

INTERIM APPROACH TO ADDRESSING CLIMATE CHANGE IN CEQA DOCUMENTS

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Absent clear direction from the State of California, but recognizing the need to address the global climate change issue in CEQA documents, the following is an outline of an interim approach to addressing climate change for privately initiated discretionary projects. This approach will be modified as needed based on more specific guidance from the State and will be further refined when the County's General Plan Update is completed. In the interim, the following approach is being taken by DPLU in evaluating the need for Climate Change Analysis and in evaluating the adequacy of Climate Change Reports.

Determination of Need for Climate Change Analysis in CEQA documents

Various screening thresholds have been published by the California Air Resources Board (CARB) and the California Air Pollution Control Officers Association (CAPCOA). Screening thresholds for determining when a Climate Change analysis is needed to date have been presented as "suggestions" or "options" for lead agencies to consider in setting a screening criteria for requiring a Climate Change Analysis.

The 900 metric ton screening criteria (CO₂ generated annually) referenced in the CAPCOA white paper (<http://www.capcoa.org/>) is being used as a conservative criteria for determining which projects require further analysis and mitigation with regard to Climate Change. The follow table describes the general sizes of projects that would generally require this analysis, however the determination of need for a climate change analysis must consider project specific details that could contribute to a climate change impact.

Project Sizes that Would Typically Require a Climate Change Analysis *

Project Type	Project Size
Single Family Residential	50 units
Apartments / Condominiums	70 units
General Commercial Office Space	35,000 square feet
Retail Space	11,000 square feet
Supermarket / Grocery Space	6,300 square feet

*A determination on the need for a climate change analysis for project types not included in the table will be made on a case-by-case basis considering the 900 metric ton criteria.

Minimum Requirements for Climate Change Reports

The following are the minimum recommended components of a Climate Change Analysis:

1. **Background:** This section should briefly discuss the issue of climate change and greenhouse gases (GHGs), along with a brief history of recent California regulations that have required Climate Change to be considered as a part of the California Environmental Quality Act (CEQA). Explain that Climate Change is not generally considered a direct impact but would be analyzed as a potential cumulative impact under CEQA. This section should discuss the suggested questions referenced in the CEQA Guidelines, Appendix G, VII. Greenhouse Gas Emissions.

2. Project Description and Location: Include the location of the project and a detailed project description. Include any project design features that will be used to demonstrate emissions reductions.
3. Greenhouse Gas Inventory: This section should provide a detailed accounting of the project's construction and operational greenhouse gas emissions. Construction GHG Emissions should account for emissions associated with the use of heavy construction equipment, construction worker Vehicle Miles Traveled (VMTs), and construction water usage for the duration of construction activities. Operational GHG emissions should include energy use (including electricity, natural gas and water), transportation VMTs, and solid waste. Certain pending fuel efficiency standards (e.g. Pavley Bill, CAFÉ standards, etc.) may be assumed to reduce a portion of the project's vehicle emissions. The greenhouse gas inventory must include justification and references to the extent practical to document the assumptions that are made about the emissions calculations.
4. Guideline for Determining Significance: The report must include a clearly stated significance guideline to determine the significance of impacts. DPLU recommends the following guideline: "The project would not impede the implementation of AB 32." To demonstrate that the project would not impede the implementation of AB 32, the project should demonstrate how the carbon emissions generated by the project would be reduced to 33% below projected Business As Usual (BAU) levels in 2020. The 33% reduction can be an overall reduction considering both construction and operational emissions combined. BAU means the projected 2020 emissions that would have been generated without implementation of 2006 emissions restrictions and updated standards (e.g. 2005 Title 24 standards). Discuss the reason for choosing this significance guideline, referencing AB 32 legislation and implementing strategies that have been developed to reduce carbon emissions to meet statewide reduction targets. The 33% reduction target is based on the San Diego County Greenhouse Gas Inventory: An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets prepared by the University of San Diego and the Energy Policy Initiatives Center (EPIC), September 2008. This regional inventory found that San Diego County would need to reduce emissions by 14 MMT CO₂E, or 33% below projected BAU levels in 2020.
5. Project Design Features and Mitigation Measures: The analysis must include specific, enforceable measures to reduce project emissions. To the extent feasible, each measure should include references or a logical, fact based explanation as to why a specific measure will achieve the stated reductions. While it will generally be possible to quantify reductions associated with energy and water related measures, other measures may require qualitative discussion of reductions achieved. Numerically identify GHG Emissions and associated emissions under a BAU scenario and identify corresponding mitigation measures that would reduce BAU emissions.

This section must clearly differentiate between Design Features and Mitigation Measures. Design Features should also typically be referenced in the project description. Measures that are not specific or enforceable will not be accepted as mitigation. Use of an independent third party certification using an available green building standard and rating system is one method to implement design and mitigation measures. Examples of certification systems that may be used include LEED or Leadership in Energy and Environmental Design Green Building Rating System, the GPR or Green Point Rated system administered by Build It Green, and the CGB or California Green Builder rating system for residential construction. Regardless of the rating system used, specific enforceable measures would need to be identified the report would need to provide some assumptions about the carbon emission reductions that would be achieved from each measure.

6. Conclusion: Make a clear conclusion whether the project exceeds the Guideline for Determining Significance, specifically stating the guideline used. Make a clear conclusion as to whether the impact is considered fully mitigated.