



**Threshold of Significance
Greenhouse Gas (GHG) Emissions
Industrial/Stationary Sources**

Board of Supervisors Hearing

Tuesday – May 19, 2015 – Santa Barbara



Adoption Process

- Board directs P&D to prepare GHG threshold for industrial/stationary source
 - June 2014
- P&D surveys statewide practices
 - July 2014 – January 2015
- P&D conducts two public workshops
 - February 2015
- Planning Commission considers staff recommendation of 10,000 MTCO₂e/year
 - March 25 & April 9, 2015



Background

- **Assembly Bill 32 & Executive Order S-3-05**
- **Senate Bill 97 (2007)**
- **Amendments to CEQA Guidelines (2009)**
- **Executive Order B-30-15 (April 29, 2015)**



What CEQA Requires

- **Guidelines §15064.4(b)**
 - *Disclose incremental contribution*
 - *Determine if significant cumulative impact*
 - *Determine compliance with plans*
- **Guidelines §15126.4(c)**
 - *Consider feasible mitigation*
- **Guidelines §15130(a)(3)**
 - *Consider “fair share” mitigation designed to alleviate the cumulative impact*



What CEQA Requires

- **Guidelines §15064.7 – Thresholds of Significance**
 - *Encourages, but does not require, adoption*
 - *Defines as an identifiable quantitative, qualitative or performance level measure*
 - *Allows lead agencies broad discretion, provided adoption is supported by substantial evidence*



GHG Threshold Options

- 1. Non-zero, numeric bright-line thresholds**
- 2. Zero-emission threshold**
- 3. Percentage-based reduction from BAU**
- 4. Hybrid of 1 and 3**
- 5. Performance-based standards**
- 6. Compliance with GHG reduction plan**



Planning Commission Recommendation

- **1,000 MTCO₂e/year bright-line threshold**
- **Capture rate of 99.2%**
 - 25 of 49 sources based on 2013 database
- **Does not apply to residential or commercial**
- **Considers potential for incremental growth**
- **Mitigation via onsite or offsite reductions**



Consider approval of PC's recommended threshold

- Make recommended findings
- Determine action to be exempt from CEQA
- Adopt Resolution, adding new Chapter 11, Greenhouse Gas Emissions Threshold to the *Environmental Thresholds and Guidelines Manual*