Citrus Heights Greenhouse Gas Reduction Plan Implementation Procedure for New Development

INTRODUCTION

Citrus Heights acknowledges that climate change is an important global challenge for the City, the region and the State. The City accepts that it has a fair share of responsibility to achieve the greenhouse gas (GHG) reduction goals of the State.

In 2011, the City of Citrus Heights adopted an updated General Plan, including Goal 55:

> *Reduce community-wide GHG emissions 10-15% below 2005 levels by 2020.*

The General Plan also includes Policy 55.1:

> *Implement a compressive greenhouse gas reduction plan to reduce communitywide greenhouse gas emissions through community engagement and leadership; land use, community design, and transportation choices; energy and water conservation techniques; solid waste reduction and building green infrastructure.*

Concurrent with the General Plan Update, the City adopted a Greenhouse Gas Reduction Plan (GGRP) to provide the framework to achieve Goal 55 and implement Policy 55.1. The GGRP includes over 100 measures and actions that work together to help the City reach this goal by 2020.

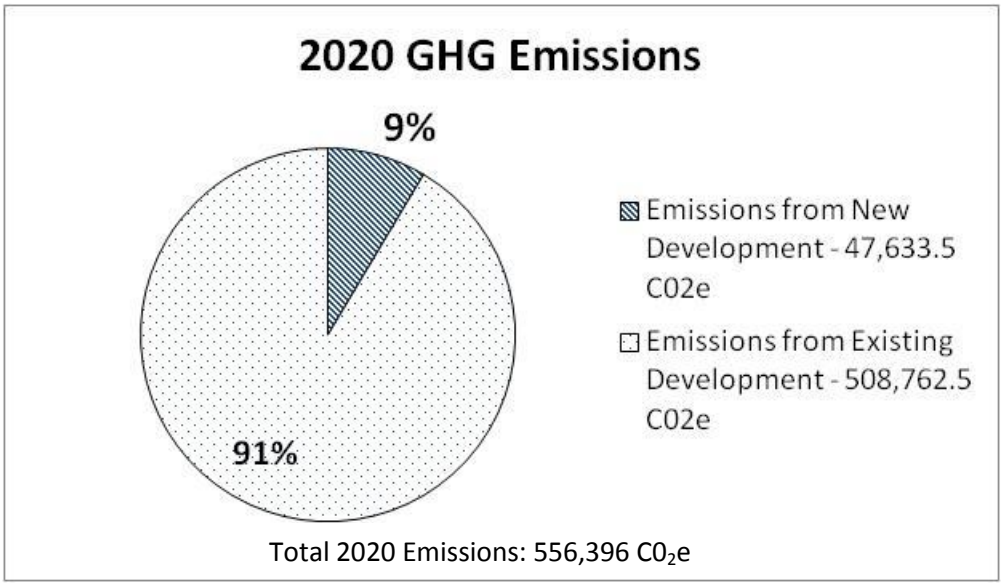
BACKGROUND

The City's General Plan plays a pivotal role in guiding new development that occurs in Citrus Heights. Because the City is 98% built out, the majority of GHG reduction efforts are focused on improvements within the existing built environment. Rather than implement mandatory measures, the GGRP favors an incentives-based approach to GHG reductions.

The City's GHG inventory identified a community-wide emissions total of 543,727 metric tons of carbon dioxide equivalent (CO_2e) for the 2005 baseline year. Under a business as usual (BAU) approach, the General Plan anticipates an annual community-wide emissions total of 556,396 MT CO_2e in 2020. Because the City has adopted a GGRP anticipated to reduce emissions by 87,267 MT CO_2e annually, the result will be total emissions of 469,129 MT CO_2e by 2020, reflecting a 13.7% reduction. Together with the effects of state-wide efforts such as the Low Carbon Fuel Standard (LCFS), Renewable Energy Portfolio Standard (RPS), and AB 1493 and the City's GGRP, the City expects to achieve a combined reduction of 145,677 MT $C0_2e$ annually by 2020 resulting in total projected 2020 emissions of 410,719 MT CO_2e (or about 24.5% below 2005 levels).

Although the City is 98% built out, the City's General Plan includes development opportunities for up to 3,577 new dwelling units and up to 2.9-million square feet of new non-residential development. The City anticipates 95,267 MT $C0_2e$ will be produced annually through the General Plan horizon year of 2035 associated with new development. It is possible to apportion the total 95,267 MT $C0_2e$ into an average

annual emissions rate for the 30 years between 2005 and 2035 to estimate the total emissions associated with new development by 2020 (95,267 / 30 = 3,175.6 MT $C0_2e$ annually). This results in 47,633.5 MT $C0_2e$ by 2020 (3,175.6 x 15 years = 47,633.5 MT $C0_2e$) associated with new development.



Total 2020 Emissions: 556,396 $C0_2e$

The GGRP and General Plan EIR considered the incremental increase in GHG associated with new development anticipated under the General Plan. The GGRP includes measures that are applicable to both new and existing development that will lead to a cumulative reduction of GHG's by 13.7% below 2005 levels by 2020.

RELATIONSHIP TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

The State has adopted numerous amendments to the California Environmental Quality Act (CEQA) Guidelines to address the potential for environmental impacts associated with GHG emissions. The City's General Plan and certified General Plan EIR and the GGRP are fully consistent with the applicable Guidelines provisions, as described further below.

The discussion below addresses the following topics: 1) CEQA compliance for adoption of the GGRP; 2) reliance on the GGRP for analysis and mitigation of cumulative GHG emissions from future projects; 3) adoption of new CEQA thresholds of significance for future projects; 4) procedures for demonstrating project-level CEQA compliance; and 5) project Level GHG Analysis for Projects inconsistent with General Plan and/or GGRP.

1. CEQA COMPLIANCE FOR ADOPTION OF THE GGRP

CEQA requires the City to identify the significant environmental impacts of its discretionary actions and to avoid or mitigate those impacts, where feasible. GHG emissions are a complex, global, cumulative environmental issue that requires analysis under CEQA (CEQA Guidelines Section 15064.4 and Appendix G Checklist, part VII).

Adoption of the GGRP was a discretionary action subject to CEQA review. Adoption of the GGRP implements Policy 55.1 of the Citrus Heights General Plan, which was analyzed in the certified General Plan EIR.

Pursuant to Section 15162 of the CEQA Guidelines, when an EIR has been certified for a project, no subsequent EIR is required unless:

A. Revisions to the EIR are necessary to address new or substantially more severe significant impacts that result from changes in the project or changes in the circumstances under which the project is undertaken
B. New information of substantial importance identifies new or substantially more severe significant effects, or identifies new or better mitigation measures or project alternatives that the City would otherwise decline to adopt.

The GGRP was prepared concurrently with the General Plan and, therefore, included evaluation of potential environmental impacts in the General Plan EIR. Despite incremental growth from new development, the GGRP results in a cumulative reduction of GHG emissions in Citrus Heights of 10-15% below 2005 levels by 2020 (24.5% including state-wide measures). The EIR for the General Plan concludes that impacts associated with climate change are less than significant.

The certified General Plan EIR provides CEQA compliance for adoption and implementation of the GGRP.

2. RELIANCE ON THE GGRP FOR ANALYSIS AND MITIGATION OF CUMULATIVE GHG EMISSIONS

The GGRP has been developed, among other reasons, specifically to satisfy the requirements of Section 15183.5(b) of the CEQA Guidelines. The City specifically adopted the General Plan, GGRP, and General Plan EIR to enable CEQA tiering for projects that are consistent with the General Plan and GGRP. The GGRP and the General Plan EIR include all of the recommended elements identified in this section including:

- Quantification of existing and projected GHG emissions for City through 2020
- Identification of a 2020 mandatory GHG emissions target that is consistent with AB 32 and will achieve emissions levels below existing conditions (10-15% reduction below 2005 levels by 2020)
- Identification and analysis of GHG emissions associated with implementation of the General Plan based on calculation of the emissions resulting from types of projects that could develop based on the adopted Land Use diagram.
- Provision of substantial evidence in the form of substantiated analysis using best practices that demonstrates that implementation of specific measures (including performance standards) on a project by project basis will collectively achieve the adopted emission target.
- Inclusion of a monitoring program to track progress towards achieving the GHG emission target. Amendment of the plan is required if the GHG emissions target is not achieved.

A cumulative impact of concern under CEQA occurs when the net result of combined individual impacts compounds or increases other overall environmental impacts (CEQA Guidelines Section 15355). Because 2020 emissions levels adopted by the City are below existing emissions levels, by definition the adoption of the GGRP would not contribute to or result in an adverse change in the environment; therefore, achievement of the City's reduced levels of emissions would not be cumulatively considerable.

As described for determining significance under Section 15064.4 and allowed for cumulative impact analysis under Section 15130 of the CEQA Guidelines, project level contributions to cumulative effects will be considered less than cumulatively considerable if the project is consistent with the General Plan and GGRP, because these plans will reduce GHG emissions overall.

Therefore, consistency with the General Plan and GGRP, including compliance with the applicable reduction measures, indicates that a later project is implementing its fair share of measures required to achieve the GHG target and thus fully mitigates GHG emissions impacts.

3. THRESHOLDS OF SIGNIFICANCE

Adoption of this GGRP includes a 2020 emissions target of 10-15% below 2005 levels, thus ensuring no net increase in emissions over time.

Based on the GGRP, the following thresholds shall be used for determining the significance of GHG emissions and climate change impacts associated with future projects:

A. Impacts associated with GHG emissions from projects that are consistent with the General Plan and otherwise exempt from CEQA are determined to be less than significant and further CEQA analysis for this area of impact is not required.

B. Impacts associated with GHG emissions from projects that are consistent with the General Plan, fall within the assumptions of the General Plan EIR, consistent with the GGRP, and not exempt from CEQA are determined to be less than significant or mitigated to a less-than-significant level, and further CEQA analysis for this area of impact is generally not required.

   To be determined consistent with the GGRP, a project must demonstrate that it is included in the growth projections in the General Plan and EIR upon which the greenhouse gas modeling is based, and that it incorporates applicable strategies and measures from the GGRP (or equally effective measures - as determined by the City) as binding and enforceable components of the project.

C. Impacts associated with GHG emissions from projects that are not consistent with the General Plan, do not fall within the assumptions of the General Plan EIR, and/or are not consistent with the GGRP, and are subject to CEQA review are presumed to be significant and further CEQA analysis is required.

4. PROCEDURES FOR DEMONSTRATING PROJECT- LEVEL CEQA COMPLIANCE

In order to demonstrate project-level compliance with CEQA relevant to GHG emissions and climate change impacts, applications for discretionary projects must include information that addresses the following:

A. Demonstrate consistency with the General Plan land use designation and applicable policies.
B. Demonstrate consistency with the GGRP including incorporation of applicable measures identified in the GGRP Checklist for New Development (or approved equivalent) as binding and enforceable components of the project (See Appendix A).

5. PROJECT LEVEL GHG ANALYSIS FOR PROJECTS INCONSISTENT WITH GENERAL PLAN AND/OR GGRP

If a project is not consistent with the General Plan, does not fall within the assumptions of the General Plan EIR, and/or is not consistent with the GGRP, the applicant must conduct a project specific GHG analysis. The applicant must demonstrate to the City's satisfaction how the project will achieve its fair share of the established targets including:

A. Use of alternative design components and/or operational protocols to achieve the required GHG reductions;
B. Use of real, additional, permanent, verifiable and enforceable offsets to achieve required GHG reductions. To the greatest feasible extent, offsets shall be locally based, project relevant, and consistent with other long term goals of the City;
C. The project must also be able to demonstrate that it would not substantially interfere with implementation of GGRP measures or actions.

Appendix A

Checklist for New Development for Consistency with GGRP

☑	*Measure*	*GGRP #*	*Applicable (Y/N?)*	*Comment*
	Participate in the BERC Sustainable Business Program	*1.1.A.A*		
	Provide bike/Pedestrian Connections between land uses	*2.1.C.A*		
	Provide preferential parking spaces for carpool or vanpool use	*3.2.A.B*		
	Minimize Parking lot area by providing shared parking, motorcycle parking, or rideshare parking	*3.3.A.C*		
	Provide parking and charging infrastructure for alternative fuel vehicles	*3.4.A.A*		
	Install improvements identified in the Bicycle Master Plan	*3.5.A.A*		
	Install bicycle parking facilities	*3.5.B.A*		
	Provide Transit Stop improvements including shade, route information, lighting, etc. (if applicable)	*3.6.A.B*		
	Provide and implement a Construction Air Quality Mitigation Plan (if NOX exceeds 85lbs/day)	*4.1.A.A*		
	Utilize recycled materials in construction	*4.1.C.A*		
	Install Solar Hot Water Heaters	*4.2.B.A and 4.2.B.B*		
	Sub-meter all tenant spaces	*4.3.C.A*		
	Utilize Energy Star Appliances	*4.3.D.A*		
	Reduce Turf installation	*5.1.B.E*		
	Maximize site improvements that promote infiltration, reuse, and evapotranspiration of rainfall from impervious areas	*5.2.C.A*		
	Minimize impervious surfaces	*5.2.C.C*		
	Recycle or re-use all construction materials/debris	*6.2.A.A*		
	Install Shade Trees consistent with Zoning Code	*7.1.A.C*		