



**Minutes for the GHG CEQA Significance Threshold  
Stakeholder Working Group #10  
Wednesday, April 22, 2009  
SCAQMD, Room GB, 10:00 AM – 12:00 PM**

**1. Welcome and Introductions**

Dr. Steve Smith, Program Supervisor of the CEQA section in SCAQMD's Planning Rule Development and Area Sources Division, called the meeting to order at 10:00 A.M. and asked for self introductions of the working group members and SCAQMD staff.

**2. GHG Work Plan Presentation**

Dr. Smith gave an overview of the draft work plan for surveying CEQA documents to obtain GHG emissions data on residential, commercial and mixed use projects occurring within SCAQMD's jurisdiction.

**Comments/Questions on GHG Work Plan**

- A working group member asked if the Work Plan will consider a “proportionate approach” or “per capita approach” to help forecast the 2020 GHG inventory by considering localized impacts (criteria pollutants). The BAAQMD is attempting to project what the 2020 inventory would be, but they are not there yet. Dr. Smith stated that the 2020 inventory is part of another work plan and criteria pollutants are not the driving factor for the GHG Work Plan. Further, if the surveyed CEQA documents do not quantify the GHG emissions, the URBEMIS model will be used to calculate the GHG emissions.
- A working group member asked for a clarification of what “normalizing data” means and expressed concern that normalizing data to fit a normal distribution curve pre-supposes the data. Dr. Smith explained that normalizing the data and rejecting the outliers is more about quality control and verifying that the calculations are correct and less about pre-judging the data and attempting to fit it into a normalized curve.
- Several working group members were confused about why industrial sources are included in the work plan since the SCAQMD already established a GHG significance threshold for industrial sources. Dr. Smith explained that the industrial data is being captured for informational purposes as part of SCAQMD's rule development efforts for proposed Rule 2301 but the industrial data will not be included in the GHG Work Plan analysis for residential and commercial projects.
- A working group member commented that the Work Plan is vague enough and specific enough but that the real focus should be on evaluating the strengths and weaknesses of the data when it becomes available. The working group member also expressed concern that the trip length defaults in the URBEMIS model were not accurate and were not being applied properly. Dr. Smith explained that the trip length default data was provided by SCAG bases on the four categories of trips (work trips, to and from,

etc.) and that the trip lengths can be entered to customize it to a specific project. Dr. Smith agreed to provide the working group with the raw data that was used to establish the default trip length data.

- A working group member suggested that the electricity use factors should be updated to reflect the CEC's staff report from November 2007 which has different residential use factors for electricity than what is currently presented in the Work Plan.
- A working group member commented that the current modeling capabilities need to be improved. For example, it was suggested that there needs to be more "scalability" in the URBEMIS model to allow for more nuances and better data refinement. Similarly, the EMFAC model looks at a wide region with defaults to emission factors for the national average, which could result in much higher, more conservative emissions than what is really occurring in SCAQMD's jurisdiction. Dr. Smith responded that the GHG Work Plan has nothing to do with EMFAC and that SCAQMD is looking for guidance from CARB on the appropriate GHG emissions factors to use. CARB staff responded that their GHG emission factors are expected to be made available by the end of the year. Dr. Smith continued by explaining that the URBEMIS model has a specific purpose and it is not meant to be used for regional analyses. The upgrades to the URBEMIS model have been focusing on incorporating GHG emission factors, where available. Barbara Baird also mentioned that SCAQMD is required by statute to use emissions factor from SCAG and CARB.
- A working group member commented that the data for Riverside County might be skewed more towards commercial projects because the planning department is seeing a pattern of CEQA exemptions for smaller projects. Another working group member stated that the data for San Bernardino County may also be skewed because it includes unincorporated areas, but not the incorporated areas encompassing 24 cities.
- A working group member asked if the GHG Work Plan includes a category for sanitation districts and Dr. Smith confirmed that it does and that the threshold would be the same as for other industrial projects in SCAQMD's jurisdiction where the SCAQMD is the lead agency (e.g., 10,000 MT/year of GHGs). Another working group member pointed out that lead agencies, other than the SCAQMD, can choose their own threshold.
- Several working group members commented that 285 projects may not really be a representative sample and wanted to know what the total number of projects would be. Dr. Smith replied that the higher the percentage, the better the sample, but the actual number of projects is not important as long as the projects surveyed are representative to establish a balanced sampling. He added that industrial information is part of the dataset and will be analyzed separately as part of the PR 2301 study. However, the interim GHG threshold that SCAQMD has already established for industrial sources is close to the goals of AB32.
- A working group member inquired about whether the BAAQMD had made any of their GHG evaluation efforts public. Dr. Smith replied that he had not heard of anything

made available at this time, but he noted that they are in a data collection process by examining approximately 2,000 CEQA documents. It was recommended by a number of working group members to obtain the BAAQMD dataset to be included in the residential/commercial project survey. However, different local factors, such as VMT and fleet mix in SCAQMD, would need to be applied.

- A working group member expressed concern that the 2008 data set, especially for commercial versus residential, may not be appropriate considering the economic downturn in the last half of 2008.
- A working group member inquired if projects were being separated by build-out year.
- A working group member said he would need to see the data to provide more specific feedback to see how all the emissions were calculated. Dr. Smith said that issue will not be addressed at this point because the Work Plan is a data collection exercise.
- A working group member asked another working group member about whether GHG emissions from school projects are being double-counted and the response was yes, the GHG emissions are grossly overestimated and suggested that the SCAQMD establish some guidelines. For example, the URBEMIS model estimated GHG emissions at 60,000 MT/year but when you conduct hand calculations, the actual GHG emissions from the project would be closer to 1,000 MT/year.
- A working group member mentioned that if the data set is based mostly on everyone using the URBEMIS model, then the data will be more reflective of the threshold that would apply. Another working group member added to this concept by saying that we need to start somewhere with appropriate assumptions that exist from other agencies but admitted that we do not have the time or budget to get overly specific information to do this on a county-wide level.

### **3. Recent GHG Activities by Other Agencies**

Dr. Smith gave a brief overview of the recent GHG activities by OPR, BAAQMD and SJVAPCD.

#### **Comments/Questions**

- OPR updated the working group about their proposed revisions to the CEQA Guidelines which were submitted to the Resources Agency. The proposed revisions did not include a specific GHG threshold. Instead, the proposed revisions state that the GHG analysis can be comprised of qualitative or quantitative analyses or performance-based standards, provided that the analysis is based on substantial evidence. The development of CARB's GHG threshold is on the "back burner."

- Barbara Baird explained that EPA's proposal would find that GHG emissions contribute to the endangerment of public health and safety, along with vehicle emissions.
- A working group member mentioned that SJVAPCD is working on developing an ERC program for GHGs.

#### **4. Other Topics**

CAPCOA has a subcommittee that is apparently developing a work plan that will contain emission factors, performance standards, etc. This subcommittee will, via their consultant, compile mitigation measures that SCAQMD will eventually adopt.

- A working group member requested that this working group be provided with a draft version of CAPCOA's workplan before finalizing anything. Another working group member suggested that CAPCOA be invited to a future working group meeting to give a presentation followed by a Q&A period since the working group members are practitioners and have a stake in the outcome of CAPCOA's decisions. The challenges in being able to do that were highlighted.

#### **5. Closing Remarks**

Dr. Smith offered an invitation for working group members who are interested in the GHG inventory, to attend an inventory subcommittee meeting on a voluntary basis. The inventory subcommittee is scheduled to meet one hour earlier than the GHG Working Group. The next working group meeting is scheduled for May 27, 2008 at 10:00 am in SCAQMD conference room GB; the inventory subcommittee will meet on the same day, same room, same conference call-in number, but at 9:00 am.

#### **6. Other Business**

None.

#### **MEMBERS PRESENT (15)**

Greg Adams - Sanitation Districts of Los Angeles County

James Arnone – Latham & Watkins – *on conference call*

Doug Feremenga - San Bernardino County Land Use Planning Department

Patrick Griffith for Greg Adams - Sanitation Districts of Los Angeles County

Andy Henderson for Mark Grey – Building Industry Association of Southern California (BIA/SC)

Michael Hendrix – Association of Environmental Professionals

Julia Lester – Diaries/California Farmers Bureau

Clayton Miller – Construction Industry Air Quality Coalition (CIAQC)

Bill Piazza - Los Angeles Unified School District (LAUSD)

Terry Roberts – Office of Planning and Research (OPR) – *on conference call*

Jennifer Schulte for Shari Libicki – Green Developers Coalition

Debbie Stevens - Refineries

Cindy Thielman-Braun for Mike Harrod – Riverside County Planning Department

Matt Vespa – Center for Biological Diversity (CBD) – *on conference call*

Lee Wallace – Southern California Gas Co/San Diego Gas and Electric (SCG/SDGE)

Michael Wang for Cathy Reheis-Boyd – Western State Petroleum Association (WSPA)

**OTHERS PRESENT (12)**

Curtis Coleman – Southern California Alliance

Charanya Varadarajan – AECOM

Sue Gornick – British Petroleum (BP)

Frances Keeler - Keesal, Young and Logan

Sung Key Ma – Riverside County Water Management District (RCWMD)

Haseeb Qureshi - Urban Crossroads

Samantha Unger – Evolution Markets

Emily Fink – Evolution Markets

Adam Moke – City of Los Angeles, Dept. of Public Works/Bureau of Sanitation

Rene Silva – Inland Empire Utilities Agency

Bettina Arrigoni – Global Energy Partners – *on conference call*

**AQMD STAFF (5)**

Barbara Baird, District Counsel

Steve Smith, Ph.D., Program Supervisor

Mike Krause, Air Quality Specialist

Barbara Radlein, Air Quality Specialist

Daniel Garcia, Air Quality Specialist