



South Coast Air Quality Management District

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Review of the Draft Supplemental Environmental Impact Report (draft SEIR) for the Proposed Greenhouse Gas Emissions Reduction Plan Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. AQMD staff appreciates the open and collaborative approach that county staff and its consultants have used in developing this plan. This dialogue has helped AQMD staff to understand the details of the proposed plan and GHG reduction strategies. With some minor revisions (see below) this comprehensive plan provides a pathway for the county to reach its goal of achieving 1990 emission levels by 2020. In addition, with these revisions the proposed plan is consistent with AQMD's GHG threshold for industrial sources, and will allow future projects that comply with the plan to demonstrate a less than significant impact for climate change. The following comments are meant as guidance, and should be considered by the lead agency prior to certifying the Final EIR.

In the draft SEIR the lead agency chose a performance standard to establish a greenhouse gas (GHG) emissions significance threshold. The performance standard selected by the lead agency is based on the California Air Resources Board's (CARB's) AB 32 Scoping Plan, which is the State's plan to achieve 1990 GHG emission levels by 2020. Specifically, the CARB Scoping Plan recommends a GHG reduction goal for local governments of 15% below baseline levels. In order to achieve a less than significant impact on climate change for this proposed plan, the lead agency conducted a comprehensive emissions inventory analysis to determine the requirements needed to reduce the County's baseline 2007 GHG emissions levels by 15% for consistency with AB 32. The emissions inventory analysis demonstrated that the proposed project could meet these targets with the implementation of mitigation measures applicable to internal (public) and external (private) emissions sources.

Additional Mitigation to Remedy any Excess GHG Emissions

In order to allow future projects to tier off this CEQA document, the lead agency established a new significance threshold in the GHG Reduction Plan that requires the County to reduce individual project GHG emissions by 31% below unmitigated 2020 levels. This specific requirement is based on the presumption that without mitigation emissions in the County will grow from 6.25 MMTCO₂e per year in 2007 and reach approximately 7.59 MMTCO₂e per year in 2020. However, AQMD staff is concerned that if the emissions growth rate exceeds anticipated 2020 levels then the proposed mitigation may not be sufficient to ensure less than significant impacts from the proposed plan or future projects tiering off of this EIR. As an example, if 2020 emissions levels are above 7.59 MMTCO₂e per year then the proposed significance threshold (requiring a 31% reduction in GHG emissions) may be inadequate. In order to address this possibility, the lead agency has proposed updating the entire GHG inventory in 2015. AQMD staff requests that if the results of the interim inventory compilation process require a revision of the proposed significance threshold or other alternative measures to remedy the excess emissions that the lead agency commits to providing the public and other stakeholders an opportunity to provide input prior to certifying any changes. As AQMD is a responsible agency for projects requiring an air permit in the County within our jurisdiction this additional commitment will ensure that the proposed project is consistent with Tier 2 of AQMD's Interim CEQA GHG Significance Threshold for Stationary Sources.

Compliance with the GHG Reduction Plan

New development projects can demonstrate compliance with the proposed GHG Reduction Plan by either achieving 100 points from the screening tables provided in the GHG Reduction Plan or conducting a project specific analysis that yields a 31% reduction in GHGs. However, the county did not provide a technical analysis demonstrating that a project which garners 100 points from the screening tables also achieves at least 31% reduction in GHG emissions. Absent a technical analysis that demonstrates equivalence between the point values and GHG emissions reductions (e.g., each point equals approximately a 0.31% reduction in GHG emissions) the effectiveness of the measures provided in the screening tables remains unclear. Therefore, the county should provide additional information that shows a nexus between the point system and the effectiveness of the measures in the screening tables. Further, AQMD staff recommends that the county ensure that the effectiveness of each measure is consistent with the mitigation measures provided in the CAPCOA local government resource document: "Quantifying Greenhouse Gas Mitigation Measures¹."

Area Source (Transportation) Emissions Quantification and Modeling

The county specified that the URBEMIS land use software be utilized to evaluate GHG impacts for future projects through 2020. AQMD staff recently released the California Emissions Estimator Model (CalEEMod). This model has the ability to quantify

¹ The CAPCOA document for quantifying GHG mitigation measures is available at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

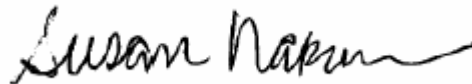
potential GHG emissions and the effectiveness of mitigation measures for transportation activities associated with various land use projects. Therefore, the county should revise the methodology for determining a project's GHG emissions to use the current AQMD recommended land use software to estimate a project's GHG emissions from transportation related sources.

Also, to ensure that projects subject to the GHG Reduction Plan provide quantifiable "real" emissions reductions the AQMD staff recommends that the county provide all necessary land use metrics (e.g., density of existing land use or area) to be used in establishing a given project's baseline emissions based on existing conditions. The land use metrics should be defined in the methodology document for determining a project's GHG impacts that is provided in Attachment B of the GHG Screening Tables. By providing the proper land use metrics for input into emissions calculation software (such as CalEEMod), the county will ensure that all future projects tiering off of this plan will establish a baseline in an equitable manner.

Contact Information

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor CEQA Section, at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,



Susan Nakamura
Planning Manager

Attachment

SN:IM:DG

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