

# **CEQA Greenhouse Gas Threshold and Revisions to District *Environmental Review Guidelines***

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**Board of Directors  
Santa Barbara County  
Air Pollution Control District**

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# Overview

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- Project Description
- Threshold Options
- CAC Recommendation and Minority Letter
- GHG Mitigation White Paper
- APCO Recommendations

# Project Description

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- Establish a stationary source greenhouse gas (GHG) threshold of significance to be used by the District when acting as a lead agency under CEQA
- Incorporate threshold into the District's *Environmental Review Guidelines*
- Other minor revisions and updates to the *Guidelines* to reflect current CEQA practice and update the list of exempt projects found in Appendix A of the Guidelines

Environmental Review Guidelines

*for the*

Santa Barbara County  
Air Pollution Control District

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*Guidelines for the Implementation of the  
California Environmental Quality Act of 1970, as amended*

*Adopted by the*  
Air Pollution Control District Board  
October 19, 1995  
Revised November 16, 2000



*Our Vision: Clean Air*

# Threshold Options

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## Bright Line 10,000 MT/yr

- Project with emissions > 10,000 MT/yr = significant
- Projects with emissions < 10,000 MT/yr = less than significant
- Capture rate of 82.4% based on 2013 countywide stationary source GHG emissions

## AB 32 Consistency

- 10,000 MT/yr *screening threshold*
- Considers Cap-and-Trade as a *Qualified Greenhouse Gas Reduction Plan*
- Requires a 15.3% reduction from business-as-usual (BAU) emissions
- Commitment to update % reduction as the state adopts new reduction targets



# CAC Recommendation

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- The CAC is an advisory body, no decision making authority
- CAC members disclose financial interest in agenda items at the beginning of each meeting
- **A motion was carried on a vote of 15\* to 7 to recommend adoption of the AB 32 Consistency threshold option to the Board**

*\* CAC vote was 9-7 if those members who declared financial interest are removed from the vote count*

# CAC Minority Position

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Letter recommended two actions:

- Adopt a bright line threshold of 1,000 MT/yr
- Direct staff to prepare a GHG Reduction Plan and Program EIR for projects that emit between 1,000 and 10,000 MT/yr; suite of mitigation options for those projects

Response:

- Bright line threshold of 1,000 MT/yr does not meet project objectives
- GHG Reduction Plan and Program EIR is beyond the scope of this project

**Typical Source Category by GHG Bracket:**

**<1K MT CO2e:**

Emergency Standby Generators,  
Small Oil and Gas Extraction Facilities,  
Additional Miscellaneous Small Sources

**1K-5K MT CO2e:**

Mid-size Medical Facilities,  
Federal Justice Facilities,  
Oil and Gas Extraction Facilities,  
Mineral Extraction/Processing Facilities,  
Educational Facilities  
Miscellaneous Manufacturing Facilities,  
Mid-size Hotels

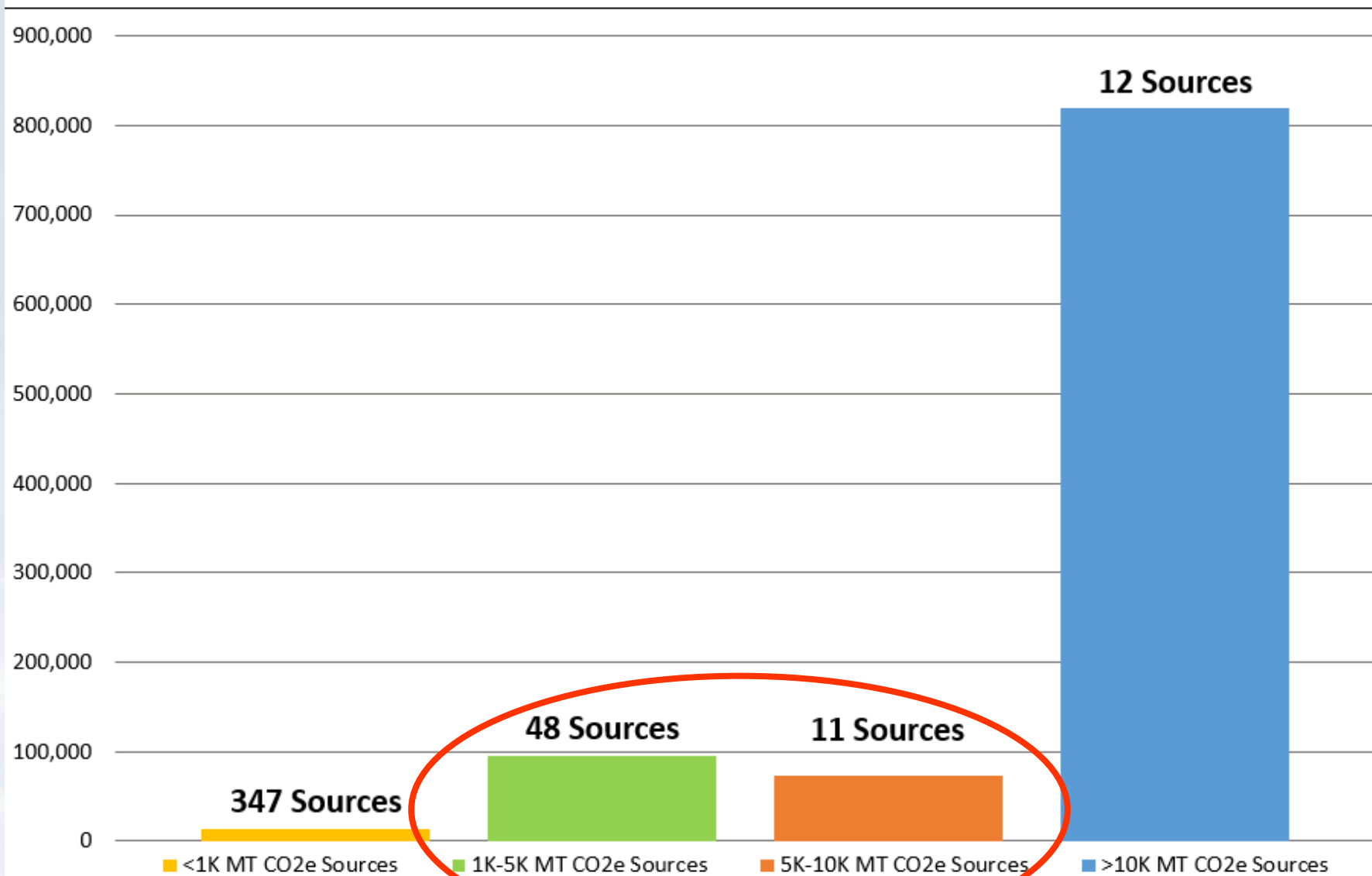
**5K-10K MT CO2e:**

Large Medical Facilities,  
Oil and Gas Extraction/Refining Facilities,  
Mineral Extraction/Processing Facilities,  
Mid-size Educational Facilities,  
Electronics Manufacturing Facilities,  
Large Hotels

**> 10K MT CO2e:**

Large Oil and Gas Extraction Facilities,  
Large Landfills,  
Large Mineral Extraction/Processing  
Facilities,  
National Defense Facilities,  
Large Educational Facilities

**Santa Barbara County, CA  
Total Emissions (MT/yr) by Source GHG Bracket (2013)**



# Mitigation White Paper

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- Information to assist in developing mitigation strategies
- Mitigation location, timing
- Several approaches discussed
- Review of existing programs, protocols, registries
- Costs
- Implementation - scenarios
- Mitigation Monitoring and Reporting Plans





# Director Recommendation

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- That the Board adopt the option recommended by a majority of the CAC, the **AB 32 Consistency Threshold**.
- That the Board approve the proposed revisions to the *Environmental Review Guidelines*.

# Board Actions

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- Board to consider:
  - Adoption of a GHG threshold for projects when APCD is CEQA lead agency – “AB 32 Consistency” option is recommended by the CAC and the Director
  - Proposed revisions to the District’s *Environmental Review Guidelines* (including the selected GHG threshold)
  - Resolution, CEQA findings, and CEQA exemption

*The Mission of the SBCAPCD is to protect the people and the environment of Santa Barbara County from the effects of air pollution.*

