COUNTY OF SAN DIEGO

GUIDELINES FOR DETERMINING SIGNIFICANCE

CLIMATE CHANGE

LAND USE AND ENVIRONMENT GROUP

Planning & Development Services

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1. BACKGROUND

The California Environmental Quality Act (CEQA) requires public agencies to review the environmental impacts of proposed projects and consider feasible alternatives and mitigation measures to reduce significant adverse environmental effects. As part of this analysis, agencies must consider potential adverse effects that may result from a proposed project's greenhouse gas (GHG) emissions. The California Natural Resources Agency adopted amendments to the CEQA Guidelines to address GHG emissions, consistent with the Legislature's directive in Public Resources Code Section 21083.05 (enacted as part of Senate Bill (SB) 97 [Chapter 185, Statutes 2007]). These amendments took effect in 2010.

GHG emissions have the potential to adversely affect the environment because such emissions contribute, on a cumulative basis, to the significant cumulative impact of global climate change. Cumulative impacts are those that result from the combination of past, present, and probable future projects, producing related effects. The proper context for addressing GHG emissions is within an assessment of cumulative impacts because, although it is unlikely that a single project would contribute significantly to climate change, cumulative emissions from many projects could impact global GHG concentrations and the global climate system. This document is to be used to determine whether individual projects would have a considerable cumulative incremental contribution to the significant impact of global climate change.

The County's Climate Action Plan (CAP) is a long-term programmatic plan that identifies strategies and measures to meet the County's targets to reduce GHG emissions by 2020 and 2030, consistent with the State's legislative GHG reduction targets, and demonstrates progress towards the State's 2050 GHG reduction goal. The CAP has been prepared in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3) and 15183.5(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulative if it complies with the requirements of the CAP. The CAP, consistent with CEQA Guidelines Section 15183.5, includes the following components:

- Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;
- Establish a level, based on substantial evidence, below which the contribution to greenhouse gas emissions from activities covered by the plan would not be cumulatively considerable;
- Identify and analyze the greenhouse gas emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- Be adopted in a public process following environmental review.

Chapter 5 of the CAP details how the CAP complies with each of these elements.

The CAP also updates and implements General Plan Goal COS-20 and Policy COS-20.1 and mitigation measures CC-1.2, CC-1.7, and CC-1.8 of the 2011 General Plan Update (GPU) Final Program Environmental Impact Report (PEIR). Mitigation Measures CC-1.2, CC-1.7, and CC-1.8, identified in the 2011 GPU PEIR, called for the preparation of a Climate Change Action Plan designed

to reach specified GHG reduction targets from community and local government operations, modifications to the Guidelines for Determining Significance for Climate Change to provide guidance on the evaluation of GHG impacts considering current regulatory requirements and determine a project's consistency with the CAP, and adoption of a GHG Threshold of Significance. These Guidelines for Determining Significance for Climate Change (Guidelines) have been developed pursuant to the updated Mitigation Measures CC-1.7 and CC-1.8 of the 2011 GPU PEIR. The CAP document itself has been prepared to comply with the updated Mitigation Measure CC-1.2 of the 2011 GPU PEIR to mitigate the GHG impacts of the General Plan. The Guidelines were adopted by the Board of Supervisors (Board) by separate resolution concurrently with the County's CAP on [DATE], consistent with CEQA Guidelines section 15064.7.

The County's CAP is also intended to be used for future project-specific GHG emissions analyses by being prepared consistent with the tiering and streamlining provisions of Section 15183.5 of the CEQA Guidelines. The Supplemental Environmental Impact Report (SEIR) for the CAP provides the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions pursuant to CEQA Guidelines Section 15183.5(b)(2).

2. THRESHOLD OF SIGNIFICANCE

County staff will use these Guidelines as part of the environmental review process to evaluate GHG emissions for individual discretionary projects. In accordance with the 2011 GPU PEIR Mitigation Measure CC-1.7 (as updated), the Guidelines incorporate the following "threshold of significance" that was separately adopted by the Board:

A proposed project would have a less than significant cumulatively considerable contribution to climate change impacts if it is found to be consistent with the County's Climate Action Plan; and, would normally have a cumulatively considerable contribution to climate change impacts if it is found to be inconsistent with the County's Climate Action Plan.

This constitutes the threshold of significance adopted by the Board for general use as part of the County's environmental review process. In accordance with CEQA Guidelines Section 15064.7(b), the threshold of significance was developed through a public review process supported by substantial evidence, and was adopted by the Board by separate resolution concurrently with the County's CAP on [DATE].

Consistency with the CAP is determined through the CAP Consistency Review Checklist (Checklist), which is provided as Appendix A to these Guidelines. The Checklist, in conjunction with the CAP, provides a streamlined CEQA review process for proposed discretionary development projects. The Checklist is the mechanism that is used to demonstrate consistency with the CAP. If a project does not comply with required actions in the Checklist, it would be determined to be inconsistent with the CAP. The process for determining consistency with the CAP is described below.

3. CLIMATE ACTION PLAN CONSISTENCY REVIEW CHECKLIST

The purpose of the Checklist is to implement GHG reduction measures from the CAP that apply to new development projects. The CAP presents the County's comprehensive strategy to reduce GHG emissions to meet its reduction targets. These reductions will be achieved through a combination of County initiatives and reduction actions for both existing and new development. Reduction actions that apply to existing and new development will be implemented through a combination of mandatory requirements and incentives. This Checklist specifically applies to proposed discretionary projects that require environmental review pursuant to CEQA. Therefore, the Checklist represents one implementation tool in the County's overall strategy to implement the CAP. Implementation of measures that do not apply to new development projects will occur through the implementation mechanisms identified in Chapter 5 of the CAP. Implementation of applicable reduction measures in new

development projects will help the County achieve incremental reductions towards its targets, with additional reductions occurring through County initiatives and measures related to existing development that are implemented outside of the Checklist process.

The Checklist will be used during the development review process and will require reduction measures to be incorporated by individual projects. The Checklist follows a two-step process to determine if projects will have a significant cumulative impact under the County's adopted GHG threshold of significance.

Step 1 in the Checklist assesses a project's consistency with the growth projections and land use assumptions made in the CAP. Projections provide insight into the scale of reductions needed to meet reduction targets. Emissions for future years were estimated based on anticipated growth, as provided in the County's General Plan. If a project is consistent with the projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP's projections and would not increase emissions beyond what is anticipated in the CAP or inhibit the County from reaching its reduction targets. Emissions from a project consistent with the General Plan have been accounted for in the CAP and the project's implementation of the applicable CAP reduction measures will contribute towards reducing County emissions. As a result, a project that is found to be consistent with the CAP, would result in less than significant GHG emissions and would not result in a cumulatively considerable contribution to a GHG impact.

If a project is consistent with the existing General Plan land use designation(s), it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the Checklist. However, some projects that are inconsistent with existing General Plan land use and zoning designations may be consistent with the CAP's projections. For example, if a project includes a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations, it would still be within the projections assumed in the CAP and can move forward to Step 2 of the Checklist because it would not increase GHG emissions beyond CAP projections. Estimated GHG emissions under the existing and proposed designations would need to be provided to support this conclusion. Emissions must be quantified using the guidance described in the County's Report Format and Content Requirements for Climate Change document provided under separate cover.

If a land use and/or zoning designation amendment results in a more GHG-intensive project, the project is required to demonstrate consistency with applicable CAP measures and offset the increase in emissions in accordance with the recommended methodologies in Section 4 below.

Step 2 of the Checklist identifies CAP GHG reduction measures that would apply to discretionary projects and establishes clear questions that can be used to assess a project's consistency with CAP measures. The specific applicable requirements outlined in the Checklist, shall be required as a condition of project approval. The project must provide substantial evidence that demonstrates how the proposed project would implement each applicable Checklist requirement described in Appendix A to the satisfaction of the Director of Planning & Development Services (PDS). If a question in the Checklist is deemed not applicable (N/A) to a project, substantial evidence must be provided to the satisfaction of the Director of PDS.

4. PROCEDURES FOR GENERAL PLAN AMENDMENTS

In-process and future General Plan Amendment (GPA) projects that may intensify GHG emissions over existing designations are required to prepare a detailed quantitative GHG analysis. The processes for both new GPAs and in-process GPAs (i.e., project applications deemed complete prior to CAP Draft SEIR Notice of Preparation date of October 20, 2016) are identified below.

General Plan Amendment projects that intensify GHG emissions beyond current designations are required to provide additional analysis beyond the Checklist. As specified in Mitigation Measure GHG-1 of the CAP's SEIR, the County shall require GPAs to reduce their emissions to ensure that CAP emission forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved. Project applicants for GPAs could accomplish this through two options:

- **Option 1:** GPA projects shall achieve no net increase in GHG emissions from additional density above the 2011 GPU. Applicants shall be required to quantify the GHG emissions from their projects that exceed the GHG emissions for the 2011 GPU densities or intensities forming the basis of the CAP forecasts. This increase in emissions shall be reduced by demonstrating compliance with relevant CAP measures as identified in the Checklist first. Any additional emission reductions needed shall then be achieved through onsite design features and mitigation measures, followed by offsite mitigation. Offsite mitigation, including the purchase of carbon offset credits, would be allowed after all feasible onsite design features and mitigation measures have been incorporated.

- **Option 2:** GPA projects shall reduce all project GHG emissions to zero to achieve no net increase over baseline conditions (carbon neutrality). Project emissions shall be reduced to zero through onsite design features, mitigation measures, and offsite mitigation, including purchase of carbon offset credits. Applicants shall demonstrate compliance with relevant CAP measures as identified in the Checklist first. Any additional emission reductions needed shall then be achieved through onsite design features and mitigation measures, followed by offsite mitigation. Offsite mitigation, including purchase of carbon offset credits, would be allowed after all feasible onsite design features and mitigation measures have been incorporated.

Project specific mitigation measures, which would be in addition to all CAP Checklist items and all feasible on-site project design features, must include specific, enforceable actions to reduce project emissions, and an analysis is required to show the emission reductions achieved from each measure. Each mitigation measure should include references or a logical, fact based explanation as to why a specific mitigation measure would achieve the stated reductions. Mitigation measures and/or design features must be supported with substantial evidence showing impacts have been reduced as described in Options 1 and 2 above.

Many local, regional, and State agencies have produced lists of feasible mitigation measures and strategies that can be used to reduce GHG emissions. These lists can be consulted when developing feasible mitigation measures for projects within the County, including, but not limited to:

- Governor's Office of Planning and Research CEQA and Climate Change. 2008. Technical Advisory. CEQA AND CLIMATE CHANGE: Addressing Climate Change through California Environmental Quality Act (CEQA) Review. See Attachment 3, "Examples of GHG Reduction Measures." Available: http://opr.ca.gov/docs/june08-ceqa.pdf.

- California Air Pollution Control Officers Association (CAPCOA). 2008 (January). CEQA & Climate Change. Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. See page 79, "Mitigation Strategies for GHG." Available: http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-White-Paper.pdf.

- California Air Pollution Control Officers Association (CAPCOA). 2010 (August). Quantifying Greenhouse Gas Mitigation Measures. A Resource for Local Government to Assess Emission Reduction from Greenhouse Gas Mitigation Measures. Available: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.

- Attorney General of the State of California. 2008 (December) [revised January 2010]. The California Environmental Quality Act. Addressing Global Warming Impacts at the Local Agency Level. Available: http://ag.ca.gov/globalwarming/pdf/GW_mitigation_measures.pdf.

Offsite mitigation that may include carbon offsets must comply with the requirements outlined in the CAP's SEIR Mitigation Measure GHG-1, which details sources of carbon offsets, standards for acceptable carbon offsets, and the County's preferred geographic hierarchy for implementation.

Contents of Climate Change Analysis Reports

Guidance for project-specific GHG Technical Reports is outlined in the Report Format and Content Requirements for Climate Change document, provided under separate cover. The Report Format and Content Requirements document provides guidance on the outline and content of GHG analyses for discretionary projects processed by PDS that cannot show compliance with the CAP Checklist.

5. MONITORING AND UPDATE MECHANISMS

The County will prepare a CAP update every five years beginning in 2025. The CAP update will include updated baseline inventories, adjustments to reduction measures, as necessary, and any changes to land use projections, to achieve consistency with zoning and then-current General Plan land use designations and policies. Comprehensive updates to these Guidelines and associated Checklist will be coordinated with each CAP update and are subject to approval by the Board. Future updates to the CAP, Guidelines, and Checklist will comply with CEQA.

In addition to the updates to these Guidelines and Checklist that are coordinated with the comprehensive CAP updates every five years, the Guidelines and Checklist may also be administratively updated in the interim by the County to comply with amendments to State laws or court directives, or to remove measures that may become mandatory through future updates to State or local codes. Administrative revisions to the Guidelines and Checklist will be limited to changes that do not trigger a subsequent EIR or a supplement to the SEIR for the CAP pursuant to CEQA Guidelines Section 15162. Administrative revisions, as described above, will not require approval by the Board. All other changes to the Guidelines and Checklist require Board approval.