

CEQA and Climate Change – What Cities Need to Know

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Background

- Adoption of AB 32 - recognition of threat of global warming to public health, natural resources, economic well being, etc.
- Public agencies facing increasing pressure to identify & address GHG impacts in CEQA documents
- Several Attorney General Lawsuits
 - ✓ San Bernardino General Plan – failure to analyze GHGs
 - ✓ ConocoPhillips Bay Area Refinery Settlement – failure to conclude whether or not GHGs significant

Tools for Analyzing GHG Emission Impacts

- URBEMIS2007 – Calculates CO₂ Emissions from off-road and on-road mobile sources
 - ✓ Currently does not calculate other GHGs
 - ✓ Currently does not calculate GHGs from stationary sources
 - ✓ Upgrade currently in progress to create comprehensive GHG module

Tools for Analyzing GHG Emission Impacts (Cont.)

- CARB's EMFAC2007 model – calculates CO₂ & methane emissions for on-road mobile sources
- CARB's OFFROAD2007 model – calculates CO₂ & methane emissions for off-road mobile sources
- U.S. EPA's AP-42 – Compilation of Air Pollutant Emission Factors for stationary and miscellaneous sources
- SCAQMD Website:
 - ✓ On-road - simplified CO₂ & methane emission factors (from EMFAC2007)
<http://www.aqmd.gov/ceqa/handbook/onroad/onroad.html>
 - ✓ Off-road - simplified CO₂ & methane emission factors (from OFFROAD2007)
<http://www.aqmd.gov/ceqa/handbook/offroad/offroad.html>

Considerations When Analyzing GHG Emissions

- GHG pollutants: 6 Kyoto pollutants to the extent EFs are available
- Cumulative v. project specific – consensus GHG impacts are cumulative impacts
- Analyze direct GHG emissions or life cycle emissions?
- Current SCAQMD staff recommendation - direct GHG emissions
 - ✓ Life cycle factors not well established for all processes
 - ✓ Some life cycle processes occur outside CA.
 - ✓ CEQA requires analysis of impacts in CA.
 - ✓ CARB inventory - direct emissions
 - ✓ GHG reductions as mitigation - direct emissions

Determining GHG Significance

- Per Attorney General – lead agencies must evaluate & determine significance of a project
- San Joaquin Valley APCD only air agency to specify a numerical GHG threshold
 - ✓ Identified a draft threshold March 2008
 - ✓ GHG threshold = 38,477 MT CO₂eq
 - ✓ Based on CAPCOA threshold option 2.4 – Regulated Emissions Inventory Capture
 - ✓ Currently, no plans to formally approve through a public process, not generally applicable

Determining GHG Significance (Cont.)

- SCAQMD currently has no recommended GHG significance threshold(s)
- SCAQMD, as a lead agency, currently determines significance on a case-by-case basis
 - ✓ Consider using CAPCOA White paper significance threshold options
(<http://www.capcoa.org/ceqa/CAPCOA%20White%20Paper%20-%20CEQA%20and%20Climate%20Change.pdf>)
 - ✓ Consider using AB 32 as a guideline in developing significance thresholds

SCAQMD Has Established GHG Significance Threshold Working Group

- Purpose – establish GHG significance threshold(s) (<http://www.aqmd.gov/ceqa/handbook/GHG/GHG.html>)
 - ✓ Policy considerations – purpose of GHG significance threshold(s)
 - ✓ Design considerations
 - Resource impacts – number of EIRs vs. negative declarations or categorical exemptions
 - A single threshold vs. multiple thresholds
 - Short-term (2008 through 2020) vs. long-term (2021 through 2050) considerations
 - GHG pollutants: 6 Kyoto pollutants to the extent EFs are available (carbon black will consider at a later date)
 - Time frame of analysis, impacts vs. mitigation

Mitigation Measures

- If impacts significant, identify feasible mitigation measures, e.g.:
 - ✓ Reduce VMT through greater use of transit, TDM strategies, etc.
 - ✓ Low GHG electricity production, e.g., wind farms, hydroelectric, cogeneration, etc.
 - ✓ High-density infill projects, connect to transit
 - ✓ Exceed Title 24 energy efficiency standards
- Quantify mitigation measure effectiveness to the extent control efficiencies are available

Conclusion

- Use currently available tools to analyze GHG impacts to the extent feasible
- Determine significance
 - until formal significance thresholds established, can use CAPCOA White Paper for guidance
 - Track SCAQMD progress developing significance thresholds
 - CARB significance threshold by the end of June
- Apply feasible mitigation
- Questions?