	79
Area Sources (Landscaping)	<1	<1	<1
Total[c]	**1,119**	**1,333**	**2,452**

NOTES:
[a] Emissions from existing on-site operations that would be removed.
[b] Emissions from existing off-site operations associated with the LA Clippers' team business operations and the LA Clippers' practice and athletic training facility.
[c] Due to rounding, emissions from individual sectors may not add up to exact total.

SOURCE: ESA, 2019. See Appendix G.

Construction Emissions

Table 3.7-7 presents the total annual GHG emissions from construction of the Proposed Project by calendar year over the duration of the construction schedule.

[90] FanFirst Connected Comfort utilizes real time crowdsourced feedback during an event to adjust temperature in the arena bowl to increase fan comfort and reduce over cooling/wasted energy.

TABLE 3.7-8
ANNUAL OPERATIONAL GHG EMISSIONS AT FIRST FULL YEAR OF OPERATIONS (2025)

Category	CO_2e Emissions (MT/year)
Mobile	18,233
Electricity	2,811
Natural Gas	1,270
Water and Wastewater	55
Solid Waste	432
Area Sources (Landscaping)	<1
Emergency Generators	71
Cooling Tower	11
Media Van Generators	24
Electric Off-Road Equipment	8
Delivery Trucks (TRU Exhaust and Idling)	13
Construction Emissions[a]	603
Total[b]	**23,530**

NOTES:
[a] Construction emissions amortized over a period of 30 years per SCAQMD guidance.
[b] Due to rounding, emissions from individual sectors may not exactly add up to total.

SOURCE: ESA, Appendix G.

Net New Emissions

Table 3.7-9 presents annual net new annual GHG emissions by source over the 30-year lifetime of the Proposed Project (2024 through 2054). The baseline for determining net new emissions includes existing emissions (as summarized in Table 3.7-6), as well as events that would be "market-shifted" to the proposed Arena. As summarized in Table 3.7-4, market-shift events would include 47 annual LA Clippers games that currently occur at Staples Center and 89 annual non-NBA events that currently occur at other existing venues in the Los Angeles region. As indicated in Table 3.7-9, the Proposed Project net new GHG emissions for the first full year of operation in 2025 would be approximately 14,439 $MTCO_2e$ per year. By the year 2054, annual net new emissions would be reduced to approximately 9,926 $MTCO_2e$ per year, due to anticipated improvements in vehicle fuel efficiency and lower GHG intensity of the electricity supply.

TABLE 3.7-9
PROPOSED PROJECT TOTAL NET NEW GHG EMISSIONS (MT CO_2e/YEAR)

Year	Operational[a]	Existing[b]	Backfilled[c]	Relocated LA Clippers Games and Market-Shifted[d]	"Net New"[e]
2024[f]	12,149	(1,050)	806	(4,457)	7,448
2025	23,530	(2,038)	1,560	(8,613)	14,439
2026	22,840	(1,982)	1,513	(8,344)	14,027
2027	22,206	(1,929)	1,470	(8,100)	13,646
2028	21,623	(1,880)	1,429	(7,879)	13,293

AMC/96th Street Station, and Crenshaw/LAX Line at La Brea/Florence (Downtown Inglewood) Stations for arena events. This shuttle service shall be a dedicated event-day shuttle service from the venue for employees and attendees.

- *The IBEC Project shall provide no less than 27 shuttles with a capacity of no less than 45 persons per shuttle to accommodate employees and attendees traveling to and from the Project Site. Due to the arrival and departure of employees prior to the attendees, the same shuttles shall be utilized for the employees. Shuttle service shall begin no less than two hours before the event and extend to at least 30 minutes after the start of the event. After the event, shuttle service shall begin no less than 30 minutes before the end of the event and shall continue for at least one hour after the end of the event.*
- *The IBEC Project shall implement Mitigation Measure 3.14-2(b), requiring the IBEC operator to provide enough shuttles to ensure that there is successful and convenient connectivity with short wait times to these light rail stations. To this end, the IBEC operator will monitor the number of people using shuttles to travel between the above light rail stations and the IBEC. If the monitoring shows that peak wait times before or after major events exceeds 15 minutes, then the IBEC operator must add enough additional shuttle runs to reduce wait times to meet this target. The aim is to require increased shuttle runs as necessary to make sure that demand is accommodated within a reasonable amount of time and to encourage use of transit.*
- *The IBEC Project shall provide a convenient and safe location on site for shuttle pick-up and drop-off on the east side of South Prairie Avenue, approximately 250 feet south of West Century Boulevard. The drop-off location shall be adjacent to the arena so that shuttle users would not need to cross South Prairie Avenue to arrive at the arena. The IBEC Project shall implement Mitigation Measure 3.14-3(f), which requires constructing a dedicated northbound right-turn lane that would extend from the bus pull-out on the east side of South Prairie Avenue to West Century Boulevard.*

iii. *TDM 3 – Encourage Carpools and Zero-Emission Vehicles*

The IBEC Project shall provide incentives to encourage carpooling and zero-emission vehicles as a means for sharing access to and from the Project Site. The incentives shall include:

- *Incentives for carpools or zero-emission vehicles, including preferential parking with the number of parking spots in excess of applicable requirements, reduced parking costs, discounted rides (or other, similar benefits) to incentivize sharing/pooling for attendees using transportation network company (TNC) rides to or from an event, or other discounts/benefits.*

design features that encourage and support the use by employees, event attendees and customers of alternative modes of transportation and the reduction of vehicle trips, including by increasing average vehicle occupancy. The program is designed to be consistent with the requirements and achieve the reduction in vehicle trips set forth in AB 987 and would be required under Mitigation Measure 3.14-2(b). The Proposed Project TDM Program would include the following components: encourage alternative modes of transportation (rail, public bus, and vanpool); provide event-day dedicated shuttle services; encourage carpools and zero-emission vehicles; encourage active transportation; implement an employee vanpool program and a park-n-ride program; provide alternative transportation information services; reduce on-site parking demand; and provide event-day local microtransit service.

(including TDM Program elements included in the proposed Project)

The TDM program is designed to achieve and maintain a 15 percent reduction in the number of vehicle trips, on an annual basis, by attendees, employees, visitors, and customers as compared to trips generated by Project operations absent the TDM program. Pursuant to SB 987, the measures included in the Proposed Project TDM program must be implemented so that a 7.5 percent reduction in vehicle trips is achieved and maintained by the end of the first NBA season during which an NBA team has played at the Arena, anticipated to occur by June 2025. A 15 percent reduction in vehicle trips must be achieved no later than January 1, 2030. This requirement directly supports SCAG's 2035 target of reducing per-capita VMT 18 percent reduction by 2035.The reduction in trips achieved under the Proposed Project TDM program would reduce GHG emissions from Project-related transportation.

In addition, as described above and in Section 3.14, Transportation and Circulation, the TDM Program would encourage active transportation and alternative modes of travel. For example, the Proposed Project would include 23 spectators and 60 employee on-site bicycle parking spaces, which would exceed the bicycle parking requirements established in Municipal Code Chapter 12, Article 19, section 12-42.1. To promote pedestrian travel, the Proposed Project would include improvements to the sidewalks fronting the Project Site and a pedestrian bridge crossing South Prairie Avenue to promote a safe pedestrian circulation system and would provide high-capacity pedestrian pathways. In addition, the Proposed Project would include provisions that would promote the use of public transportation as a means of travel to and from the Arena, including a transportation hub at the East Transportation and Hotel Site, shuttle stops on South Prairie Avenue, and a shuttle system for large events that would connect the Proposed Project to nearby Metro stations. This would further support Goal 6 of the RTP/SCS.

Goal 7 of the 2016 RTP/SCS aims to actively encourage and create incentives for energy efficiency. As discussed above under *Project Design Features*, the Proposed Project would utilize energy efficiency appliances and equipment, as required by Title 24, and it would provide EV charging stations to support the future use of electric and hybrid-electric vehicles by employees and visitors traveling to and from the Project Site. In addition, the Proposed Project would be designed and constructed to meet LEED Gold certification requirements, which would require the incorporation of energy efficiency measures. The Proposed Project would comply with Title 24 energy efficiency requirements, use of 100 percent LED lighting indoors and outdoors throughout

associated with its modeling assumptions, the PATHWAYS study emphasizes the need for significant action and continued policy development by the State to support low-carbon technologies and markets for energy efficiency, building electrification, renewable electricity, zero emission vehicles, and renewable liquid fuels. The study underscores the need for a periodic review of State policies and programs for reducing GHG emissions, as was anticipated by AB 32 in its directive to update the Scoping Plan at least every 5 years.

A 2018 update to the PATHWAYS study advanced the understanding of what is required for technology deployment and other GHG mitigation strategies if California is to meet its long-term climate goals. The 2018 study concludes that to achieve high levels of consumer adoption of zero-carbon technologies, particularly of electric vehicles and energy efficiency and electric heat in buildings, market transformation is needed to reduce the capital cost and to increase the range of options available. This market transformation can be facilitated by (1) higher carbon prices (which can be created by the Cap and Trade and LCFS programs); (2) codes and standards, regulations and direct incentives, to reduce the upfront cost to the customer; and (3) business and policy innovations to make zero-carbon technology options the cheaper, preferred solutions compared to fossil fueled alternatives.[96]

Statewide efforts are underway to facilitate the achievement of the EO S-3-05 goals. It is reasonable to expect the Proposed Project GHG emissions to decline over time, as shown in Table 3.7-9, as the regulatory initiatives identified by CARB in the 2017 Scoping Plan Update are implemented, and other technological innovations occur. Given the reasonably anticipated decline in Proposed Project emissions, the Proposed Project would not conflict with or frustrate the ability of the State to achieve the 2050 horizon-year goal of EO S-3-05.

Mobile Source Strategy and Executive Order B-48-18

State goals for ZEVs are expressed in the Advanced Clean Cars Initiative (ACC) and the ZEV mandate established by Governor's Executive Order B-16-1, which sets a target of reaching 1.5 million ZEVs (meaning battery electric vehicles and fuel cell electric vehicles) and plug-in hybrid electric vehicles on California's roadways by 2025.

According to EMFAC2017, which incorporates the State ZEV mandate, there will be approximately 31,700,000 passenger cars and light trucks on the road in California by 2030, at which time 1.5 million ZEVs would constitute approximately 4.7 percent of all vehicles.[97] The more aggressive Mobile Source Strategy, included in the 2017 Scoping Plan Update as a component

[96] Energy + Environmental Economics (E3), 2018. *Deep Decarbonization in a High Renewables Future. Updated Results from the California PATHWAYS Model.* Available: https://www.ethree.com/wp-content/uploads/2018/06/Deep_Decarbonization_in_a_High_Renewables_Future_CEC-500-2018-012-1.pdf. Accessed March 18, 2019. June 2018.

[97] EMFAC2017 estimates the future percentage of the state's ZEVs based on compliance with the State's ZEV mandate. EMFAC2017's forecasted ZEV population for 2030 is approximately 3.6 percent of all passenger and light duty vehicles, but the 3.6 percent figure represents the equivalent percentage of all vehicles operating as a pure zero emission vehicle (e.g., 100 percent battery electric), whereas the actual population would include PHEVs that operate partially on fossil fuels.