



PROPOSAL FOR SERVICES

October 30, 2008

Ms. Elaine Chang, Dr. P.H., Deputy Executive Officer
Mr. Steve Smith, PhD., Program Supervisor
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: Draft Guidance Document—Interim CEQA Greenhouse Gas (GHG) Significance Threshold

Dear Dr. Chang and Dr. Smith:

Urban Crossroads, Inc. (UC) is a consulting firm that represents developers, and municipal agencies in addressing CEQA-level transportation, air quality, climate change, and acoustical needs. Many of our clients have significant operations in Southern California, and particularly in the South Coast Air Basin.

UC appreciates the continued opportunity to participate in the South Coast Air Quality Management District's (SCAQMD's) California Environmental Quality Act (CEQA) Greenhouse Gas (GHG) Significance Threshold Working Group for the past six (6) meetings and also appreciates the opportunity to provide written comments for the SCAQMD's consideration.

The Working Group has made great progress in the past six (6) meetings. We applaud the SCAQMD and the Working Groups effort and would like to commend them for attempting to address this challenging topic. While the SCAQMD and Working Group have come up with excellent ideas and ultimately the Draft Guidance Document, there is still additional work that needs to be done before the final work product is complete.

The following comments serve to strengthen the SCAQMD's guidance document:

COMMENT 1

The Staff Proposal recommends a different "threshold" for Industrial Projects (10,000 MT/year CO₂eq) and Commercial/Residential (3,000 MT/year CO₂eq).

From a land use and transportation planning perspective, Industrial Projects often encompass Light-Industrial projects, or Business Park/Warehouse projects.

The Institute of Transportation Engineers (ITE), Trip Generation Handbook 7th Edition Volume 2 (ITE 2003) includes the following land uses under the umbrella heading of "Industrial":

- General Light Industrial
- General Heavy Industrial

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- Industrial Park
- Manufacturing
- Warehousing
- High-Cube Warehouse
- Utilities

It is our understanding that land uses such as an Industrial Park or Warehousing use would not fall under the SCAQMD's definition of "Industrial Projects" and would thus be held to the same significance standard as Commercial/Residential projects (3,000 MT/year CO₂eq).

It is our recommendation that SCAQMD Staff and the Draft Guidance Document explicitly define what land uses would be considered "Industrial" versus "Commercial/Residential."

COMMENT 2

Based on the Draft Guidance Document (Table 3-3) and discussion presented in the Draft Guidance Document on Page 4-6 it appears that the "weighted trip average" for the various land uses considered were modeled using the upper-bound Range of Rates as presented in the ITE's Trip Generation Handbook (Handbook). It is unclear as to what rationale was utilized in selecting the upper-bound number from the Range of Rates when computing the weighted trip average.

For example, the weighted trip average for Single-Family Detached Housing (ITE Code 210) as presented in the SCAQMD's Draft Guidance Document is based on the upper-bound "Range of Rates" for the Weekday (21.85), Saturday (15.25), and Sunday (12.31). These rates in some cases are more than double the Average Rates presented in the Handbook e.g., Weekday (9.57), Saturday (10.10), and Sunday (8.78) Rates.

Since the ITE Rates provide Average Daily Rates for the Weekday, Saturday, and Sunday these should be used as a composite to determine a weighted trip average for use in modeling and appear to be more applicable than using the upper-bound maximum numbers that are currently employed.

COMMENT 3

Table 3-3 attempts to illustrate the Metric Tons of CO₂ emitted from various land use projects utilizing the URBEMIS 2007 emissions inventory model. Although the URBEMIS 2007 emissions inventory model is a valuable and important tool—it should be noted that the URBEMIS 2007 emissions inventory model is not intended for, and therefore does not include, greenhouse gas (GHG) emissions related to: water usage (embodied energy), energy consumption, and solid waste disposal.

The State of California Governor's Office of Planning and Research (OPR), in their Technical Advisory document: *CEQA AND CLIMATE CHANGE: Addressing Climate Change Through California Environmental Quality Act (CEQA)* explicitly state that when considering GHG emissions:

- *"Lead agencies should make a good-faith effort, based on available information, to calculate, model, or estimate the amount of CO₂ and other GHG emissions from a project, including the emissions associated with **vehicular traffic, energy consumption, water usage and construction activities.**"*

In light of OPR's Technical Advisory document it would be prudent for the SCAQMD and the Working Group to further investigate and assess the inclusion of emissions related to vehicular traffic in

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developing the industrial threshold and energy consumption and water usage for developing the Industrial, Commercial, and Residential thresholds.

It is also extremely important to note that the supporting Table 3-3 is a summary of a project's CO2 emissions and *NOT* a summary of a project's CO2eq emissions. It appears arbitrary that the threshold of CO2eq is based on supporting analysis and calculations (Table 3-3) that consider *ONLY* CO2 emissions.

I would also like to reiterate comments that have been made at each Working Group meeting that it is also prudent for the SCAQMD to consider the development of a sub-committee focused on developing an appropriate methodology for inventorying GHG emissions for CEQA projects. It is crucial that there be consistency with respect to the methodology employed in calculating a project's GHG emissions, so that lead agencies can ensure significance determinations have some level of consistency.

COMMENT 4

Lastly, although the SCAQMD and Working Group have made significant progress in the development of the interim threshold at each meeting, SCAQMD Staff and the Working Group may require additional time to respond to and address the aforementioned concerns.

Following the November 20th working group meeting SCAQMD Staff and the Working Group may not have adequate time to address the extent of these and other comments prior to the Governing Board Meeting on December 5th, 2008. For this reason it is recommended that the SCAQMD reconsider taking Staff's recommendation to the Governing Board on a date after December 5th, 2008.

If you have any questions, please contact me directly at (949) 660-1994, extension 217.

Respectfully submitted,

URBAN CROSSROADS, INC.



Haseeb Qureshi
Senior Air Quality Specialist

AE:HQ

JN: SCAQMD GHG Comments

CC: Michael Krause, SCAQMD CEQA Section
James Koizumi, SCAQMD CEQA Section