



Air Pollution Control District
San Luis Obispo County

SLO County APCD Update on CEQA & GHG

30 June 2021 - BCC

APCD CEQA Team

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OUTLINE

- Introduction to the new [APCD CEQA website](#)
- SLO Co. APCD's [2021 Interim CEQA Greenhouse Gas Guidance](#)
- GHG inventory
- Discussion of “What’s Next”
 - Climate planning for your jurisdiction?
 - ICLEI *ClearPath* regional membership & High Impact Actions
 - GHG CEQA thresholds?
 - Local GHG Mitigation Offset & VMT Banks
- Questions?

- Introduction to the new [APCD CEQA website](#)

INTERIM GUIDANCE

- ▶ 6-page Memo released in January 2021
- ▶ Format focuses on answering questions from 2020 AEP CEQA Handbook Appendix G:
 - ▶ *(a) Does the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment*
 - ▶ *(b) Does the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*
- ▶ Multiple feedback sessions with our 8 jurisdictions and AEP Climate Change Committee

Question (a)

Does the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

NEWHALL RANCH & SB 32

- ▶ *Center for Biological Diversity vs California Department of Fish and Wildlife (2015)*
 - ▶ AB 32 based thresholds derived from a gap analysis are invalid for projects with a planning horizon beyond 2020.

AB 32	Reduce GHG emissions to 1990 levels by 2020 — a reduction of approximately 15 percent below emissions expected under a “business as usual” scenarios.
SB 32	Reduce GHG emissions to 40% below 1990 levels by 2030
Executive Order (EO) S-3-05	Reduce GHG emissions to 80% below 1990 levels by 2050

EXISTING GHG THRESHOLDS

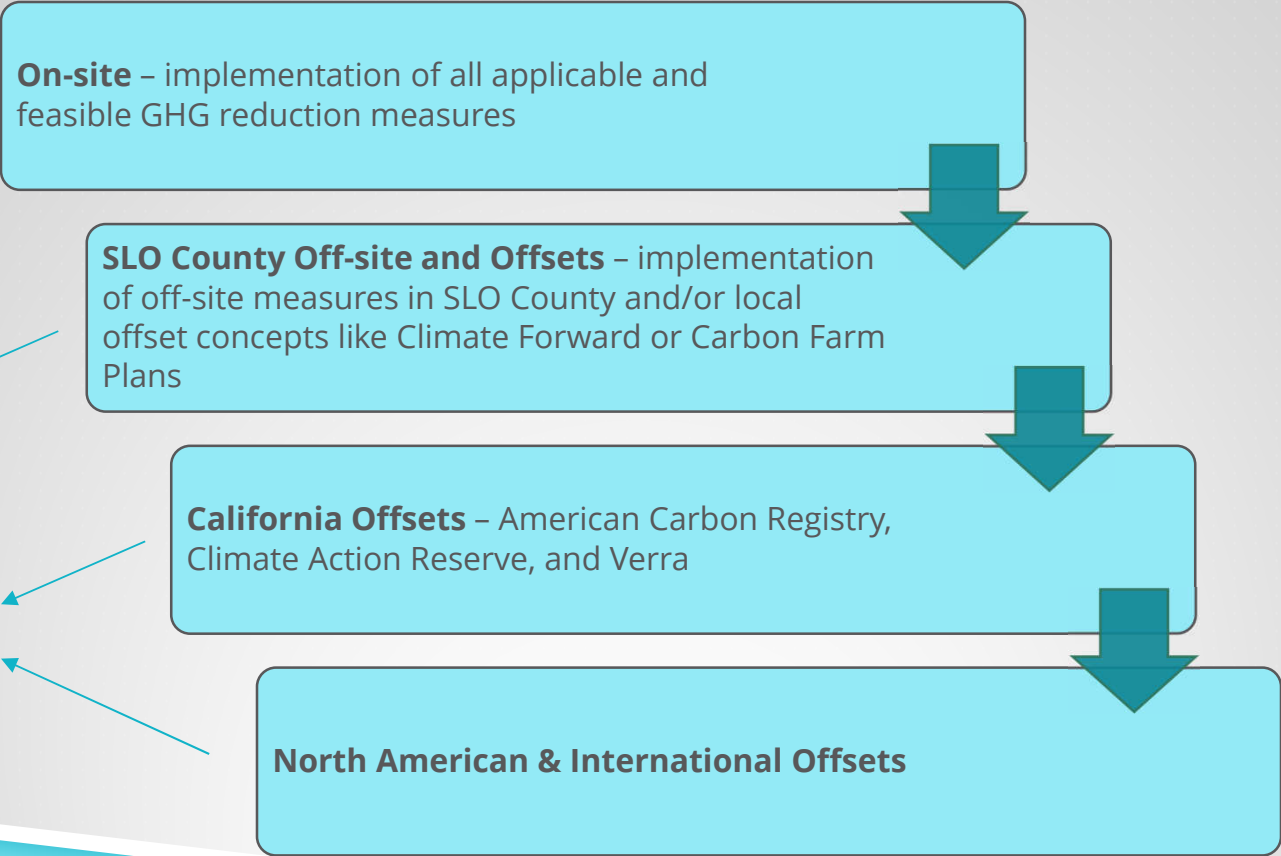
Pollutant	Threshold
Greenhouse Gases (CO ₂ , CH ₄ , N ₂ O, HFC, CFC, F6S)	Consistency with a Qualified Greenhouse Gas Reduction Plan
	1,150 MT CO₂e/year - "bright-line"
	4.9 CO₂e/SP/year (residents + employees) - "service population"
	10,000 MT CO ₂ e/yr threshold for stationary (industrial) sources

- ▶ The "bright-line" and "service population" thresholds are based on a gap analysis/substantial evidence and consistent with AB 32 and CARB's 2008 Scoping Plan.

PROPOSED METHODS FOR PROJECT HORIZONS BEYOND 2020

<p>Consistency with a Qualified CAP</p>	<p>Qualified and Eligible for project streamlining if conforming to CEQA Guidelines § 15183 and 15183.5</p>
<p>No-net Increase</p>	<p>CA 2017 Scoping Plan states no-net increase “appropriate overall objective” (page 101)</p>
<p>Lead Agency Adopted Defensible GHG Thresholds</p>	<p>Best Management Practices (e.g. Sac Metro AQMD)</p>
	<p>GHG Bright-line & Efficiency Thresholds</p>

RECOMMENDED MITIGATION HIERARCHY FOR EXCESS GHG IMPACTS



Consistent with CARB Registry or equivalent + real, additional, quantifiable, permanent, verifiable and enforceable

Question (b)

Does the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

PLAN, POLICY OR REGULATIONS TO CONSIDER

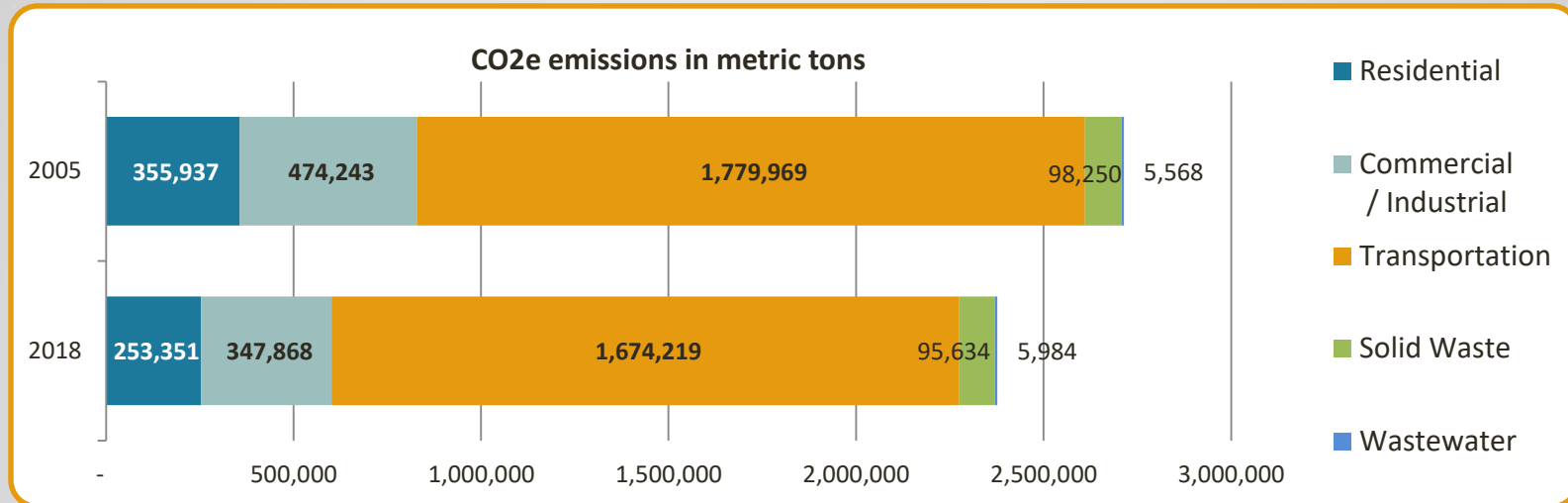
Climate Action Plans	Show consistency with any locally adopted plan designed to reduce GHG emissions
SLOCOG RTP & SCS	Show consistency with land use and transportation policies, goals, action strategies, and preferred growth scenario
CARB 2017 Scoping Plan	All applicable components within the Scoping Plan should be evaluated for consistency
	Show consistency with 15%* VMT reduction (to show consistency with State's Climate Goals)

*Not be confused with the SB 743 evaluation needed in the transportation section of a project's CEQA evaluation.

- GHG inventory project

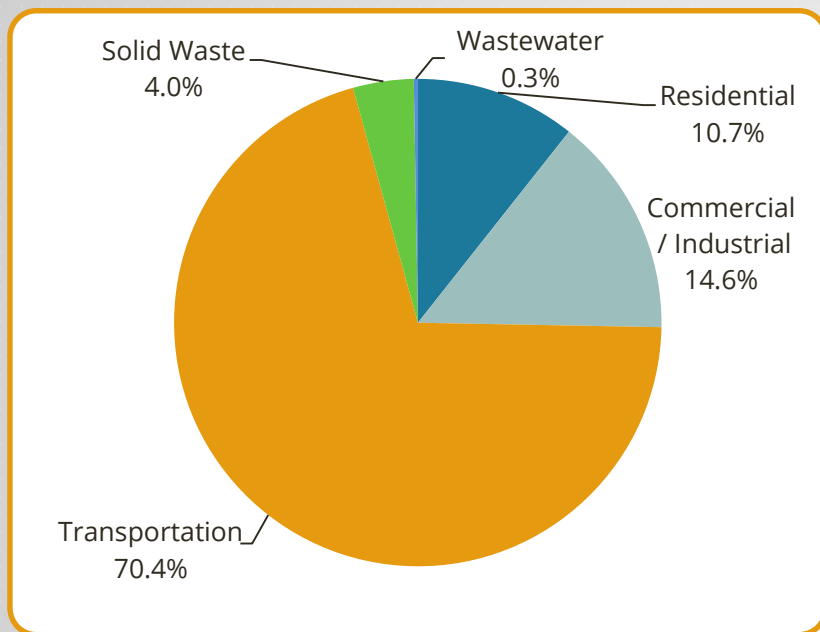
SLO County-wide Inventory: AMBAG 2018 GHG Inventory Project

- 3CE/AMBAG will supply annual updates
- Complies w/ ICLEI US Community Protocol for Accounting & Reporting of GHG Emissions
- **AB 32**'s GHG Reduction Target is 1990 levels by 2020
 - o Equivalent target is 15% below 2005 levels by 2020
- **SB 32** Target 40% below 1990 by 2030
 - o Equivalent target \approx 50% below 2005 levels by 2030; 2045 target is carbon neutrality



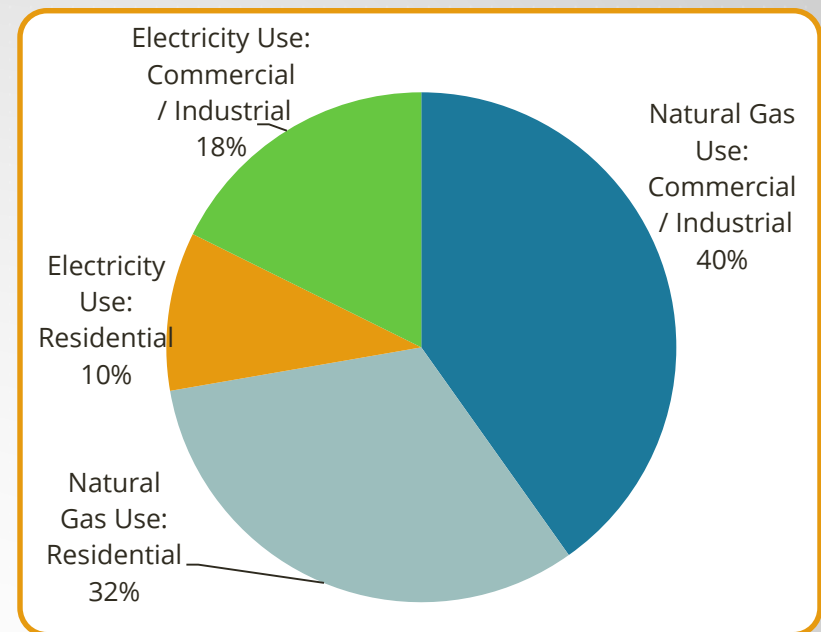
Community CO2e Emissions by Sector	Residential	Commercial / Industrial	Transportation	Solid Waste	Wastewater	Total
2005	355,937	474,243	1,779,969	98,250	5,568	2,713,967
2018	253,351	347,868	1,674,219	95,634	5,984	2,377,056
MTs Reduced	-102,586	-126,375	-105,750	-2,616	416	-336,911
% change 2005- 2018	-29%	-27%	-6%	-3%	7%	-12%

COUNTY-WIDE 2018 GHG EMISSIONS BY SECTOR



2,377,056 metric tons CO₂e

County-wide 2018 Energy Use GHG Emissions



601,219 metric tons CO₂e (25.3% of total)

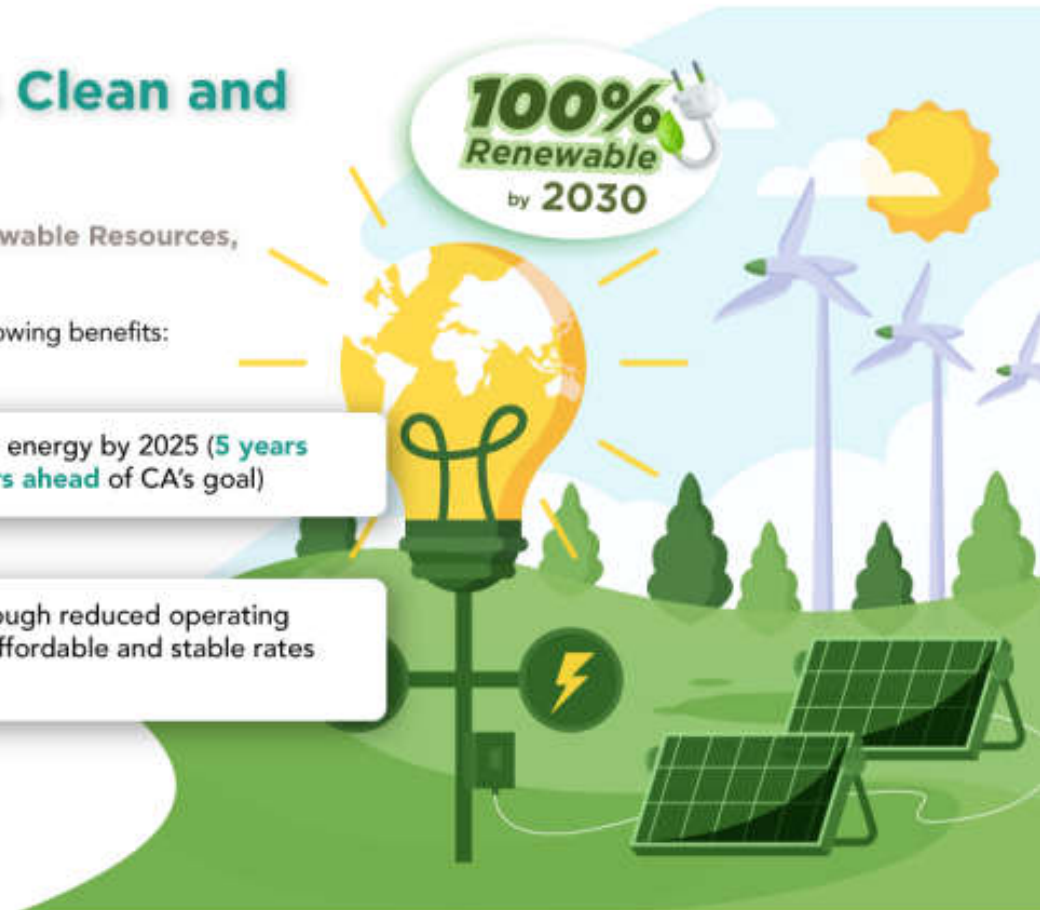
3CE's Pathway to 100% Clean and Renewable by 2030

Supporting Affordable Rates, Increasing Renewable Resources, and Accelerating Greenhouse Gas Reduction

3CE's new energy-supply strategy will provide the following benefits:

3CE's goal is to reach 60% clean and renewable energy by 2025 (**5 years ahead** of CA's goal) and 100% by 2030 (**15 years ahead** of CA's goal)

Financially beneficial to customers and 3CE through reduced operating costs of **\$8-15 million/year** allowing for more affordable and stable rates while supporting economic development



➤ Discussion of “What’s Next”

- Climate planning for jurisdictions?
- ICLEI *ClearPath* regional membership & High Impact Actions
- GHG CEQA thresholds?
- Local GHG Mitigation Offset & VMT Banks

WHAT'S NEXT? CAPs

- ▶ Climate Action Plan Update?
 - ▶ AB 32 CAP updates?
 - ▶ Regional CAP?



Figure 2 ICLEI Emissions Mitigation Milestones

WHAT'S NEXT? HIGH IMPACT ACTIONS

▶ [ICLEI's ClearPath](#)

- ▶ Platform AMBAG uses to help compute & store annual GHG inventories for 3CE
 - ▶ Also for completing forecasts, climate action plans & monitoring

- ▶ APCD shares regional membership w/ AMBAG and Santa Barbara County

- ▶ [Race to Zero](#) – Consider near-term city actions
 - ▶ In ClearPath, ICLEI will forecast GHG inventory reductions from “5 High Impact Actions” for consideration by all SLO County jurisdictions - APCD will share results.
 - ▶ Possible examples:

POTENTIAL HIGH IMPACT ACTIONS (HIA)	Sector
Benchmark building energy use in existing buildings and implement citywide efficiency programs with an approved roadmap to achieve all net zero carbon buildings by 2050 (include resilience if possible)	Commercial building energy
How to develop a roadmap to achieve net zero carbon new buildings from 2030. (NZE codes)	Commercial, Residential building energy
Smart regs - minimum efficiency requirements for rental properties	Residential building energy
Develop comprehensive housing affordability plan looking at affordability of housing + energy costs (+transportation?). Include efficiency upgrade of existing housing, zoning changes such as accessory dwelling units and smaller dwelling units.	Residential building energy
Develop a roadmap to achieve net zero carbon municipal buildings by 2030 and policy approval by 2025 to deliver a commitment to own, occupy and develop net zero carbon municipal assets by 2030.	Local Government Operations

WHAT'S NEXT? CP FORECAST EXAMPLE

Iowa City Community School District 2018 Inventory & CAP

“Business-as-usual” Forecast

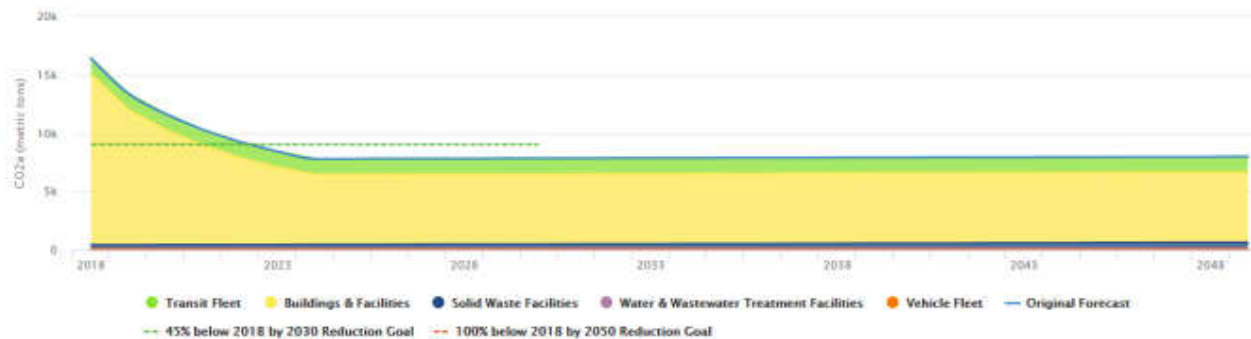


Figure 5: Projected GHG emissions (MT CO₂e) based on electricity carbon intensity and student enrollment growth rates.

Combined impact of three reduction strategies modeled

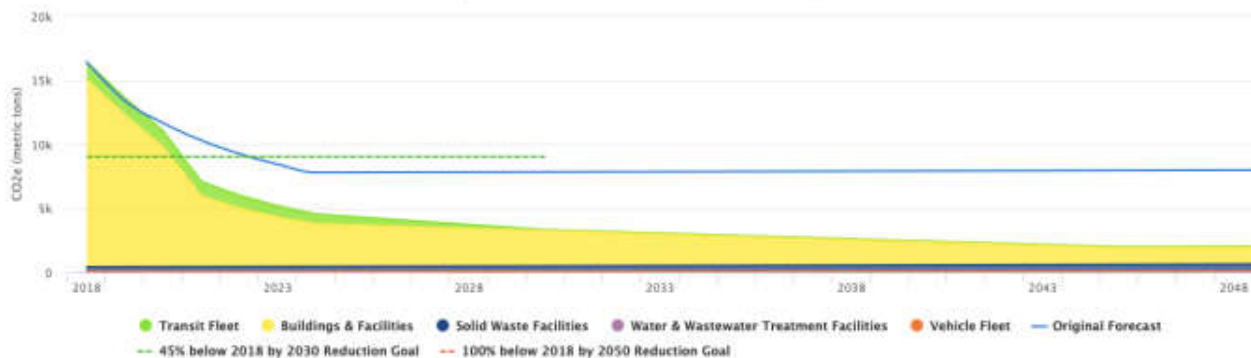
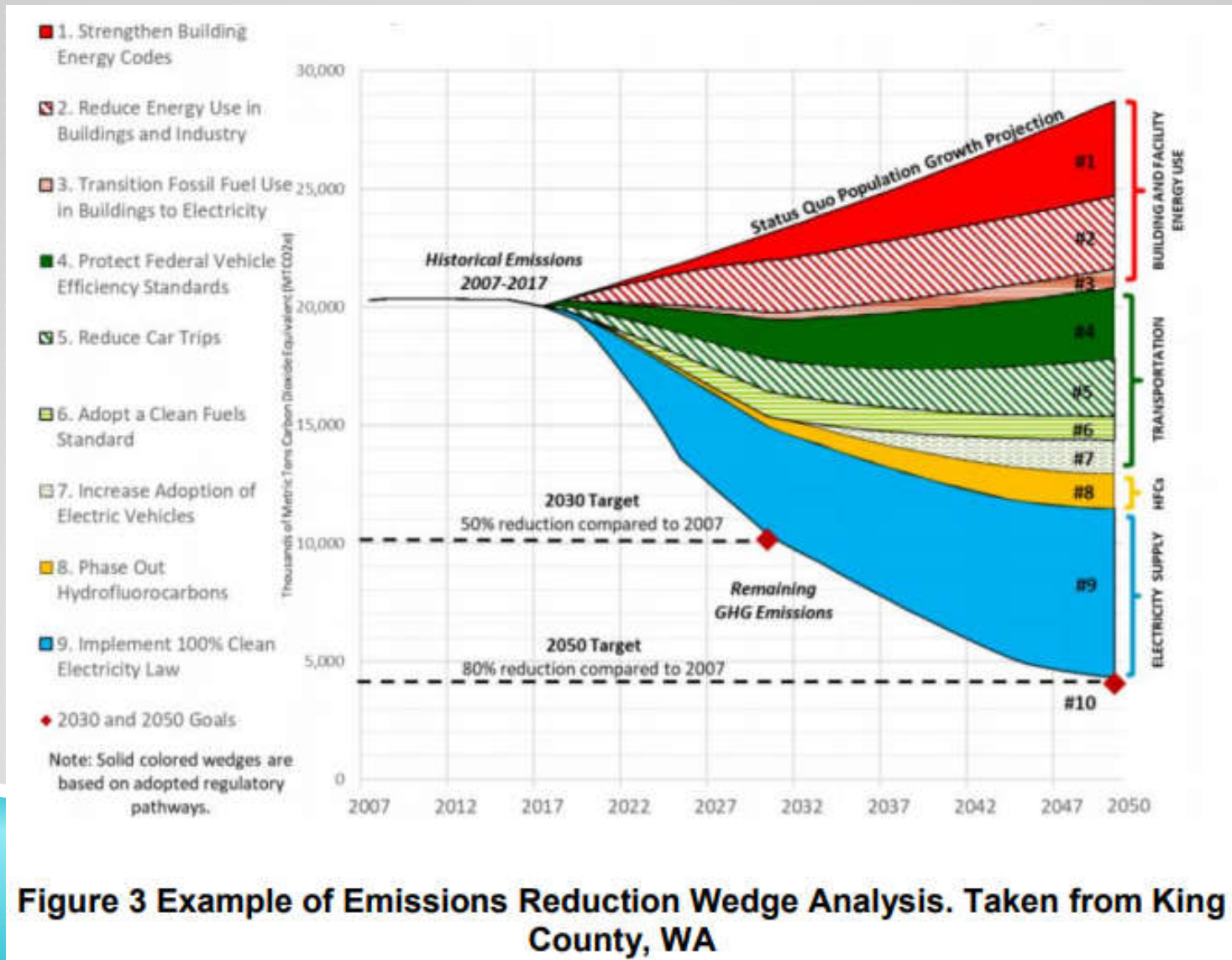


Figure 10: Future emissions reduction potential with combined impact of 1.5 MW solar installation (district owned or PPA), energy conservation and efficiency projects resulting in 20% reduction of electricity use, and full conversion of bus fleet from diesel to electric.

WHAT'S NEXT? WEDGE FORECAST EXAMPLE

Milwaukee 2018 Inventory & Next Steps

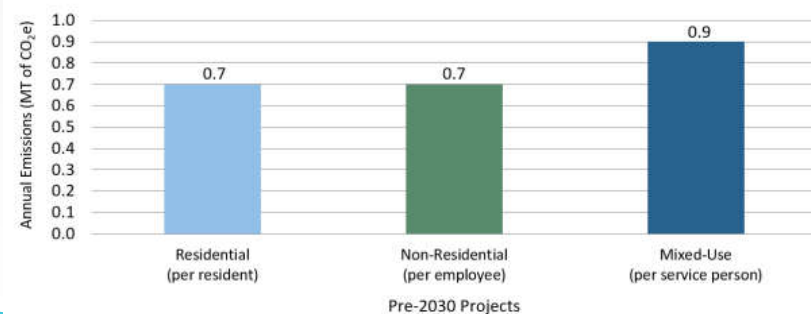


WHAT'S NEXT? EXISTING SB32 THRESHOLDS

▶ Existing SB32 CEQA GHG thresholds:

- Sacramento AQMD ([Best Management Practices](#))
 - BMP 1: The reduction in natural gas emissions
 - BMP 2: Additional EV infrastructure
 - BMP 3: The GHG emissions reduction due to the 15% VMT reduction
- Santa Barbara County ([interim Bright Line -Numeric & Service Population](#))
 - Were not on track for 2020 target
 - Screening threshold be no greater than 300 MT/yr
- City of San Luis Obispo ([BL-SP](#))
- Bay Area AQMD (BMP - pending)

Figure 5 City of San Luis Obispo GHG Efficiency Thresholds



WHAT'S NEXT? CEQA GHG THRESHOLD UPDATE FOR SLO COUNTY?

▶ Future SLO County CEQA GHG Threshold Update?

- Sought input from jurisdictions – General support
- APCD has gathered data needed for consultant to update CEQA GHG Threshold base on substantial evidence
 - Nearly complete Countywide GHG inventory
 - SLOCOG/APCD historic development requests
- APCD is budgeting \$50K for potential threshold update project
- Potential RFP concept: evaluate Bright Line threshold & maybe BMP threshold
 - Provide threshold options for jurisdictions to adopt
 - May provide project cost examples for each option

WHAT'S NEXT? LOCAL GHG MITIGATION OFFSET & VMT BANKS

- ▶ Regional GHG Collaboration Group - Mitigation
- ▶ Carbon Neutral Cities Alliance – Game Changer Grant
 - Develop a Regional Carbon Offset Market Framework
 - RCDs – Carbon Farm Plans w/ protocol compliant actions
- ▶ City of SLO
 - Qualified SB 32 CAP
 - Current projects are inconsistent w/ CAP
 - Offsets will likely be needed
- ▶ Investigating:
 - [Climate Forward](#) as a possible offset solution – Future Mitigation Units
 - Local projects that could be provide FMUs
- ▶ SLOCOG/APCD VMT Bank application for Caltrans sustainable tran. grant

THANK YOU FOR YOUR ATTENTION.

QUESTIONS?

