

## County of Santa Barbara

### Support for Use of Bay Area Air Quality Management District Greenhouse Gas Emissions Standards

This memorandum discusses factual background and justification for the County's interim reliance on thresholds of significance for GHG emissions developed and proposed by the Bay Area Air Quality Management District (BAAQMD). The County is presently working to develop an inventory of current GHG emissions and a Climate Action Strategy and Climate Action Plan based on this data. Until County-specific data becomes available and significance thresholds applicable to GHG emissions are developed and formally adopted, the County has developed interim procedures that rely on the proposed BAAQMD standards. While Santa Barbara County land use patterns differ from those in the Bay Area as a whole, Santa Barbara County is similar to certain Bay Area counties (in particular, Sonoma, Solano, and Marin) in terms of population growth, land use patterns, General Plan policies, and average commute patterns and times. Because of these similarities, the methodology used by BAAQMD to develop its GHG emission significance thresholds, as well as the thresholds themselves, have applicability to Santa Barbara County and represent the best available interim standards for Santa Barbara County.

#### A. Summary of BAAQMD Methodology

The BAAQMD has developed a methodology and significance thresholds for GHG emissions using the emission reduction goals of AB 32 while taking into account the emission reduction strategies outlined in the Scoping Plan. BAAQMD proposes thresholds for both land use projects (stationary and non-stationary sources) and plans. Using the emission reductions levels required to meet the goals of AB 32, BAAQMD identified two methods and thresholds for land use projects. The first threshold is based on a gap analysis and the second threshold is based on what would be considered a GHG-efficient project. The BAAQMD also established thresholds for land use plans based on the GHG-efficient method. Thresholds for stationary sources were established using a separate method specific to stationary source polluters.

##### 1. Project-Level Thresholds

###### *The Gap Analysis Approach*

This approach focuses on a limited set of State mandates that appear to have the greatest potential to reduce land use development related GHG emissions. The BAAQMD's eight steps in determining the threshold are outlined below.

- 1) Determine growth in emissions attributable to land use driven sectors.
- 2) Estimate the anticipated GHG reductions affecting the same land use-driven emissions sectors associated with the AB 32 Scoping Plan.



10% of new permits would actually hit this threshold. Thus the threshold captures the large significant polluters.

## **2. Plan-Level Thresholds**

Plans would be considered to have less than significant GHG emissions if they are:

- 1) Consistent with a locally adopted GHG Reduction Plan or Climate Action Plan
- 2) Less than the efficiency threshold identified for plan level GHG impacts, 6.6 MT CO<sub>2</sub>e/California Service Population/yr (residents + employees). This efficiency threshold was calculated using all emissions sectors, rather than just the land use based sectors as was done for project level thresholds. This difference is due to the fact that plans are comprised of more than just land use related emissions (e.g. industrial).

### **B. Reasoning for Santa Barbara County Reliance on BAAQMD Standards**

Until the County of Santa Barbara has formally adopted thresholds of significance for GHG emissions, the County must look to other jurisdictions with similar characteristics for guidance in the interim. A lead agency may consider thresholds of significance adopted or recommended by other public agencies, provided they are supported by substantial evidence. CEQA Guidelines Section 15064.7(c). Currently the BAAQMD is the first air quality management district to have formally adopted GHG thresholds. As described above, BAAQMD's thresholds are based on a sound, factually supported methodology. While land use patterns in Santa Barbara County are different from the Bay Area as a whole region, the BAAQMD does contain county jurisdictions very similar to Santa Barbara County. Santa Barbara County and several Bay Area counties have similar demographics, land use patterns, and behaviors, while other Bay Area counties are quite different in these characteristics. Given that the BAAQMD's adopted thresholds provide the best and most defensible significance criteria available at this time, the County proposes to refer to the BAAQMD thresholds for determinations of impact significance with respect to GHG emissions as an interim measure. Once data is available on GHG emissions for Santa Barbara County, a locally based analysis will be conducted to update the significance criteria.

To the extent that Santa Barbara County is similar to certain counties in the Bay Area with similar land use patterns and past population growth rates, Santa Barbara County can be expected to continue to grow in a similar fashion to these Bay Area in the future as well. Examining land use policies in General Plans in the two regions, which guide growth in the future, provides support for this conclusion. Given that the two regions would be expected to have similar future growth, the forecast for future land use development in BAAQMD's gap analysis threshold methodology should also generally apply to Santa Barbara County, such that the BAAQMD thresholds would also be relevant to Santa Barbara County. It should be noted that this methodology also applies in blanket fashion to areas that are very different from Santa Barbara County.

The BAAQMD encompasses all of Alameda, Contra Costa, Marin, San Francisco, San Mateo, Santa Clara, and Napa Counties as well as the southwestern portion of Solano County and southern Sonoma County.

**Interim GHG Emissions – Evidentiary Support** 3

**Santa Barbara County Planning & Development Department**

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**EXHIBIT I**



Table 1. Bay Area and Santa Barbara County Characteristics<sup>234 5</sup>

County	Population (2010)	% Change in Population (2009-2010)	Average Annual Growth Rate (2000 – 2009)	Average Household Size <sup>6</sup>	Average Commute Time (minutes)	Daily VMT (millions)
Santa Barbara	434,481	1	0.86	2.73	20	9.7
Napa	138,917	0.9	1.13	2.63	24	4.5
<b>Marin</b>	<b>260,651</b>	<b>0.8</b>	<b>0.5</b>	<b>2.36</b>	<b>29</b>	<b>6.2</b>
<b>Solano</b>	<b>427,837</b>	<b>0.5</b>	<b>0.79</b>	<b>2.9</b>	<b>30</b>	<b>7.2</b>
<b>Sonoma</b>	<b>493,285</b>	<b>1.2</b>	<b>0.67</b>	<b>2.53</b>	<b>25</b>	<b>10.6</b>
San Mateo	754,285	1.2	0.61	2.74	25	19.4
San Francisco	856,095	1.1	0.96	2.42	29	12.4
Contra Costa	1,073,005	1.1	1.24	2.76	32	25.7
Alameda	1,574,857	1.1	0.86	2.75	28	38
Santa Clara	1,880,876	1.3	1.12	2.91	24	40.1

The efficiency-based approach applies to the entire State of California since the threshold which was calculated is based upon the State’s greenhouse gas emissions inventory and population growth and

<sup>2</sup> 2006 -2008 American Communities Survey

<sup>3</sup> Source: Inventory of Bay Area Greenhouse Gas Emissions, BAAQMD, 2010

<sup>4</sup> Vision 2030: SBCAG 2008 Regional Transportation Plan

<sup>5</sup> California Department of Finance

<sup>6</sup> 2006 -2008 American Communities Survey



emissions that would be captured from stationary sources in Santa Barbara County by this threshold cannot be determined with specificity.

However, insofar as Santa Barbara County is similar to the four air districts listed in Table 3, this high capture rate should hold true for Santa Barbara County as well. Santa Barbara County is located adjacent to the SCAQMD district, with that district including neighboring Ventura County. Additionally, Santa Barbara County, SCAQMD and BAAQMD are all coastal regions. As discussed above, BAAQMD contains many of the same types of stationary source polluters as Santa Barbara County. Given these factual similarities, the BAAQMD's rationale for a 10,000-metric ton significance criterion for stationary sources also applies to Santa Barbara County.

### **C. Conclusion**

Given the similar population growth, land use patterns, General Plan policies, and behaviors such as average commute time that exist between these two regions, Santa Barbara County's future land use development can be shown to be similar to the Bay Area counties within the BAAQMD's jurisdiction discussed above. Relying as an interim measure on BAAQMD's gap analysis threshold methodology and significance thresholds for GHG emissions can therefore be justified. Because they are not based on region-specific data, the efficiency-based standards are applicable statewide.

