Potential Greenhouse Gas CEQA Significance Thresholds

In CAPCOA *CEQA & and Climate Change* document, a number of options regarding potential significance thresholds are described. Tables 1 and 2 below summarize the main characteristics of CAPCOA's significance threshold. These can be used as a starting point with regard to developing GHG CEQA significance thresholds for the district.

Table 1 – Statute and Executive Order Approach

Threshold Number	Description of Threshold
1.1	Project must reduce emissions compared to business as usual to be less than significant, two approaches: a. Project must reduce GHG emissions 33% compared to business-as-usual (2020 target) b. Project must reduce GHG emissions 80% compared to business-as-usual (2050 target)
1.2	All new projects must reduce GHG emissions compared to business-as-usual by a uniform percentage to be considered less than significant, e.g., 50%.
1.3	Projects must reduce GHG emissions compared to business-as-usual by a uniform percentage based on economic sector to be less than significant, i.e., different reductions required for different market sectors.
1.4	Uniform GHG emission reduction by region. Regional GHG reduction plan developed consistent with AB32 emission reductions, e.g., reduce GHG emissions 33% or 80% compared to business as usual. A project is not significant if its GHG emissions are consistent with plan.

Table 2 – Threshold Options

Threshold Number	Description of Threshold
2.1	This threshold employs a decision tree approach. First tier, no increase in GHG emissions, not significant. If GHG emissions greater than zero, tier two, use one of the following thresholds.
2.2	Establish a quantitative threshold based on capturing a percentage, e.g., 90%, of future discretionary projects, CAPCOA's threshold is 900 metric tons CO2e per year (equivalent to 50 houses or 30,000 square feet of commercial space, i.e., 90% of all projects are this size or greater). Projects less than this would not be significant.
2.3	This threshold is based on CARB's proposed mandatory reporting threshold of 25,000 metric tons of CO2e per year. Alternatively, use the Market Advisory Committee of 10,000 metric tons of CO2e per year. Projects less than either would not be significant.

Table 2 – Threshold Options (Concluded)

Threshold Number	Description of Threshold
2.4	This approach establishes a GHG threshold based on and analogous to a NOx/VOC criteria pollutant CEQA significance threshold and is established using the following four steps: a. Define NOx/VOC CEQA thresholds in tons per year (e.g., 10 t/yr) b. Define the regional NOx/VOC inventory in tons per year (e.g., annual NOx inventory for 2005 from 2007AQMP ~ 375,585 t/yr) c. Calculate percentage of NOx/VOC inventory the significance threshold represents (10 / 375,585 = 0.00003) to obtain "minimum percentage of regulated inventory" for NOx/VOC. d. Define California GHG emission inventory for 2004 in tons CO2e per year (499 MMT CO2e). Apply minimum percentage of regulated inventory to California GHG inventory for 2004 to develop a GHG threshold analogous to the CEQA Threshold (e.g., 0.00003 x 499 MMT = 14,970 metric tons CO2e per year = significance threshold).
2.5	Establish quantitative unit-based thresholds based on capturing a percentage, e.g., 90%, of future discretionary projects in specific market sectors (similar to 2.2 above). CAPCOA examples include: • 30,000 square-foot (SF) office =800 metric tons CO2e per year; • 30,000 SF retail = 2,500 metric tons CO2 per year: • 30,000 SF supermarket = 43,000 metric tons CO2e per year
2.6	This threshold would include tiered CEQA thresholds based on CEQA's definition of "projects with statewide, regional or areawide significance (§15206(b)), which include: • Residential development > 500 dwellings • Shopping center or business establishment employing > 1,000 persons or > 500,000 SF • Commercial office building employing >1,000 persons or > 250,000 SF • Hotel/motel > 500 rooms • Industrial, manufacturing or processing plant or industrial park employing > 1,000 persons or > 600,000 SF
2.7	Efficiency-based thresholds would be based on measurements of efficiency compared to intensity. Must be based on reasonable GHG emissions compared to business-as-usual.

CAPCOA also discusses a decision tree approach to determining significance (see Figure 1 in CAPCOA's *CEQA & and Climate Change* document). This approach establishes multiple methodologies or tiers to determine whether or not a project is significant. For example, tier 1 could be a zero threshold, e.g., does the project generate GHG emissions, if the answer is no, the project passes and is not significant. If the

project fails, it is subject to the tier 2 threshold, etc., until the project passes (not significant) or fails all tiers (significant). Some of the tiers could be equivalent to the thresholds in Tables 1 or 2.

Other potential significance thresholds are identified in Table 3.

Table 3 – Other Significance Threshold Options

Threshold Number	Description of Threshold
3.1	Establish a GHG threshold tied directly to an established CEQA criteria pollutant significance threshold. For example, using the SCAQMD's NOx significance threshold of 10 tons per year (55 pounds per day), calculate the corresponding CO2 emissions.
3.2	This threshold would establish an efficiency-based thresholds that must exceed established efficiency standards by a specified percent, e.g., 33%. This type of threshold appears to go beyond CAPCOA's 2.7 recommendation.

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