

# CEQA GHG Significance Determination

Air & Waste Management Association (AWMA)

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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

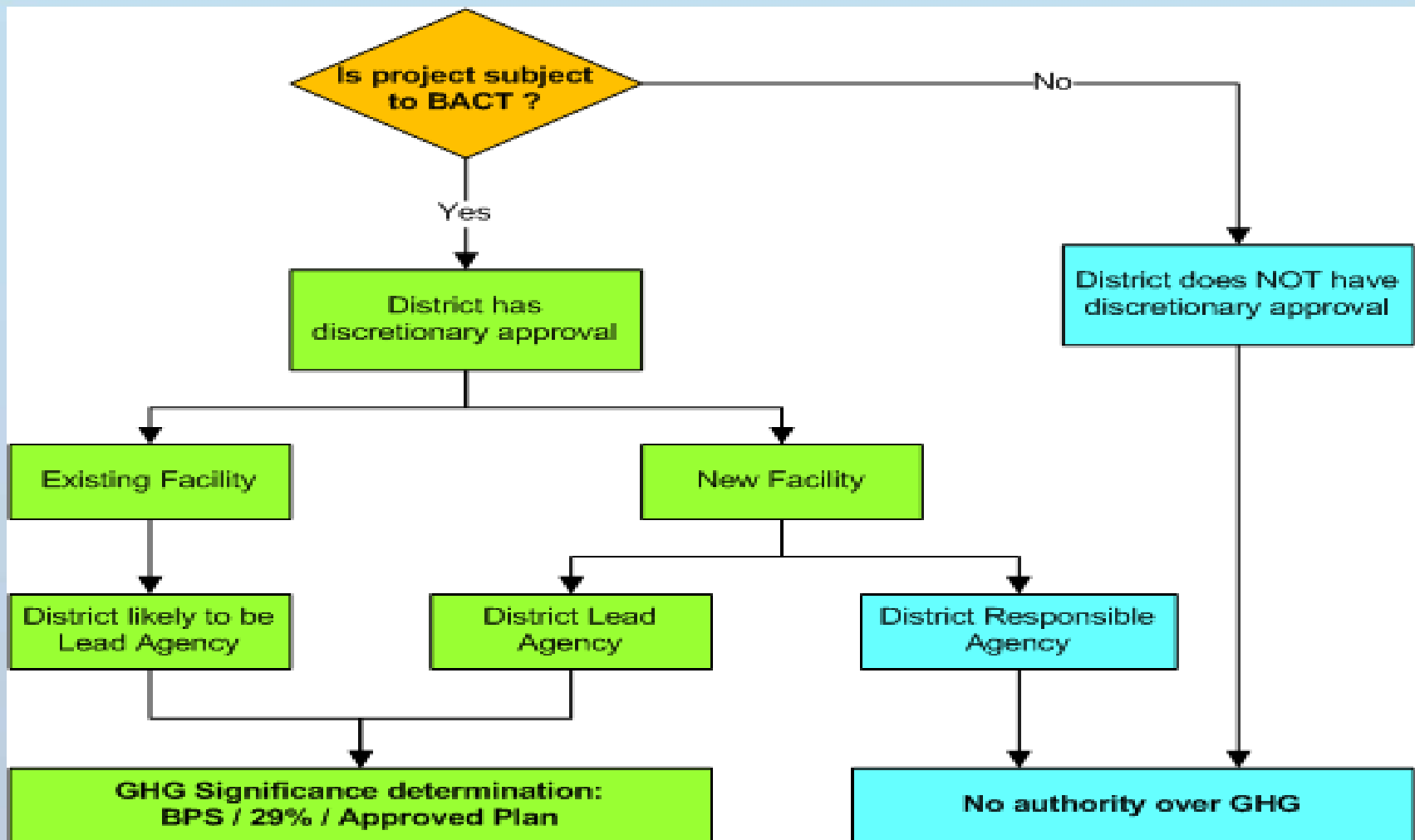


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# District Permitting Actions

- Per CEQA, projects subject to discretionary approval are subject to CEQA provisions
- District issuance of permits for projects subject to BACT is a discretionary approval
- Every permit application project undergoes a CEQA review (*1,800 projects in 2010*) to determine the appropriate level of environmental analysis

# District CEQA Review Process



# District CEQA Roles

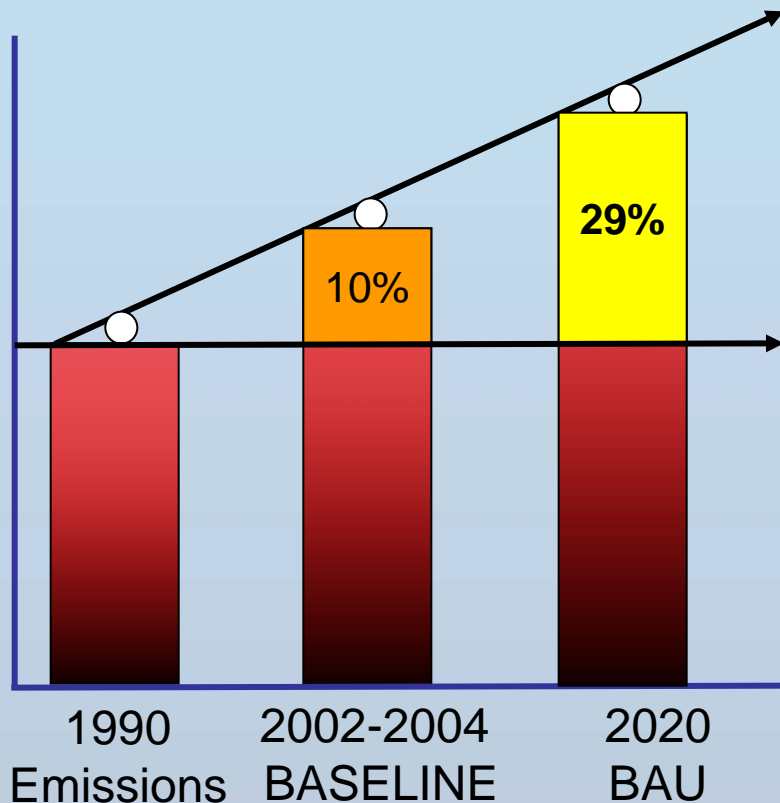
- **District Lead Agency:** Permit application project undergoes a CEQA review, including GHG significance determination (*District CEQA GHG Policy*)
- **District Responsible Agency:** District does not have statutory authority over GHG emissions. Therefore, District relies on Lead Agency's GHG analysis
- **District Commenting Agency:** District does not have statutory authority over GHG emissions and relies on Lead Agency's CEQA GHG analysis. Therefore, the District does not comment on Lead Agency's GHG analysis (*District CEQA GHG Guidance*)

# SJV Approach

## Performance Based Approach

- Projects with GHG emission reductions consistent with the State's legislative mandates would be determined to have a less than significant impact on global climate change
- Goal is to meet AB32 GHG emissions reduction target
- District Policy requires evaluation of GHG emission reductions achieved through implementation of BPS

# Baseline & Business As Usual (BAU)



- Baseline is a 3-year average GHG emission inventory for the 2002-2004 period
- BAU is a projection of the baseline emissions inventory reflecting anticipated growth by the year 2020
- ARB's 29% reduction target is from BAU
- Projects occurring after the Baseline period may already have achieved GHG reductions

# GHG Significance Threshold

## Performance Based Standards

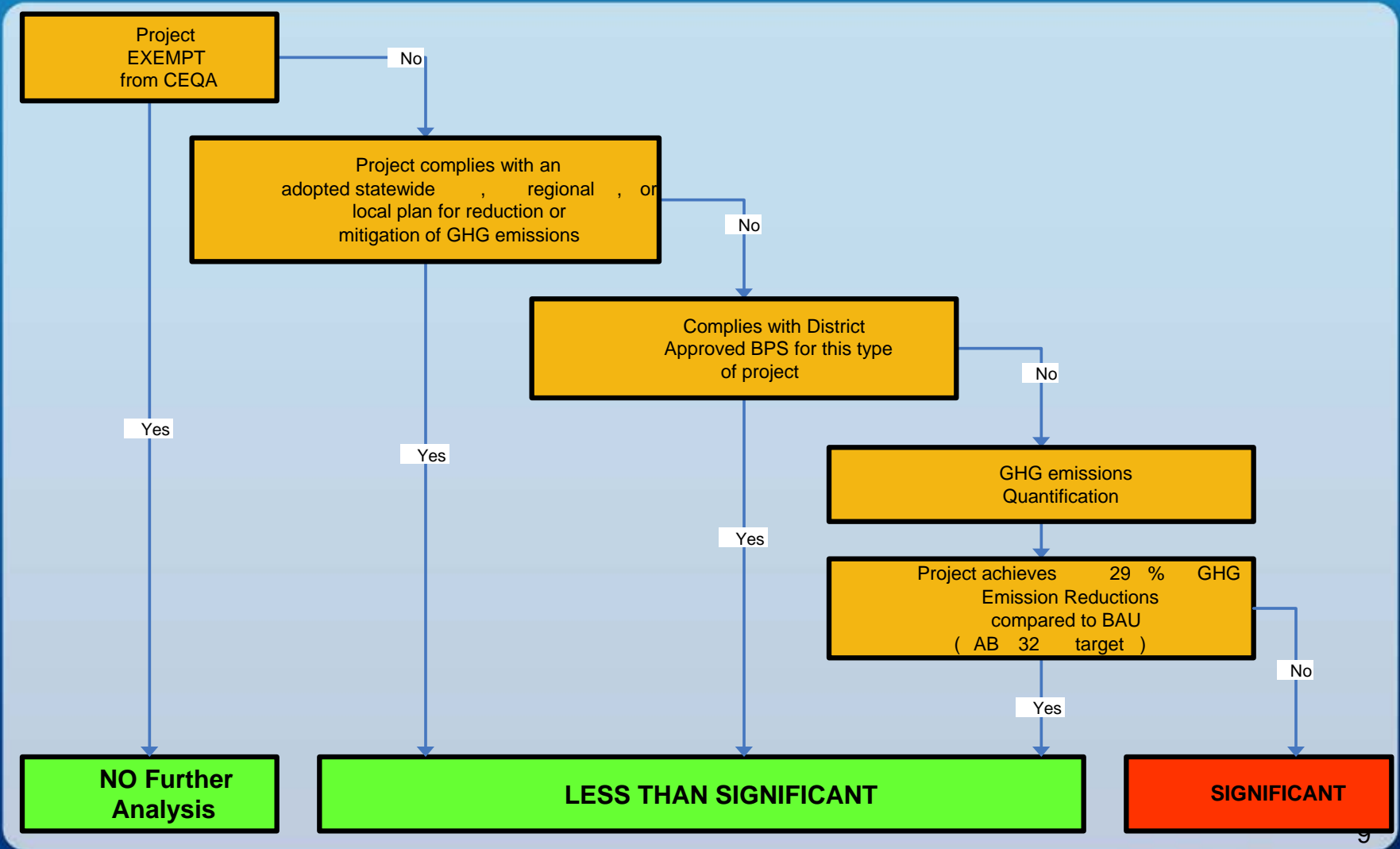
- When the District is the Lead Agency for CEQA purposes, all projects with increase in GHG emissions would be subject to significance determination for GHG emissions impact.
- The District's use of performance based standards is a method of determining significance of project specific GHG emissions using established specifications or project design elements:

### **Best Performance Standards (BPS)**

# Best Performance Standards

- **BPS Stationary Source Projects**
  - Best GHG controls that have been achieved on a given type of source of GHG emissions (technology, energy efficiency, etc.)
  - Achieved-in-Practice
  - Pre-quantified GHG emission reductions
- **BPS Development Projects**
  - At least 29% GHG emission reductions compared to BAU (AB32 target)
  - Any combination of District approved measures
  - Achieved-In-Practice

# BPS – Implementation



# BPS - Implementation

- **Projects Implementing BPS:** *Streamlined process*
  - GHG emission reductions pre-quantified
  - No additional quantification of GHG required
  - GHG impacts deemed less than significant
- **Alternative to BPS:** *Project specific analysis*
  - Must quantify project specific GHG emissions
  - May demonstrate equivalency to approved BPS
  - May reduce or mitigate GHG emissions by 29% compared to BAU to be deemed less than significant

# BPS – District Experience

- BPS
  - Streamlined process
  - 15 source categories addressed
  - Takes time up front, but expedites subsequent reviews
  - Transparent for ATC project applicant
- Projects specific determination
  - Alternative offered to applicant
  - Takes time at the project level
- Zero equivalency policy: Project emitting less than 230 ton-CO<sub>2e</sub>/yr
- Construction related GHG emissions: Amortized over project life
- Achieved real GHG emission reductions

**Overall positive experience**

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# Contact Information

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