

Greenhouse Gas CEQA
Significance Threshold
Stakeholder Working Group #5

August 27, 2008

SCAQMD

Diamond Bar, California

GHG Emission Estimates

- Emission Assessments
 - ✓ Direct and indirect project emissions
 - ✓ Life-cycle emissions to be included to the extent technically feasible
 - ✓ Energy use for water use and electricity to be included
 - ✓ Constructions to be amortized over a 30-year period
 - ✓ Six Kyoto GHG pollutants
 - ✓ Cap-&-trade facilities/sources?

Proposed Tiered Threshold Approach

- Design improvement for easier integration and use by CEQA practitioners
- Minimum design requirements incorporated
- Interim method until statewide threshold established
- Refinements added

Business-As-Usual

- CAPCOA White Paper BAU definition:
 - ✓ Projection of GHGs into the future based on current technologies & regulations in the absence of other reductions
 - ✓ Adoption of new GHG reduction regulations, e.g., CARB's Scoping Plan measures, in the future establishes new BAU, i.e., evolves over time
 - ✓ BAU normally defines CEQA's no project alternative, but does not necessarily form the project baseline

Business-As-Usual Definition

- CAPCOA BAU discussion does not explicitly discuss baseline, however, implies BAU also establishes baseline, e.g.,
 - ✓ Power Plant example – requires establishing baseline based on current BAU, i.e., current technologies & regulatory requirements
 - ✓ To determine future BAU emissions from power plant, multiply projected energy throughput by current EF, e.g., BAU

Business-As-Usual Definition

- CAPCOA's definition of BAU does not preclude it from establishing baseline
 - ✓ Baseline may be identical to no project alternative (§15126.6(e)(1))
 - ✓ No project alternative is what is reasonably expected to occur in the foreseeable future if the project is not adopted (§15126.6(e)(1))

Business-As-Usual Definition

- No definition of BAU in CARB's Scoping Plan
- A brief definition in the 1990 inventory (11/2007) used to project 1990 GHGs to 2020 – BAU is:
 - ✓ GHG emissions estimates in the absence of policies & measures
 - ✓ Based on forecasted demographic and economic growth
- Need more documentation to implement CARB's definition of BAU
- BAU should be consistent with CARB's definition

Business-As-Usual Definition

- SCAQMD Staff recommendation for BAU
 - ✓ Is based on current technologies and regulatory requirements (consistent with CAPCOA & CARB)
 - ✓ Is used to establish project's baseline (consistent with CAPCOA power plant example)
 - ✓ Is used to project project's future emissions (consistent with CAPCOA & CARB)
 - ✓ Is used to establish no project alternative (consistent with CAPCOA & CARB)

Further Discussion of Screening Level

- Screening level is meant to define small projects that do not contribute appreciably to climate change
 - ✓ Initial discussion – 900 MT CO₂eq/year (equivalent to 90 percent capture rate for land use development CEQA documents)
 - ✓ Current staff proposal – 6,500 MT CO₂eq/year (GHG equivalent to annualized NO_x significance threshold with minimum mitigation/design requirements)
 - ✓ New tier 3 – 900 MT CO₂eq/year with no minimum mitigation/design requirements

Further Discussion of Screening Level

- Consideration of separate screening level for land use industrial projects vs. land use/commercial projects
 - Staff recommendation – single screening level at this time
 - Tiered approach accommodate different land use projects
- Other Screening Level Options
 - ✓ 10,000 MT (Cap-and-Trade reporting level)
 - ✓ 25,000 MT (CARB reporting threshold & 90 percent CEQA document capture rate for industrial projects)
 - ✓ Others?

Tier 5 Option #1 – Uniform Percent Emission Reduction Target Objective from BAU

- Consistent with AB32 goals
 - ✓ 30 percent reduction by 2020 to 1990 levels
- More stringent than AB32 goals
 - ✓ 40 percent reduction
- Less stringent than AB32 goals
 - ✓ Less than 30 percent reduction
- Other suggestions?

GHG CEQA Threshold Staff Report

- Outline of proposed GHG staff report
 - ✓ Introduction and executive summary
 - ✓ Legislative background discussion
 - ✓ SCAQMD GHG significance threshold development & proposal
 - ✓ Conclusion & future action items