

## SANTA BARBARA COUNTY PLANNING COMMISSION

### Staff Report for Interim Greenhouse Gas Emissions California Environmental Quality Act (CEQA) Thresholds of Significance

**Hearing Date:** November 4, 2020

**Staff Report Date:** October 27, 2020

**Environmental Document:** Exempt pursuant to CEQA Guidelines Sections 15060(c)(3), 15378(b)(7), and 15064.7

**Deputy Director:** Dan Klemann

**Division:** Long Range Planning

**Supervising Planner:** Allen Bell

**Supervising Planner Phone #:** (805) 568-2056

**Staff Contact:** Selena Evilsizor Whitney

**Staff Contact Phone #:** (805) 568-3577

### 1.0 REQUEST

Hearing on the request of the County of Santa Barbara (County) Planning and Development Department (P&D) for the County Planning Commission to recommend that the Board of Supervisors (Board) adopt the proposed amendment to Chapter 11, Greenhouse Gas Emissions, of the *Environmental Thresholds and Guidelines Manual* (County of Santa Barbara, P&D, September 2020) (Attachment A, Exhibit 1) to implement interim greenhouse gas (GHG) emissions thresholds of significance (interim thresholds) in compliance with CEQA Guidelines Section 15064.4, Determining the Significance of Impacts from Greenhouse Gas Emissions.

### 2.0 RECOMMENDATION AND PROCEDURES

Staff recommends that the County Planning Commission follow the procedures outlined below and:

1. Recommend that the Board determine that the amendment to the *Environmental Thresholds and Guidelines Manual* (Attachment A, Exhibit 1) is not a project pursuant to CEQA Guidelines Sections 15060(c)(3), 15378(b)(5), and 15064.7 (Attachment B).
2. Adopt a resolution recommending that the Board amend the *Environmental Thresholds and Guidelines Manual* (Attachment A) to include new interim thresholds of significance for determining the significance of impacts from GHG emissions from land use projects and plans under CEQA.

Please refer the matter to staff if the County Planning Commission takes other than the recommended actions.

### 3.0 JURISDICTION

The County Planning Commission is considering this project based on the following:

1. Santa Barbara County Code Section 2-25.2(b)(4), which defines the powers and duties of the County Planning Commission, as the designated planning agency of the County, including: “[s]uch other applications, proposals or matters that may be specifically assigned by the board of supervisors to the county planning commission.”
2. County *Guidelines for the Implementation of the California Environmental Quality Act*, Article V, Subsection F.3.b.(1), Process for thresholds amendment and adoption, which states:

The *Environmental Thresholds and Guidelines Manual* shall be periodically amended by the Board of Supervisors, as necessary to reflect new information or changed environmental circumstances ... In accordance with Board of Supervisors authorization, the Planning Commission will hold at least one noticed public hearing to consider: ... (2) specific proposed changes to thresholds and guidelines, and/or (3) new thresholds and guidelines for additional topics ... The Planning Commission will provide direction for thresholds revisions and development of new thresholds, and will forward new or revised thresholds for final adoption by the Board of Supervisors.

#### 4.0 ISSUE SUMMARY

CEQA requires the County and other lead agencies to analyze and determine the significance of a non-exempt discretionary project's GHG emissions. The County adopted a GHG emissions threshold of significance for industrial stationary source projects (e.g., oil, gas, mining, and renewable energy projects) in 2015. However, the County does not have a threshold of significance for land use projects, land use plans, or other non-industrial stationary source projects. After the Energy and Climate Action Plan (ECAP) was adopted in May, 2015, P&D often tiered from the ECAP Environmental Impact Report (EIR) for cumulative GHG emissions when conducting project-level CEQA analysis. However, in 2017, P&D commissioned a GHG emissions inventory to track the County's progress toward its 2020 GHG emissions reduction target. The inventory concluded that the County was not on track to meet this target, indicating that mitigation measures from the ECAP were not effectively mitigating the cumulative impacts of GHG emissions. Thus, County staff no longer tiers from the ECAP's EIR for project-specific environmental review.

As part of the 2030 Climate Action Plan, County staff will propose final thresholds of significance for evaluating impacts from GHG emissions. County staff expects to complete the 2030 Climate Action Plan in 2022. In the meantime, P&D staff and its consultant, Ascent Environmental (Ascent), developed and are recommending that the Board adopt interim thresholds for non-industrial stationary source projects, to assist the County in complying with State CEQA Guidelines Section 15064.4 regarding the evaluation of impacts from GHG emissions.

Staff recommends two interim thresholds—a Screening Threshold and Significance Threshold—for land use projects and plans. The Screening Threshold equates to 300 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) per year. Projects and plans below the Screening Threshold would have an insignificant GHG emissions impact and, therefore, would not require further analysis. If a project or plan exceeds the Screening Threshold, County staff will apply the Significance Threshold. The Significance Threshold is an “efficiency” threshold of 3.8 MTCO<sub>2e</sub> per year, per the service population of the project or plan. County staff will generally conclude that a project will have a significant environmental impact due to GHG emissions if it exceeds the significance threshold.

P&D staff proposes to amend the *Environmental Thresholds and Guidelines Manual* (Attachment A, Exhibit 1) to set forth the interim thresholds and provide a step-by-step process for CEQA practitioners to apply the interim thresholds. The Interim GHG Emissions Threshold Memorandum, prepared by Ascent, provides additional details and background information supporting this change (Attachment C). The interim thresholds will help the County meet the 2030 GHG emissions reduction target set by the Board on July 7, 2020 (50 percent reduction by 2030, based on 2007 levels).

## 5.0 OVERVIEW

### 5.1 Background

#### Climate Action Planning

The County adopted the ECAP and certified an accompanying EIR in May, 2015. The ECAP set a target of reducing GHG emissions 15 percent by 2020 in the unincorporated county (using 2007 as the baseline year). The County prepared and implemented the ECAP as a plan to reduce GHG emissions in accordance with CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of Greenhouse Gas Emissions. County staff often tiered from the ECAP EIR to analyze the effects of GHG emissions in subsequent project-specific environmental documents.

In 2017, P&D commissioned a GHG emissions inventory to track the County's progress toward its 2020 GHG emissions reduction target. The inventory concluded that the County was not on track to meet this target.<sup>1</sup> Given that it is now 2020 (the ECAP's GHG emission target year) and the County does not expect to reach its 2020 GHG emissions reduction goal, County staff no longer tiers from the ECAP EIR for project-specific environmental review.

On December 11, 2018, the Board directed to update the ECAP to account for future GHG emissions reductions. The Community Services Department, Sustainability Division, initiated an update to the ECAP in July, 2020, which will be the 2030 Climate Action Plan. The Climate Action Plan will employ a regional approach and incorporate climate resiliency measures, in addition to GHG emission reduction measures, to meet the County's new GHG emissions reduction target (50 percent reduction by 2030, based on 2007 baseline levels). The Climate Action Plan will be a qualified GHG emissions reduction plan in accordance with CEQA Guidelines Section 15183.5, with a program EIR allowing for tiered review of future projects. The Climate Action Plan will incorporate final GHG emissions thresholds of significance by modifying the interim thresholds as necessary to account for future actions taken to reduce GHG emissions by the year 2030.

#### Industrial Stationary Source CEQA Threshold

On May 19, 2015, the Board adopted a numerical threshold of significance for GHG emissions from industrial stationary source facilities. The numerical threshold applies to oil, gas, mining, and renewable energy projects. All industrial stationary-source projects are subject to a numeric, bright-line threshold of 1,000 MTCO<sub>2e</sub>/year. The County considers projects with annual GHG emissions that equal or exceed the threshold to have a significant impact.

The County has not adopted GHG emission thresholds of significance for proposed projects other than industrial stationary source facilities. P&D is not amending the industrial stationary source threshold as part of the recommended interim thresholds. However, P&D staff propose minor revisions to the industrial stationary source threshold portion of the *Environmental Thresholds and Guidelines Manual* amendment in light of the ECAP's expiration. The revisions include:

- Referencing the Environmental Protection Agency's GHG Equivalencies Calculator to assist renewable energy projects in understanding potential GHG emission credits.
- Removing the requirement that the P&D Director re-examine the threshold every five years to instead state that the P&D Director "shall re-examine this threshold as needed to ensure its

---

<sup>1</sup> 2016 Greenhouse Gas Emissions Inventory Update and Forecast. Ascent Environmental, Inc. June 2018.

consistency with evolving GHG reduction progress, plans, targets, and regulations.” This revision gives the Director more flexibility to determine when changes in the best available science, environmental conditions, technology, or other conditions warrant reconsideration of the industrial stationary source threshold.

- No longer describing that industrial stationary source projects need to demonstrate compliance with the emission reduction measures of the ECAP. Industrial stationary sources that exceed the significance threshold will still be required to implement mitigation measures to reduce GHG emissions below the level of significance where feasible.

The industrial stationary source threshold portion of the *Environmental Thresholds and Guidelines Manual* may be updated, if necessary, as part of the 2030 Climate Action Plan to ensure consistency with the adopted plan.

## **5.2 CEQA Guidance on Developing GHG Emissions Analysis and Thresholds**

### **Guidance on Analyzing GHG Emissions**

Lead agencies, such as the County, must analyze the GHG emissions of non-exempt discretionary projects per CEQA Guidelines Section 15064.4, Determining the Significance Impacts from Greenhouse Gas Emissions. The County’s analysis should focus on the project’s potential effect on climate change (CEQA Guidelines Section 15064.4(b)). A project’s incremental contribution to climate change may be cumulatively considerable even if it appears relatively small compared to statewide, national, or global emissions (CEQA Guidelines Section 15064.4(b)). The County has the discretion to select the model or methodology it considers most appropriate to enable decision-makers to objectively evaluate the project’s incremental contribution to climate change (CEQA Guidelines Section 15064.4(a).1).

### **Guidance on Establishing Thresholds of Significance**

CEQA Guidelines Section 15064.7, Thresholds of Significance, encourages lead agencies to develop and adopt thresholds of significance through a public review process supported by substantial evidence. Please refer to Section 5.5, Public Outreach and Review, of this staff report regarding the interim thresholds public review process.

The CEQA Guidelines allow a lead agency to apply a threshold of significance to assess the significance of a project’s GHG emissions on the environment. The lead agency must base its judgment on scientific information and other factual data to the extent possible (CEQA Guidelines Section 15064(b)).

## **5.3 Interim Thresholds Methodology**

This section describes the methodology County staff used to develop the recommended interim thresholds. Staff prepared the interim thresholds based on the CEQA Guidelines (e.g., Section 15064), recent case law (e.g., *Center for Biological Diversity v. California Department of Fish and Wildlife*), and relevant guidance (e.g., Governor’s Office of Planning and Research’s (OPR) guidance information).<sup>2</sup>

First, P&D staff compiled historical GHG emissions data from projects approved in the unincorporated county over the past 10 years (2010-2019). Permit project data included land use or project type (e.g.,

---

<sup>2</sup> State of California Governor’s Office of Planning and Research (OPR). “Discussion Draft: CEQA and Climate Change Advisory.” December 2018.

residential, commercial) and annual unmitigated GHG emissions (if available from the project's environmental document). P&D staff evaluated over 7,000 permits to collect this project data.

For the historic projects that did not have quantified GHG emissions, Ascent used the California Emissions Estimator Model (CalEEMod) to estimate annual operational GHG emissions based on the land use or project type. Ascent staff matched each historic permit to one of nine different project types in CalEEMod (e.g., single family home, office park). Just over 65 percent of the historic projects emitted less than 100 MTCO<sub>2e</sub>/year, including all cellular tower and cannabis projects.

Ascent used the resulting list of historical projects and their estimated emissions to estimate (1) the average annual number of projects approved by the County, and (2) the average annual operational emissions associated with those projects. The County approves an average of 22 discretionary projects a year that would be subject to the interim thresholds, emitting an average of 85 MTCO<sub>2e</sub>/year per project. Ascent used these averages to represent cumulative business-as-usual emissions from anticipated new development through 2030.

Ascent then calculated the maximum allowable emissions attributable to new development that the County could permit while also attaining the County's 2030 GHG emissions reduction target. The estimated maximum allowable emissions from new development in 2030 is 24,680 MTCO<sub>2e</sub>. All new development constructed by 2030 should collectively emit no more than 24,680 MTCO<sub>2e</sub> in 2030 to be consistent with the County's 2030 GHG emission reduction target.

Next, Ascent estimated the level of future GHG emissions that future mitigation measures could reduce for projects captured by (i.e., exceeding) the significance threshold. Typically, a lead agency determines this level during climate action plan development. However, the County's 2015 ECAP is no longer used for tiering as discussed above, and County staff expects to finish the Climate Action Plan in two years. Therefore, as a proxy for GHG emission reductions anticipated from new development under the Climate Action Plan, Ascent used applicable legislation (e.g., improved energy efficiency standards for new construction) to determine the amount of potential GHG emissions reductions from new development by 2030. The applicable GHG emission reductions reduce potential future GHG emissions from new development by at least 12 percent compared to business-as-usual emission rates. A 12 percent GHG emission reduction assumption is conservative given that the 2030 Climate Action Plan may require additional reductions from new development to reach the County's 2030 GHG emissions reduction target.

P&D considered several numeric threshold alternatives ranging from 50 to 500 MTCO<sub>2e</sub>/year. P&D also considered different types of thresholds, such as numeric, efficiency, and "best management practices" (BMP) thresholds. Based on the data analysis and intent of the interim thresholds, P&D staff recommend a Screening Threshold of 300 MTCO<sub>2e</sub>/year and a corresponding Significance Threshold of 3.8 MTCO<sub>2e</sub>/year, per service population.

## **5.4 Recommended Interim GHG Emissions Thresholds**

### **Application of Interim Thresholds**

This section discusses the steps that CEQA practitioners will use to apply the interim GHG emission thresholds. Refer to Chapter 11, Greenhouse Gas Emissions, of the *Environmental Thresholds and Guidelines Manual* (Attachment A, Exhibit 1) and the Interim GHG Emissions Threshold Memorandum (Attachment C) for additional details, instructions, and background information.

### Step 1: Determine Threshold Applicability

The interim thresholds apply to non-exempt discretionary projects under CEQA; specifically, land use projects (residential and non-residential) as well as land use plans (e.g., specific plans, community plans, or master plans). As described in this staff report (above), the interim thresholds do not apply to industrial stationary sources of GHG emissions. The interim thresholds apply to the sum of a project's annual operational and amortized construction emissions (over the lifetime of the project, if known, or a default lifetime of 30 years).

### Step 2: Apply the Numeric Screening Threshold

P&D staff recommend applying a numeric Screening Threshold of 300 MTCO<sub>2</sub>e/year to non-industrial stationary source projects and plans. Staff recommends that the Screening Threshold be no greater than 300 MTCO<sub>2</sub>e per year, based on the historic permit research and the estimated effectiveness of mitigation measures for new development. The recommended Screening Threshold results in approximately 15 percent of all applicable future projects, and 87 percent of all applicable future land use emissions, being subject to the Significance Threshold. Approximately 85 percent of future projects will fall below the Screening Threshold and, therefore, will not require further analysis.

The County will strictly apply the 300 MTCO<sub>2</sub>e/year threshold as a screening threshold. The Screening Threshold is not a threshold of significance for projects that meet or exceed the screening threshold. In other words, projects that meet or exceed this emissions level may not propose mitigation measures to reduce emissions below 300 MTCO<sub>2</sub>e/year; instead, County staff shall compare those projects against the proposed Significance Threshold.

CEQA practitioners can apply the Screening Threshold either (1) qualitatively, by comparing the project's land use and size to screening criteria that correspond to the numeric threshold, or (2) quantitatively, by comparing project- or plan-specific emissions directly to the numeric Screening Threshold, as follows.

#### *Qualitative Approach*

Table 1 lists types and sizes of projects that P&D staff estimate will emit less than 300 MTCO<sub>2</sub>e/year, by the year 2030. Staff or applicants with proposed projects that are smaller than these size-based criteria can qualitatively discuss anticipated GHG emissions during the environmental review of a project. The County presumes a project that is smaller than the size-based screening criteria, absent substantial evidence to the contrary, will have an insignificant impact and will not require further analysis.

For project types not listed in Table 1, or for projects that exceed the size-based screening criteria, staff will determine the need for further GHG analysis and mitigation on a project-specific basis by using the quantitative approach described below.

**Table 1. Size-Based Project Screening Criteria**

Project Type	Size-Based Screening Criteria
Single-Family Housing <sup>1</sup>	62,000 sf <sup>2</sup>
Multi-Family Housing <sup>3</sup>	55,000 sf <sup>2</sup>
Commercial Space <sup>4</sup>	26,000 sf
Regional Shopping Center	12,000 sf
General Office Building	28,000 sf

Notes: sf = square feet.

<sup>1</sup> Single-family housing developments are defined as single-family detached homes on individual lots.

<sup>2</sup> Residential square footage refers to all inhabited square footage on the lot, including any on-site accessory dwelling units (ADUs). Do not include accessory structures (as defined in the County’s development codes). Measure residential square footage as the “gross floor area” per the County’s development codes.

<sup>3</sup> Multi-family housing developments are defined as low-rise multi-family housing complexes, modeled as “Apartments-Low Rise” in CalEEMod.

<sup>4</sup> Commercial space is modeled as “Office Park” in CalEEMod.

Source: Analysis conducted by Ascent Environmental in 2020.

### *Quantitative Approach*

CEQA practitioners choosing the quantitative approach shall use CalEEMod or another applicable GHG modeling program to model GHG emissions from the proposed project. The CEQA practitioner will compare the quantified GHG emissions against the 300 MTCO<sub>2</sub>e/year Screening Threshold. If the estimated GHG emissions are less than the Screening Threshold, the practitioner can conclude that a project would have an insignificant environmental impact, and the project would require no further analysis.

Projects that meet or exceed the Screening Threshold must compare their GHG emissions against the Significance Threshold for potential significant environmental impacts, as described in Step 3.

### Step 3: Apply the Efficiency-Based Significance Threshold

P&D staff recommend an “efficiency” type of threshold to assess the significance of GHG emissions from a land use project or plan. An efficiency threshold identifies a per-capita level of GHG emissions from new development that supports statewide reduction planning efforts.<sup>3</sup>

Projects that meet or exceed the Screening Threshold will apply the recommended efficiency-based Significance Threshold of 3.8 MTCO<sub>2</sub>e per service population, per year. Service population is the total number of residents and/or jobs anticipated to be generated by the project. Ascent based the recommended Significance Threshold on the County’s 2030 GHG emissions reduction target and demographics projections (i.e., population and employment) for the same year.

If a project or plan’s GHG emissions are less than the Significance Threshold, the County will consider the project or plan to have an insignificant environmental impact, and no further analysis is required.

Projects and plans that meet or exceed the Significance Threshold require the implementation of feasible project modifications or mitigation measures, as described in Step 4 below.

---

<sup>3</sup> Association of Environmental Professionals (AEP). “Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California, Final White Paper.” October 18, 2016.

#### Step 4 – Apply Mitigation Measures

Project modifications or mitigation will aim to avoid or reduce GHG emissions impacts to an insignificant level (i.e., below the applicable threshold of significance). Per P&D staff's request, Ascent prepared a list of potential GHG emission mitigation measures to aid CEQA practitioners (Attachment D). The list of potential mitigation measures provides options for different types of land use projects. The list is an informational resource, to be updated or revised as needed during the 2030 Climate Action Plan process.

Lead agencies should tailor mitigation measures to a project's characteristics and potential impacts. They also must present substantial evidence to support any conclusions regarding whether the mitigation measures would reduce the impacts to an insignificant level or whether the impacts would remain significant and unavoidable. If GHG emission impacts remain significant and unavoidable after including feasible mitigation measures, decision-makers would need to adopt a statement of overriding considerations in order to approve the project.

#### *Specific Project Considerations*

The interim thresholds are for general use and should apply to most discretionary projects subject to environmental review that are not industrial stationary source projects. However, the interim thresholds may not be appropriate for unique projects. In such cases, CEQA Guidelines Section 15064.7(b) allows the County to use other thresholds "... on a case-by-case basis as provided in Section 15064(b)(2)." The efficiency-based Significance Threshold may not apply to specific attributes of a unique or uncommon project or plan type. In such a case, the County can consider using the numeric screening threshold of 300 MTCO<sub>2</sub>e/year as a threshold of significance; however, the County must: (1) set forth substantial evidence in the administrative record for the project, to justify the use of a different threshold; and (2) explain how non-compliance or compliance with this threshold means that a project would result in significant or insignificant impacts, respectively. Attachment C, the Interim GHG Emissions Threshold Memorandum, provides additional detail and instruction.

#### **5.5 Public Outreach and Review**

P&D convened an advisory group consisting of staff from P&D, County Community Services Department, and Ascent. The advisory group reviewed methodologies for establishing GHG emissions thresholds, recommended different types of thresholds, and discussed potential mitigation measures. P&D conferred with the Santa Barbara County Air Pollution Control District on the project scope of work and draft deliverables. P&D staff also notified CEQA practitioners in the County Public Works Department about the draft deliverables and public outreach events.

P&D held the following public outreach events to present the draft interim thresholds:

- Public webinar on September 8, 2020
- Presentations to the following groups:
  - Building Industry Advisory meeting – August 21, 2020
  - County Sustainability Committee – September 16, 2020
  - Regional Climate Collaborative Steering Committee meeting – September 29, 2020



The September 8, 2020, public webinar was live-streamed to P&D's YouTube [channel](#) and archived there for subsequent viewing. P&D posted the materials and video from the public webinar on the project's [website](#) and emailed interested parties regarding the webinar and project materials.

## **6.0 PROJECT ANALYSIS**

### **6.1 Comprehensive Plan Consistency**

The County's Comprehensive Plan, (including the Coastal Land Use Plan and Community Plans) contains goals and policies intended to reduce GHG emissions and adapt to climate change impacts. For example, Policy 8.3 in the County's Comprehensive Plan, Energy Element, was adopted in 2015 to state:

The County shall implement the Energy and Climate Action Plan (ECAP) to reduce greenhouse gas (GHG) emissions from community-wide sources by a minimum of 15% from the 2007 baseline emissions by 2020.

Policy LU-7, Climate Change Hazards, in the Gaviota Coast Plan states that the County shall:

Support scientific studies that increase and refine the body of knowledge regarding potential climate change and related hazards including sea level rise and fire, and possible responses with incentives for voluntary support by private landowners that could include access for scientists, contribution of lands and services, funding or other support.

The Land Use Element states, "The County has initiated a number of programs which collectively encourage local reduction of greenhouse gas emissions and support the State's greenhouse gas emission mandates." The County is undertaking several projects under the "One Climate" umbrella that will update goals and policies to reduce community GHG emissions and promote climate change adaptation in the future. These current projects include the 2030 Climate Action Plan, the Climate Change Vulnerability Assessment and associated Safety Element Update, the Coastal Resiliency Project, and the Active Transportation Plan.

GHG emissions through the combustion of fossil fuels (i.e., fuels containing carbon) in conjunction with other human activities are the leading causes of climate change. The interim thresholds require mitigation of GHG emissions to avoid significantly contributing to climate change impacts. Therefore, the interim thresholds are consistent with County goals and policies intended to reduce GHG emissions and adapt to climate change, and the interim thresholds are consistent with the Comprehensive Plan.

### **6.2 Zoning: Compliance with Chapter 35 of the County Code**

Among other things, Chapter 35 of the County Code, Zoning (including the Coastal Zoning Ordinance for the Coastal Zone and the Land Use and Development Code for most inland areas), identifies permitting processes for different types of land uses and development. It differentiates which types of development are exempt from permits, require ministerial approval, or require discretionary approvals. With regard to discretionary approvals, the zoning ordinances generally require environmental review to identify the potential for significant environmental impacts, and feasible mitigation when significant impacts are identified. The interim thresholds establish standards to determine the significance of a project's impacts from GHG emissions and mitigation of those impacts, including avoidance whenever possible. The interim thresholds do not change any adopted land uses, zoning, or development standards

within Chapter 35 of the County Code. For these reasons, the interim thresholds are consistent with Chapter 35 of the County Code.

## **7.0 ENVIRONMENTAL REVIEW**

The proposed amendment to the *Environmental Thresholds and Guidelines Manual* is not a project pursuant to CEQA Guidelines Sections 15060(c)(3), 15378. And 15064.7. Therefore, environmental review is not required. Please refer to Attachment B, Notice of Exemption, for additional information.

## **8.0 APPEALS PROCEDURE**

An amendment to the *Environmental Thresholds and Guidelines Manual* requires final action from the Board and will be forwarded to the Board without an appeal; therefore, no appeal is required.

## **9.0 ATTACHMENTS**

### **A. Planning Commission Resolution Recommending Approval**

Exhibit A. Board of Supervisors Resolution to Amend the *Environmental Thresholds and Guidelines Manual*

Exhibit 1. Amended Chapter 11, Greenhouse Gas Emissions, of the *Environmental Thresholds and Guidelines Manual*

Exhibit 2. Clean copy of amended Chapter 11, Greenhouse Gas Emissions, of the *Environmental Thresholds and Guidelines Manual*

### **B. Notice of Exemption**

### **C. Santa Barbara County Interim Greenhouse Gas Thresholds Justification Memorandum, Ascent Environmental, October, 2020**

### **D. List of Potential GHG Mitigation Measures, October, 2020**