

Memo



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To: Mike Strong, City of Escondido

From: Ricky Williams, Alyssa Way, and Poonam Boparai

Subject: Guidance for Demonstrating Consistency with the City of Escondido Climate Action Plan for Discretionary Projects Subject to CEQA

Attachments: Attachment A – Screening Level Threshold Calculation Worksheets
Attachment B – Numerical Threshold Calculation Worksheet

The City of Escondido (City) adopted an updated Climate Action Plan (CAP) in **[Insert Date of CAP Adoption by resolution number XX]**. The CAP outlines strategies and measures that the City will implement to achieve its proportional share of State greenhouse gas (GHG) emissions reduction targets. The CAP is a plan for the reduction of GHG emissions in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

The City has also developed a Climate Action Plan Consistency Review Checklist (CAP Consistency Checklist), in conjunction with the CAP, to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. This memorandum summarizes the methodology and application of a GHG screening threshold (set at **500 metric tons carbon dioxide equivalent [MTCO₂e] per year**) for new development projects in order to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Checklist. The memorandum also describes application of a numerical GHG threshold (set at **2.0 MTCO₂e per service population per year**) for use as a supplemental method for demonstrating consistency with the CAP.

I. Climate Action Plan Summary

This City's CAP contains a baseline inventory of GHG emissions for 2012, business-as-usual (BAU) projections of emissions to 2030 and 2035, a calculation of the City's targets based on a reduction from the 2012 baseline, and emission reductions with implementation of the CAP.

The city emitted approximately 943,000 MTCO₂e in 2012. Accounting for future population and economic growth, the city is anticipated to generate GHG emissions of 833,000 MTCO₂e in 2030 and

841,000 MTCO₂e in 2035. The CAP sets targets to achieve a 42 percent reduction from the 2012 baseline levels by 2030 and a 52 percent reduction from the 2012 baseline levels by 2035. The City's GHG reduction targets are consistent with the California Air Resources Board's (CARB's) recommendations and the methodology identified in the San Diego Association of Government's (SANDAG's) Regional Climate Action Planning Framework (ReCAP) for setting community-wide targets. Therefore, the City must implement strategies and measures that reduce emissions to 547,000 MTCO₂e in 2030 and 456,000 MTCO₂e in 2035.

The CAP accounts for GHG emission reductions that would be achieved through State and federal actions. Under the "Legislatively-Adjusted" BAU projection, it is estimated that the city would generate 608,000 MTCO₂e in 2030 and 578,000 MTCO₂e in 2035 when accounting for State and federal actions. The City would need to implement additional actions to meet the 2030 and 2035 emissions target. The CAP includes GHG reduction strategies and measures to achieve the City's 2030 and 2035 target.

In meeting the City's 2030 targets, the City demonstrates consistency with the State's reduction goal identified in Senate Bill 32. Meeting the 2035 target, which aligns with the City's General Plan horizon year, will demonstrate that the City is on a trajectory to reduce its proportional share of GHG emissions in support of the 2050 State goal identified in Executive Order S-3-05. Future actions anticipated by State and federal agencies would reduce the need for local measures and help ensure broader participation in emission reduction efforts.

The City's ability to grow its population and economy while meeting the GHG reduction targets will require broad-based participation from the entire community. Everyone who lives, works, shops, or recreates in the city contributes to the community's GHG emissions and will need to be part of the solution. This includes new development that is anticipated in the City through 2035. The CAP is intended to achieve reductions from existing and new sources. This is emphasized by the fact that the City's reduction targets are set below baseline emissions. Therefore, GHG emissions in the city need to be reduced below existing levels while additional emissions are generated by growth through 2035. As such, new development can contribute its fair share of GHG reductions by complying with CAP strategies and measures that are determined to be applicable through the CAP Consistency Checklist development process. The following sections provide additional information about the steps for new development projects to demonstrate consistency with the CAP.

II. CEQA Streamlining Provisions of the Climate Action Plan

This memorandum describes a GHG screening threshold and associated size-based criteria to determine if a project would be subject to the provisions of the CAP. Projects that are consistent with the General Plan land use designation and exceed the GHG screening threshold are required to show consistency with the CAP through the CAP Consistency Checklist. No additional screening or GHG studies are required, except in cases involving land use designation changes or when other unique circumstances warrant it (e.g. when a project does not fit within the parameters of the size-based screening criteria), as determined by the Director of Community Development, and confirmed by the decision-making authority, through the CEQA process.

In most cases, compliance with the CAP Consistency Checklist would provide the CEQA streamlining path to allow project-specific environmental documents, if eligible, to tier from and/or incorporate by reference the CAP's programmatic review of GHG impacts. That is, projects that are consistent with the General Plan and implement CAP GHG reduction measures may incorporate by reference the CAP's cumulative GHG analysis. The City's CAP meets the requirements under Section 15183.5 of the CEQA Guidelines as a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to development projects. The CAP Consistency Checklist provides a streamlined review process for the GHG emissions analysis of proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA.

III. Screening Threshold Development Methodology

This section describes the methodology used to develop the screening threshold based on CAP data, historical projects processed by the City, and anticipated growth projections. The steps used to develop the screening threshold are outlined below.

- 1) Historical GHG emissions were estimated from projects approved in the city from the past three years. Project data obtained included project name, land use or project type (e.g., residential, commercial), project size metrics (e.g., dwelling units, square feet, acres), and annual unmitigated GHG emissions (if available from the project environmental document).
- 2) For the proposed projects that did not estimate associated GHG emissions, annual operational GHG emissions were estimated using the California Emissions Estimator Model (CalEEMod) based on the land use or project type for each project.
- 3) The total GHG emissions reductions from measures in the CAP applicable to new developments were determined based on the GHG reduction potential for each applicable measure in 2035. These emissions were annualized to determine the needed annual GHG reduction from new development in the city to meet the 2035 GHG reduction target identified in the CAP.
- 4) Based on the GHG reduction potential of measures included in the CAP applicable to new developments, the proportional amount of annual emissions reductions attributable to new projects (i.e. development that occurs between the CAP's baseline year of 2012 and forecast year of 2035) to meet the City's 2035 reduction target was determined.
- 5) The proportional reduction in emissions attributable to new development to meet the City's 2035 reduction target was determined by dividing the total reduction attributable to new development to the difference between the 2035 BAU emission forecast and the 2035 target emissions level.
- 6) The proportional reduction in emissions from new forecasted development estimated in Step 5 was applied to unmitigated project emissions in the City's list obtained under Step 1. The application of the proportional reduction to each project was calculated based on the anticipated GHG reductions from new forecasted development projects in the city.
- 7) The average anticipated CAP measure reductions from new development obtained in Step 3 was compared to the anticipated reductions from forecasted development. This step provided a comparison between the anticipated reductions from applying applicable CAP measures to all new developments, and the level of annual reductions needed to achieve the City's 2035 target.

- 8) A MTCO_{2e} screening level was set to remove the application of CAP measure reductions to projects below the screening level.
- 9) The screening level was adjusted in an iterative manner to achieve an appropriate emissions capture rate and align with anticipated annual reductions from the CAP needed to meet the City's 2035 target. The goal of this exercise was to achieve a maximum emissions capture rate under the screening level based on estimated amortized reductions from recent and forecasted development projects.

Based on the above methodology, the mass emissions level that achieves the goals outlined in Step 9 is **500 MTCO_{2e} per year**. This level would capture 86 percent of emissions from new projects and would achieve adequate reductions from captured emissions to meet the CAP's goals for new development. In other words, 86 percent of emissions from new projects would be subject to CAP reduction measures through the CAP Consistency Checklist and would achieve reductions consistent with the analysis in the CAP through application of these measures. Projects that fall below this level would be considered less than significant and would not interfere with the City's ability to meet its CAP targets.

IV. Demonstrating Consistency with the Climate Action Plan

The level at which analysis is required to determine a project's CAP consistency is primarily dependent on the proposed project land use(s). Projects that propose a land use consistent with the existing General Plan land use designation could demonstrate CAP consistency by completing the CAP Consistency Checklist and including applicable GHG reduction measures in project development and designs. New General Plan consistent projects that propose development that would generate emissions greater than the City's screening level threshold would be required to demonstrate CAP consistency as part of the project's development review process. New General Plan consistent projects that propose development that would generate fewer emissions than the City's screening level would be determined to be consistent with the CAP and require no further analysis. Projects not consistent with the existing General Plan land use designation that would result in a less GHG intensive project compared to existing designations can proceed to the next step of the CAP Consistency Checklist.

The process to determine the required level of analysis is shown in Figure 1. The levels of analysis indicated below and discussed in detail in this report include: No Additional Analysis; CAP Consistency Checklist; CAP Consistency and Quantitative Comparison; and CAP Consistency Checklist and Project-Specific Analysis.

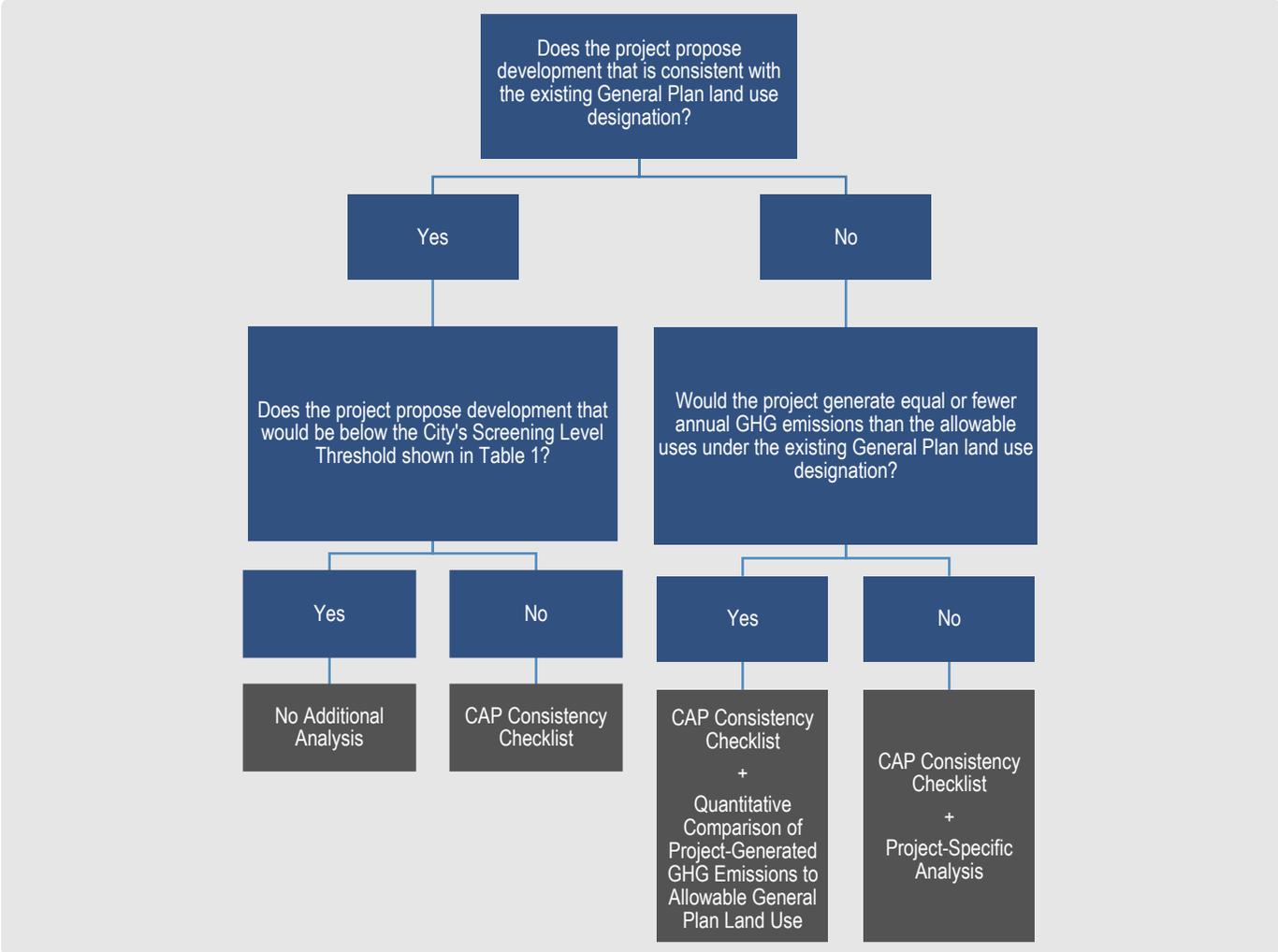


Figure 1 Required Level of Analysis Flowchart

Land Use Consistency

Measures to reduce GHG emissions for projects with land uses consistent with the GPU are found in the CAP. Therefore, the first step in determining a project’s consistency with the CAP is to measure the density and intensity of the project. If a project is consistent with the growth projections in the CAP, its associated growth in terms of GHG emissions was accounted for in the CAP’s BAU projection and is within the scope of the CAP’s analysis and program of measures that contribute towards reducing overall communitywide GHG emissions below identified GHG targets. Projects that are consistent with the existing General Plan land use designation may incorporate by reference the CAP’s cumulative GHG analysis.

If a project is determined to be accounted for in the CAP’s BAU projections, the next step is to compare the project size to the screening level thresholds identified in Table 1 in the following section.

Projects that are exempt from CEQA are deemed to be consistent with the City’s CAP, and no further review is necessary, with the exception of a Class 32 “In-Fill Development Projects” categorical exemption (State CEQA Guidelines Section 15332), for which projects are required to demonstrate consistency with the CAP through the CAP Consistency Checklist. Additional projects may be exempt

from these requirements including Affordable Housing projects consistent with California Code of Regulations Section 15194, "Affordable Housing Exemption." Projects that may be subject to a CEQA exemption or the requirements of demonstrating CAP consistency should consult with City staff to determine the level of review necessary.

It is important to note that not all projects that are proposing development that is not consistent with existing General Plan land use designations would be inconsistent with the CAP's projections. For example, if a project includes a General Plan Land Use Element Map 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. In addition to providing evidence to support the conclusion that the project would generate fewer emissions than existing designations, these projects would demonstrate consistency with the CAP through completion of Step 2 of the CAP Consistency Checklist.

Projects that are not consistent with the General Plan land use designation and would result in a more GHG-intensive project are required to prepare a project-specific, quantitative GHG analysis based on State CEQA guidelines. This project-specific analysis would be a supplementary analysis in addition to the completion of the CAP Consistency Checklist.

Project Screening Threshold

For projects that are consistent with the General Plan land use designation, the next step is to compare the project size to the screening threshold. A GHG screening threshold of **500 MTCO_{2e}/year** is established for new development projects in order to determine if a project would need to demonstrate consistency with the CAP through the CAP Consistency Checklist. Projects that are determined to be consistent with the General Plan and CAP projections, and projected to emit fewer than 500 MTCO_{2e} annually would not make a considerable contribution to the cumulative impact of climate change and would not need to provide additional analysis to demonstrate consistency with the CAP.

Table 1 lists types and sizes of projects that correspond to the 500 MTCO_{2e} GHG screening threshold. For project types not listed in this table, the need for GHG analysis and mitigation will be made on a project-specific basis, considering the 500 MTCO_{2e} per year screening threshold. Projects that are projected to emit more than 500 MTCO_{2e} of GHGs annually would need to comply with applicable CAP strategies and measures. Compliance will be evaluated through completion of the CAP Consistency Checklist.

Table 1 Size-Based Project Screening Threshold		
Project/Plan Type ¹	Screening Threshold ²	SFE Factor
Single-Family Housing ³	36 dwelling units	1.0
Multi-Family Housing	55 dwelling units	0.7
Office	43 ksf	0.8
Commercial Space	20 ksf	1.8
Regional Shopping Center	18 ksf	2.0
Restaurant	6.5 ksf	5.5
General Light Industrial	58 ksf	0.6
Warehouse (Unrefrigerated)	233 ksf	0.2
Warehouse (Refrigerated)	62 ksf	0.6
Mixed-Use	See Footnote 4	--

Notes: CAP = Climate Action Plan; ksf = thousand square feet; MTCO_{2e} = metric tons of carbon dioxide equivalent; SFE = single-family equivalency

- ¹ For project types not listed in this table, the need for GHG analysis and mitigation will be made on a project-specific basis, considering the 500 MTCO_{2e} per year screening level.
- ² The screening threshold represents the maximum project size at which a project is estimated to emit less than 500 MTCO_{2e} per year without the application of additional mitigation measures. Projects proposing greater unit or square footage amounts than the above screening thresholds would be required to complete the CAP Consistency Checklist.
- ³ Single-Family Housing developments are defined as single-family detached homes on individual lots. All other residential types (e.g. single-family attached, condo/townhouse, apartment) should be considered “Multi-Family Housing” for the purposes of comparing a project to the screening thresholds.
- ⁴ Mixed-Use projects can provide a comparison to the screening thresholds using a single-family equivalency (SFE) factor. All projects that demonstrate they propose development equal to or less than 36 SFE units would be considered below the screening threshold. For example, a mixed-use development proposing 20 multi-family dwelling units and 10 ksf of commercial space would have an SFE value of 32 [equation: (20 x 0.7) + (10 x 1.8) = 32], and would be below the screening threshold.

Source: Analysis conducted by Ascent Environmental in 2020

Additionally, the City is in the process of developing screening thresholds for vehicle miles traveled (VMT) consistent with State legislation. In some cases, projects below the 500 MTCO_{2e} threshold may also be deemed to have a less than significant impact related to VMT through evaluation by the City on a case-by-case basis. Thus, projects that would be below both the GHG and VMT screening level thresholds would not be anticipated to result in cumulative GHG impacts and conflict with the City’s ability to achieve its GHG reduction targets. This could also apply to projects that propose development that is not consistent with the City’s General Plan, but would not increase GHG emissions to a level greater than the allowable General Plan land use buildout of the site(s). However, a project level GHG analysis would be required to substantiate this determination.

It should be noted that the 500 MTCO_{2e} level must be strictly applied as a screening threshold and is not intended to be a threshold of significance. In other words, projects that exceed this emissions level may not propose mitigation measures to reduce emissions below 500 MTCO_{2e}. Projects that exceed the screening level would be required to complete the next step of the CAP Consistency Checklist as described below.

For proposed projects at or above the screening threshold of 500 MTCO_{2e}, applicants are required to complete the CAP Consistency Checklist, which provides a streamlined review process for proposed new development projects that are subject to discretionary review and require environmental review pursuant to CEQA. A properly completed CAP Consistency Checklist documents how a proposed project complies with the CAP, and in so doing, demonstrates that the project's contribution to climate change impacts is not cumulatively considerable. A project requiring a land use designation change that is more GHG-intensive than the land use assumed under the CAP must prepare a project-specific GHG analysis in accordance with the applicable CEQA Guidelines.

CAP Consistency Checklist

The CAP identifies specific performance metrics supporting each GHG reduction measure. Actions to implement the measures include a combination of ordinances, programs, incentives, outreach, and educational activities. As CAP implementation occurs, each action will be assessed and monitored.

As described in the CAP, there is an existing framework of federal, State, regional, and local policies and regulations that contribute to reducing GHG emissions. The CAP shows that reductions from existing regulations, in combination with additional General Plan policies and actions, would not be adequate to meet established targets. Local actions that reduce emissions from both existing and new development would be necessary. The CAP includes targets that relate to a relative reduction in GHG emissions below baseline levels. While the City will achieve reductions outlined in the CAP through capital programming, incentives, awareness and education, and planning processes and ordinances, new development can do its fair share in helping the City achieve its targets by incorporating measures consistent with the CAP. This also provides new development with the benefit of using CEQA streamlining provisions for addressing its GHG impacts.

The CAP Consistency Checklist is used to implement GHG reduction measures from the CAP that apply to new development projects. All projects subject to discretionary review and requiring environmental analysis are required to complete the CAP Consistency Checklist. The CAP Consistency Checklist, available at [\[INSERT LINK TO CHECKLIST\]](#), includes specific measures identified in the CAP and indicates which types of new developments (e.g. residential, commercial) each measure would apply. Projects that propose a use for which a measure is applicable would be required to demonstrate that the requirements of the measures would be implemented on-site or during the development process in order to be consistent with the CAP.

Projects that are not consistent with the existing General Plan land use designation are still required to complete the CAP Consistency Checklist. Any alternative method of analysis provided for these projects would be supplemental to the projects' consistency with any applicable CAP measures.

The CAP Consistency Checklist will be updated by the City as needed to incorporate new GHG reduction techniques or to comply with later amendments to the CAP, local ordinances, or State and federal laws.

Alternative Method to Demonstrate Consistency

Projects that propose development that is not consistent with the City's General Plan land use designation(s), and that intensify GHG emissions beyond current designations are required to provide additional analysis beyond the CAP Consistency Checklist. This analysis must be prepared based on State CEQA Guidelines and identify substantiated thresholds of significance to determine project

impacts. However, projects that are consistent with the General Plan but have unique land uses or circumstances for which no measures in the Checklist would apply can demonstrate consistency with the CAP through comparison to a numerical GHG threshold.

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 must be supported with substantial evidence showing impacts have been reduced as described in the two analysis options. With the implementation of CAP strategies and measures, the City expects most General Plan-consistent projects will achieve CAP consistency through the CAP Consistency Checklist alone. The additional analysis option is to be used only when unique circumstances warrant it, as determined by the Director of Community Development through the CEQA process. In such cases, an applicant would need to provide a project-specific quantitative GHG analysis demonstrating consistency with the method described below. Project applicants would still need to complete the entire Checklist (i.e., Steps 1 and 2) and comply with all other applicable CAP measures to the extent feasible.

Numerical Greenhouse Gas Threshold

Projects that are consistent with the City's General Plan may apply the City's recommended numerical GHG threshold of **2.0 MTCO₂e per service population per year**. Service population is defined as the sum of number of residents and jobs anticipated to be generated by the project. This threshold was established based on the CAP GHG reduction target in 2035 and demographics projections (i.e., population and employment) for the same year.

The numerical GHG threshold approach requires applicants to quantify their GHG emissions in 2035, consistent with the CAP horizon year, and estimate reductions from the Checklist measure(s), in addition to supplemental mitigation measures necessary to achieve the numerical GHG threshold. The type, character, and level of mitigation would depend on the project type, size, location, context, and other factors. The availability of mitigation measures can change over time as well, with new technologies, building materials, building design practices, and other changes. Therefore, in developing project-specific reduction measures, the City recommends that a project applicant refer to current guidance from the California Air Pollution Control Officers Association ("CAPCOA"), CARB, the Governor's Office of Planning and Research ("OPR"), the California Attorney General, and the San Diego Association of Governments ("SANDAG") to determine applicable mitigation measures and estimate their effectiveness.