

September 30, 2014

.....
 Approach to Climate Action Plan CEQA Streamlining

Summary

Attached is the Sunnyvale Climate Action Plan (CAP) Checklist to facilitate project-level streamlining from the Sunnyvale's adopted CAP. The intent of the checklist is to provide a consistent approach for streamlining the analysis of greenhouse gas emissions under the California Environmental Quality Act (CEQA). The Checklist allows City staff to determine: 1) project consistency with CAP forecasts, and 2) the project's incorporation of applicable strategies and measures from the CAP as binding and enforceable components of the project.

In summary, the checklist provides criteria to determine consistency with the CAP. Projects that are ineligible for CAP streamlining would be required to analyze project-level GHG emissions, consistent with the City's current practice by submitting a consultant-prepared GHG impact analysis. Minimum recommended content that should be included in environmental analysis is outlined.

The checklist includes the following sections:

- **Consistency with CAP Forecasts:** Identifies that non-stationary source projects consistent with the General Plan and Zoning Code are consistent with CAP forecasts. This section provides additional criteria for projects triggering a General Plan amendment or rezone. Large, stationary source emitters regulated by the Bay Area Air Quality Management District were not included in the CAP forecast and excluded from the streamlining process.
- **Mandatory CAP Standards:** Identifies the minimum mandatory standards applicable to residential and nonresidential development for streamlining. For now the Near-Term measures and action items from the Sunnyvale CAP have been included.
- **Recommended Environmental Analysis Content:** Brief list of recommended content for environmental analysis, when necessary, that allows a project means to reduce its GHG emissions while allowing an applicant to choose which items to use to obtain compliance with the GHG reduction goals of the CAP.

The draft Sunnyvale CEQA Initial Study Supplemental Checklist for Private Development is presented as Attachment 1.

City of Sunnyvale**Attachment 1: Climate Action Plan CEQA Checklist****Summary**

This checklist identifies the minimum criteria a project must demonstrate to use the City's CAP for purposes of streamlining the analysis of greenhouse gas emissions under CEQA. Minimum criteria outlined below includes: 1) consistency with CAP forecasts, and 2) incorporation of applicable Near-Term (prior to 2016) strategies and measures from the CAP as binding and enforceable components of the project.

Section 1: Consistency with CAP Forecasts

The CAP's achievement of the 15% reduction below 2008 target is based on growth assumptions in the City's General Plan and regional growth forecasts. For eligibility to streamline from the CAP for purposes of an environmental analysis, projects must demonstrate consistency with CAP forecast assumptions using the criteria listed below. As appropriate, these criteria should be cited as evidence in any subsequent environmental document.

1A. Does the project include large stationary emissions sources that would be regulated by the Air District?☐ Yes☐ No

*If **no**, then the project may be eligible to claim consistency with growth assumptions that were used for CAP modeling. Skip to question **1C** to determine consistency with CAP forecasts.*

*If **yes**, the project may trigger additional changes to the physical environment that were not considered in the CAP and would otherwise be regulated by the Bay Area Air Quality Management District. Complete **1B**.*

1B. If this project is a stationary source emitter as outlined under 1A, does it also include any of the following emissions sources?

Residential uses	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Commercial uses	<input type="checkbox"/> Yes	<input type="checkbox"/> No

*If **no**, the project does not include any emissions sources that were assumed in CAP growth forecasts. Therefore, the project may trigger additional changes to the physical environment that were not considered in the CAP. CAP measures may be used to mitigate GHG emissions, but project-level analysis of GHG emissions using the California Emissions Estimator Model (CALEEMod) or another method must be prepared by a qualified air quality consultant.*

*If **yes**, the project may include emissions sources mitigated by the CAP. Therefore, any sources identified in 1B may be eligible to claim consistency with the CAP. All stationary sources regulated by the Bay Area Air Quality Management District shall be analyzed separately. Other sources that were analyzed in the CAP may still qualify for streamlining, should the project demonstrate consistency with the CAP as outlined in **1C** and following sections below.*

1C. Does the project trigger an amendment to or adoption of any of the following planning documents?

General Plan	<input type="checkbox"/> Yes	<input type="checkbox"/> No
--------------	------------------------------	-----------------------------

City of Sunnyvale

Attachment 1: Climate Action Plan CEQA Checklist

Specific Plan	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Precise Plan for El Camino Real	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Please describe any amendments or adoption of new specific plans or special planning areas, as applicable:

*If **no**, then the project is eligible to claim consistency with growth assumptions that were used for CAP forecasts.*

*If **yes**, the project would trigger an amendment to or adoption of one or more of the documents list above, complete **1D** below.*

1D. If the project triggers an amendment to the General Plan, specific plans, and/or special planning areas, complete the following table:

	Existing & Proposed Project			Proposed Project's Net Effect on Citywide Forecasts		
	Existing or Allowed Under Existing Zoning (A)	Proposed Project (B)	Net Change from Existing Zoning (C=B-A)	2020 CAP Forecast (D)	Proposed Project's Net Effect on Citywide 2020 Forecast (E = D+C)	Would Net Effect of Project Exceed the Citywide 2020 CAP Forecast?
Population				145,020		
Jobs				89,750		
Households / Dwelling Units				59,660		

Please describe any assumptions used to calculate existing, allowed, or proposed conditions:

City of Sunnyvale

Attachment 1: Climate Action Plan CEQA Checklist

*If **no for all indicators above**, then the project may be eligible to claim consistency with CAP growth assumptions. The project's assumed residents, employees, and households would not create a net increase on community-wide growth assumed in the CAP. The CAP uses these community-wide growth indicators to forecast community-wide emissions from residential energy use, nonresidential energy use, water-related emissions, and waste. Because the CAP uses these comparable indicators to forecast non-transportation related emissions, and the project would not exceed the CAP's assumed 2020 residents, employees, and dwelling units, the project's non-transportation emissions are therefore consistent with CAP growth assumptions and captured within the CAP's emissions forecast. Complete **1E** below.*

*If **yes to one or more indicators above**, the proposed project's net effect on citywide 2020 forecasts would exceed the 2020 CAP forecast assumptions. Therefore, the project may trigger additional emissions not assumed in CAP growth forecasts.*

Any projects that exceed the 2020 forecasts may still rely on the CAP for identification of measures and standards for mitigation. However, since such projects exceed the assumptions of the CAP forecast, it is recommended that the project demonstrate anticipated project-level GHG emissions estimates using CALEEMod or another tool. (estimates prepared by consultant).

1E. If the project is consistent with CAP growth forecasts as identified in 1D above, provide the following information.

Would the project have a potentially significant impact after mitigation on any of the following standards of significance identified in the State CEQA Guidelines, Appendix G?

a) Conflict with an applicable plan, program, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
c) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

*If **yes to one or more standards above**, the proposed project's net effect on citywide 2020 forecasts is inconsistent with plans, programs, or policies that informed the assumptions for the 2020 transportation forecast. Therefore, the project is inconsistent with transportation emissions forecasts and is not eligible to claim consistency with the CAP for purposes of GHG emissions and impacts on climate change.*

*If **no for all standards above**, then the project is consistent with the plans, programs, policies, or ordinances that informed the travel demand model for the 2020 transportation forecast of the CAP. Therefore, the project is consistent with CAP growth assumptions for transportation emissions in the CAP and is eligible to claim consistency with CAP transportation forecasts.*

City of Sunnyvale

Attachment 1: Climate Action Plan CEQA Checklist

Section 2: Consistency with CAP Measures

The CAP provides measures that achieve a 15% reduction below 2008 emissions levels by 2020. Each of the measures contains a bulleted list of action items/project standards that help projects achieve that goal. Projects that wish to demonstrate consistency with the CAP must demonstrate consistency with all applicable measures and action items/project standards from the CAP. Consistency with all applicable measures should be cited as evidence to support tiering from the CAP.

2A. Using the action items/project standards identified on the following pages, identify all measures and action items/project standards that are applicable to the project. Identify applicability and project compliance with each action item/project standard.

If a project demonstrates all applicable mandatory standards, the project is eligible to claim consistency with CAP measures and is eligible for CAP streamlining.

If a project does not integrate all applicable mandatory standards, the project is ineligible to claim consistency with CAP measures and is not eligible for CAP streamlining.

Additional voluntary measures may also be recommended. Projects inconsistent with growth forecasts should consider integrating all feasible voluntary and mandatory CAP measures.

Standards for Climate Action Plan Consistency/Private Development

(Includes Near-Term Action Items and Action Items Already Implemented by the City)

Applicable? (Yes or No)	Measure	Action Item/Project Standard	Describe whether standards are applicable and how the project demonstrates consistency with applicable standards
	OS-2	Provide availability and access to outdoor space for recreation or social purposes, including access to public open spaces on privately owned property such as retail shopping centers	
	OS-3.1	Continue to implement the City's Tree Preservation requirements.	
	EC-2.2	Continue to require energy-efficient siting of buildings. Buildings should be oriented and landscape material should be selected to provide maximum energy efficiency for the buildings	
	WC-2.3	Require new open space and street trees to be drought-tolerant	

City of Sunnyvale

Attachment 1: Climate Action Plan CEQA Checklist

	LW-2.1	Require multi-family homes to participate in the City's Multi-family Recycling Program	
	LW-2.2	Select materials to be targeted for diversion methods, services or technologies based on the results of the Zero Waste Strategic Plan	
	CA-1.7	Actively promote the use of alternative modes of transportation as safe modes of travel. When applicable, promote viable programs sponsored by 511.org, the BAAQMD and other recognized agencies on the City's website and publications	
	CTO-1.1	Incorporate the provisions of AB 1358, the California Complete Streets Act of 2008, into roadway design, construction and maintenance activities	
	CTO-1.2	Implement the street space allocation policy (RTC 8-085, April 28, 2009) in coordination with road reconstruction or resurfacing projects to provide road configurations that accommodate all travel modes.	
	CTO-1.3	Require new development to provide cross-parcel access and linkages from the development entrance to the public sidewalk system, transit stops, nearby employment and shopping centers, schools, parks and other parcels for ease of pedestrian and cyclist access	
	CTO-1.4	Improve pedestrian safety and comfort through design elements such as landscaped medians, pedestrian-level amenities, sidewalk improvements and compliance with ADA design standards, particularly for areas serving high volumes of traffic.	
	CTO-1.5	Improve bicycle facilities and perceptions of comfort through pavement marking/coloring, physical separation, specialized signs and markings and other design elements.	

City of Sunnyvale

Attachment 1: Climate Action Plan CEQA Checklist

	CTO-1.6	Require sidewalks to be a minimum of 6 feet wide in order to allow side-by-side walking at identified locations that currently serve high pedestrian traffic volumes or locations planned to serve high volumes of pedestrian traffic.	
	CTO-2.1	Require public areas and new development to provide bicycle parking consistent with the VTA Bicycle Technical Guidelines, as amended.	
	CTO-3.1	Continue sponsoring projects to provide transit rider amenities at bus stops and rail stations.	
	CTO-4.1	Require existing and future major employers to utilize a variety of transportation demand management measures such as flexible work schedules, telecommuting, guaranteed rides home, low or no cost transit passes, parking “cash-out” incentives and other programs that provide employees with alternatives to single-occupant commutes.	
	EP-2.3	Prevent buildings and additions from shading more than 10% of roofs of other structures.	
	EP-2.3	Continue to allow and encourage solar facilities above paved parking areas.	
	OR-1.3	In project review, encourage the replacement of high-maintenance landscapes (like grass turf) with native vegetation to reduce the need for gas-powered lawn and garden equipment.	
	OR-2.1	Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]) or less. Clear signage will be provided at all access points to remind construction workers of idling restrictions.	

City of Sunnyvale

Attachment 1: Climate Action Plan CEQA Checklist

	OR-2.2	Construction equipment must be maintained per manufacturer's specifications	
	OR-2.3	Planning and Building staff will work with project applicants from construction equipment by selecting one of the following measures, at a minimum, as appropriate to the construction project:	
		a. Substitute electrified or hybrid equipment for diesel and gasoline powered equipment where practical	
		b. Use alternatively fueled construction equipment on-site, where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.	
		c. Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.	
		d. Limit heavy-duty equipment idling time to a period of three minutes or less, exceeding CARB regulation minimum requirements of five minutes.	

City of Sunnyvale

Attachment 1: Climate Action Plan CEQA Checklist

Section 3: Minimum Recommended Content for Environmental Analysis

Projects demonstrating consistency with the CAP should use the following table as a guide for preparation of environmental analysis. As appropriate, information on the preceding pages should be used to support the analysis:

	Greenhouse gas analysis topic	Minimum recommended content
1	Existing Settings	General - GHG emissions and effects of global climate change
2	Existing Settings	State - statewide inventory and forecasts
3	Existing Settings	Local - Summary of CAP inventory and forecasts
4	Regulatory Framework	Federal - Brief overview of context
5	Regulatory Framework	State - CEQA Guidelines Section 15183.5 Tiering and Streamlining Analysis of GHGs - Summary of the streamlining provisions and whether they apply to the project, focusing on project components that aren't otherwise covered by streamlining
6	Regulatory Framework	State - regulations quantified and addressed in the CAP, including EO-S-3-05, AB 32, Climate Change Scoping Plan, Renewable Portfolios Standard (Senate Bill 1078, Governor's Order S-14-08, and California Renewable Portfolio Standards), Sustainable Communities Strategy, and California Building Energy Efficiency Standards
7	Regulatory Framework	Local – Bay Area Air Quality Management District
8	Regulatory Framework	Local - CAP, brief summary
9	Standards of Significance	CEQA Guidelines, Appendix G Standards
10	Standards of Significance	CEQA Guidelines Section 15183.5 Tiering and Streamlining Analysis of GHGs
11	Standards of Significance	CAP and supplemental EIR guidance
12	Impacts	Identify findings of CAP supplemental EIR
13	Impacts	Finding: Provide findings of significance, streamlining by focusing on findings of CAP supplemental EIR.

City of Sunnyvale

Attachment 1: Climate Action Plan CEQA Checklist

	Greenhouse gas analysis topic	Minimum recommended content
14	Impacts	<p>Projects that are consistent with CAP forecasts and measures should demonstrate the following:</p> <ul style="list-style-type: none"> -Consistency with assumptions of CAP forecast, using tables and information from this guide -Incorporation of all applicable CAP measures as mitigations or as part of the project description -CAP finding that all such measures, on a citywide basis, lead to a less than significant impact
15	Impacts	<p>Projects that are inconsistent with either CAP forecasts or CAP measures are not eligible for streamlining. While such projects may still incorporate elements identified above, they should also incorporate project-level GHG emissions modeling.</p>