

Greenhouse Gas CEQA  
Significance Threshold  
Stakeholder Working Group #7

November 20, 2008

SCAQMD

Diamond Bar, California

# Overview

- Recent comments on staff's proposed interim GHG significance threshold proposal
- Staff's recommended proposal to be considered by the Governing Board in December
- Comparison with CARB's GHG proposal
- SCAQMD resource impacts
- Implementation & future activities

# Staff-Recommended Proposal to the Board

- Policy objective: capture at least 90% of GHG emissions in the district
- Applicability: stationary (industrial) sources when SCAQMD is the lead agency
  - ✓ Discretionary permit projects where SCAQMD has primary approval authority
  - ✓ SCAQMD rules, regulations or Plans, e.g., AQMP

# Staff-Recommended Proposal to the Board (Cont.)

- Determining significance using a tiered approach
  - ✓ Tier 1: Applicable CEQA Exemptions
    - E.g., SB 97, categorical & statutory exemptions
  - ✓ Tier 2: Consistent with GHG reduction plan (§§15064(h)(3), 15125(d), or 15152(a))
  - ✓ Tier 3: < or mitigated to < 10,000 MTCO<sub>2</sub>eq/yr
  - ✓ Tier 4: Not recommended at this time
  - ✓ Tier 5: Off-site mitigation for life of project (30 years)

# Staff-Recommended Proposal to the Board (Cont.)

- GHG emission source categories to be included in GHG analysis
  - ✓ Direct – on-site construction (amortized over 30 years), stationary sources, etc.
  - ✓ Indirect – offsite transportation, energy production, water conveyance, etc.
  - ✓ Life cycle emissions, e.g., production and transport of materials, equipment, etc., to California

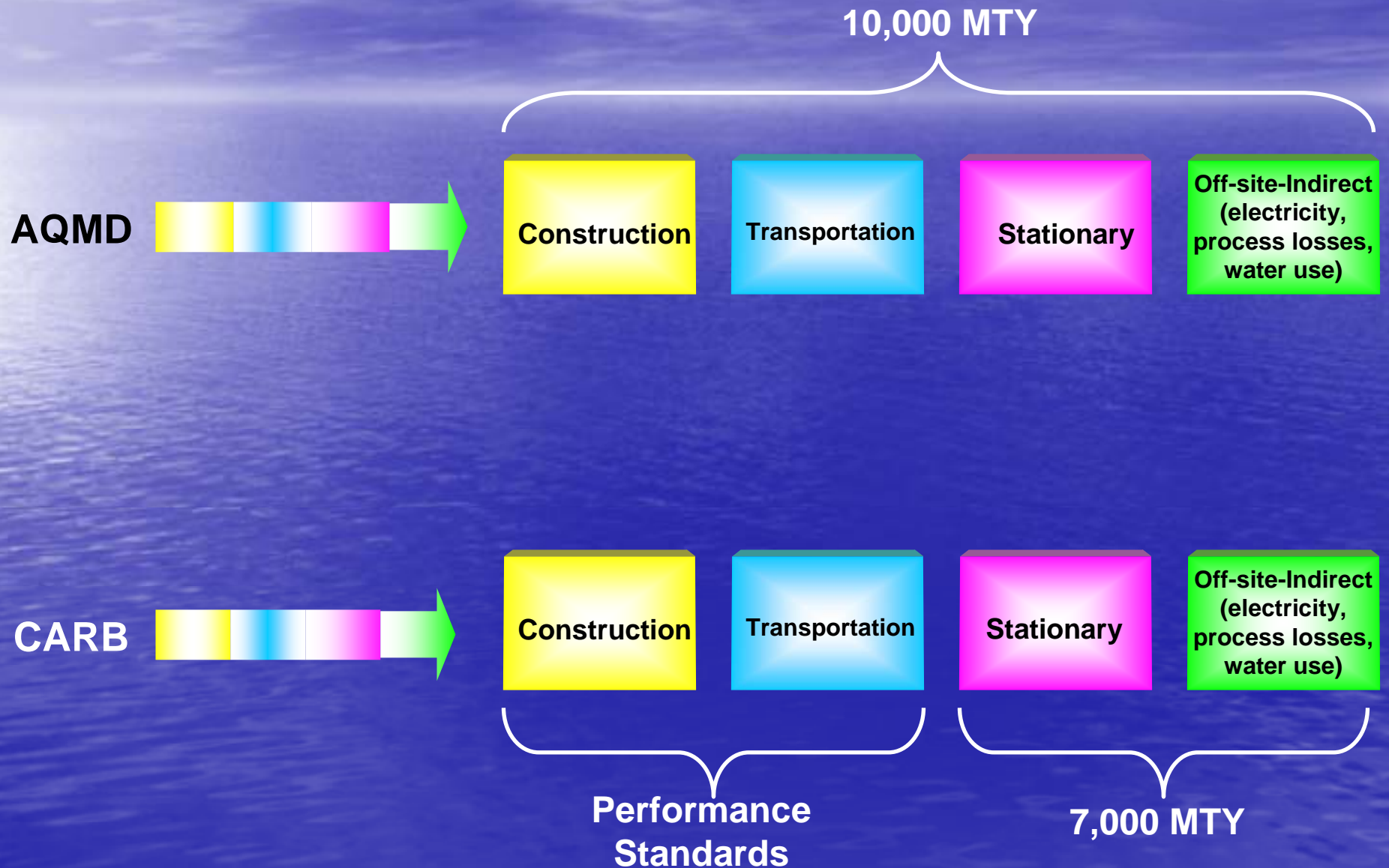
# Staff-Recommended Proposal to the Board (Cont.)<sup>1</sup>

- Mitigation order of preference
  - ✓ Design features, e.g., use materials with low GWP, more efficient combustion technology, etc.
  - ✓ Onsite GHG reduction measures
  - ✓ Offsite GHG reduction projects implemented in local neighborhood
  - ✓ Offsite GHG reduction projects implemented in the district
  - ✓ Offsite GHG reduction projects implemented in California
  - ✓ Offsite GHG reduction projects implemented outside of California

## Staff-Recommended Proposal to the Board (Cont.)

- Allow substitution of mitigation measures to address potential interplay with AB 32 scoping plan implementation and to avoid mitigating the same emission twice
  - ✓ Enforceable commitment to provide mitigation prior to occurrence of emissions

# Comparison of Approaches





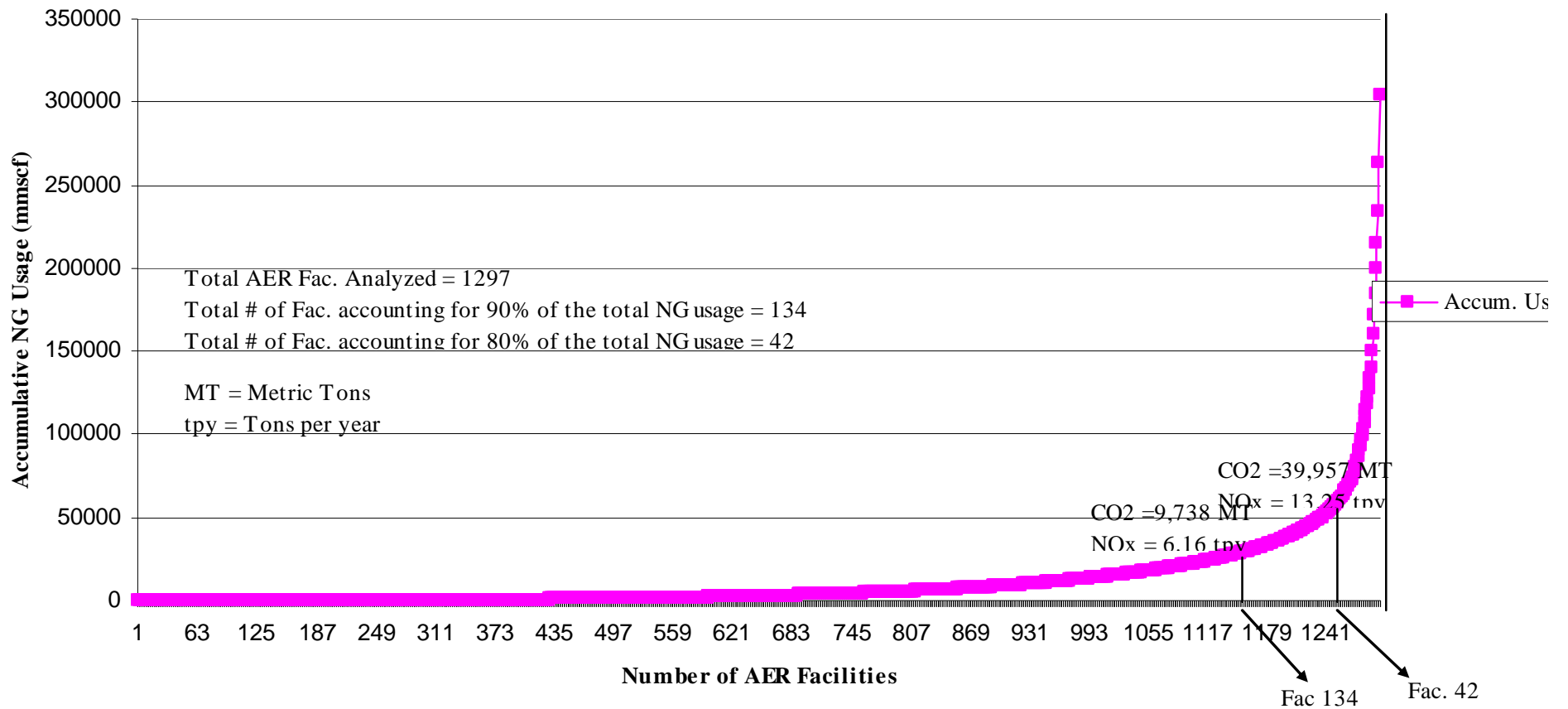
# SCAQMD Resource Impacts

- SCAQMD would prepare at least ~ 30 more CEQA documents as lead agency for permit application projects where SCAQMD has primary approval authority
  - ✓ CARB's interim GHG significance threshold proposal would require AQMD to prepare > 100 additional CEQA documents for permit application projects

# Implementation & Future Activities

- Implementation of GHG significance threshold: upon adoption
- Future Activities
  - ✓ Report back in March on Tier 4 & recommendation for residential and commercial GHG significance thresholds, if not acted on by CARB board by February
  - ✓ Compile GHG emission factors and mitigation measures
  - ✓ Continue working group process in coordination with CARB effort

# Staff Recommended Proposal to the Board GHG Emission Analysis



# Comparison of Approaches

Tier/ Box	Policy Objective	Stationary/Industrial Sector Projects		Residential/Commercial Sector Projects	
		CARB	AQMD	CARB	AQMD
1		Apply Applicable Exemption	Apply Applicable Exemption	Apply Applicable Exemption	Apply Applicable Exemption
2	CARB stationary source, 90% capture rate	Project Meets Construction & Transportation Performance Standards & < 7,000 MTCO <sub>2</sub> eq/yr	Project Consistent with Applicable GHG Reduction Plan with GHG inventorying, monitoring, enforcement, etc.	Project Consistent with Applicable GHG Reduction Plan with GHG inventorying, monitoring, enforcement, etc.	Project Consistent with Applicable GHG Reduction Plan with GHG inventorying, monitoring, enforcement, etc.
3	CARB residential & AQMD stationary & residential, 90% capture rate	Project is Significant, EIR is Prepared	Industrial Project is < 10,000 MTCO <sub>2</sub> eq/yr & exceeds – construction emissions amortized over 30 years & added to operational GHG emissions	Project Meets Construction & Operation (Energy, Water Use, Waste & Transportation) Performance Standards & < X MTCO <sub>2</sub> eq/y	Project is < 3,000 MTCO <sub>2</sub> eq/yr & exceeds Title 24 Energy Efficiency Standards by 15%, if applicable – construction emissions amortized over 30 years & added to operational GHG emissions
4	AQMD stationary & residential, achieve AB 32 target objective, reduce 30% from BAU		3 Compliance Options: 1) Reduce GHG emissions 30% below BAU; 2) Early Implement AB 32 Measure; 3) Comply with Performance Standard	Project is Significant, EIR is Prepared	3 Compliance Options: 1) Reduce GHG emissions 30% below BAU; 2) Early Implement AB 32 Measure; 3) Comply with Performance Standard
5			Implement offsite mitigation for life of project, i.e., 30 years		Implement offsite mitigation for life of project, i.e., 30 years
			Project is significant, EIR is Prepared		Project is significant, EIR is Prepared