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

- URBEMI S2007 – 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)
  - Off-road - simplified CO2 & methane emission factors (from OFFROAD2007)
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 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?