



DEVELOPMENT SERVICES DEPARTMENT

CLIMATE ACTION PLAN CONSISTENCY REVIEW CHECKLIST FREQUENTLY ASKED QUESTIONS (FAQs)

The City of San Marcos (City) adopted an updated Climate Action Plan (CAP) in December 2020. The CAP identifies strategies and measures that the City will undertake to achieve its proportional share of State greenhouse gas (GHG) emissions reduction targets. In conjunction with the CAP, the City prepared a CAP Consistency Review Checklist (Checklist). The purposes of the Checklist are to (1) implement the CAP measures that apply to new discretionary development projects and (2) provide a streamlined environmental review process for development projects that are subject to discretionary review and/or trigger environmental review pursuant to the California Environmental Quality Act (CEQA).

The Development Services Department (DSD) has prepared answers to the following FAQs to clarify the circumstances in which Checklist completion is required and the procedures for completing it correctly.

1. DO I NEED TO COMPLETE THE CHECKLIST IF MY PROJECT IS EXEMPT FROM CEQA?

No. Completion of the Checklist is required only for discretionary projects subject to and not exempt from CEQA. Projects that are exempt from CEQA are deemed consistent with the City's CAP, and no further review is required. However, there is one exception: projects that qualify for the Class 32 categorical exemption for "In-fill Development Projects" (State CEQA Guidelines Section 15332) are required to demonstrate CAP consistency by completing the Checklist.

2. DO I NEED TO COMPLETE THE CHECKLIST IF MY PROJECT IS EXEMPT FROM CEQA UNDER THE CLASS 32 EXEMPTION FOR INFILL DEVELOPMENT PROJECTS?

Yes. Completing the Checklist to demonstrate CAP consistency is required for projects that qualify for the Class 32 categorical exemption for "In-fill Development Projects" (State CEQA Guidelines Section 15332). Also refer to Question 1.

3. I HAVE A "SMALL" PROJECT THAT REQUIRES AN IS/ND FOR CEQA. DO I STILL NEED TO COMPLETE THE CHECKLIST?

Maybe. To answer this question, review the list of project screening thresholds in Step 1 of the Checklist. For example, the screening threshold for a single-family housing project is 36 dwelling units; the screening threshold for a commercial project is 20,000 square feet. These project screening thresholds were identified because they would emit fewer than 500 metric tons of carbon dioxide equivalent (MTCO₂e) annually.



Projects below 500 MTCO₂e would not result in a considerable contribution to the cumulative impact of climate change. If your project does not exceed the applicable project size-based screening threshold(s), then your project's emissions are presumed to be less than 500 MTCO₂e, and the GHG impact is less than significant. Therefore, your project is not subject to the measures of CAP and no further preparation of the Checklist is required. If your project does exceed the applicable project screening threshold(s), then you must proceed with completion of Step 2 of the Checklist. Refer to Questions 4 and 5, respectively, if you have a mixed-use project or your project type is not included in Step 1.

4. I HAVE A MIXED-USE PROJECT. HOW DO I PERFORM PROJECT SCREENING IN STEP 1?

If you have a Mixed-Use project you can provide a comparison to applicable project screening threshold(s) in Step 1 using a single-family equivalent (SFE) method. The project screening threshold for single-family housing is 36 dwelling units. Under this method, mixed-use projects are converted into the equivalent number of single-family dwelling units and then compared to the project screening threshold for single-family housing. Mixed-Use projects that would result in development equivalent to 36 or less single-family dwelling units are considered below the screening threshold, and therefore not subject to the measures of the CAP and not required to further complete the Checklist.

To use this approach, first convert the land use components of your project into the equivalent number of single-family dwelling units using the provided SFE factors. Then compare your equivalent number of single-family dwelling units to the single-family project screening threshold of 36 dwelling units. SFE factors for different project types are provided in Table 1 of the *Guidance to Demonstrating Consistency* memorandum to help you perform this calculation (refer to [Appendix D](#) to the City's CAP). For example, if you have a mixed-use project with 20 multi-family dwelling units (SFE factor of 0.7) and 10,000 square feet of commercial space (SFE factor of 1.8), then your SFE value would equal 32 single-family dwelling units [equation: (20 x 0.7) + (10 x 1.8) = 32], which is below the screening threshold of 36 single-family dwelling units.

5. MY PROJECT TYPE IS NOT INCLUDED IN THE LIST OF SCREENING THRESHOLDS UNDER STEP 1. HOW DO I PERFORM PROJECT SCREENING?

If a project screening threshold applicable to your project land use(s) is not identified in Step 1, you may calculate your project's GHG emissions and compare them to the 500 MTCO₂e per year screening threshold. If your project does not exceed 500 MTCO₂e per year, then your project is not subject to the measures of CAP and no further preparation of the Checklist is required. If your project does exceed 500 MTCO₂e per year, then you must proceed with completion of Step 2 of the Checklist. When calculating your project's GHG emissions, it may be appropriate, depending on your project circumstances, to consider the net change in emissions. For example, if existing land use(s) on your project site involve activities emitting 200 MTCO₂e per year, and your project would replace those land uses and activities with new ones emitting 600 MTCO₂e per year, then your project's net change in GHG emissions would be 400 MTCO₂e per year, which is less than the 500 MTCO₂e per year screening threshold. Refer to Question 10 for discussion of how to define your project for purposes of performing project level screening.



6. HOW DO I CALCULATE GHG EMISSIONS FOR MY PROJECT?

The City expects that most projects will use the California Emissions Estimator Model (CalEEMod) to calculate GHG emissions. During the project screening stage projects should use CalEEMod to estimate annual GHG emissions from project operational activities. However, there may be limited project-specific circumstances (e.g., projects with relatively low operational emissions and relatively high construction emissions) in which emissions estimates based only on operational activities will not be appropriate for project screening. In these situations, DSD staff may ask for a more customized, project-specific analysis based on the project's specific details and circumstances.

CalEEMod is a statewide land use emissions computer model that calculates GHG emissions resulting from construction and operations for a variety of land use project types. It calculates direct GHG emissions from construction and operation activities (including vehicle use), as well as indirect GHG emissions from activities such as energy use, solid waste disposal, vegetation planting and/or removal, and water use. CalEEMod also includes GHG mitigation measures that users can select and incorporate into project modeling to calculate potential reductions in project emissions.

Use of the model is free of charge. Refer to the [South Coast Air Quality Management District website](#) to download the model and review the User Guide for instructions on its use. Project applicants are expected to use the most recent version of CalEEMod, which is periodically updated.

The City acknowledges that there could be limited project-specific circumstances in which CalEEMod is not the best available model to estimate a project's GHG emissions (e.g., the project land use type is not included in the model). If and when such circumstances arise, an applicant may be able to use an alternate method or modeling tool to calculate project GHG emissions subject to the approval of the Planning Division Manager.

7. MY PROJECT EXCEEDS THE PROJECT SCREENING THRESHOLDS AND/OR ITS ANNUAL EMISSIONS LEVEL WOULD EXCEED 500 MTCO₂e. CAN I PROPOSE MITIGATION MEASURES TO REDUCE MY PROJECT'S EMISSIONS AND AVOID COMPLETING THE REST OF THE CHECKLIST?

No. The project screening thresholds and the 500 MTCO₂e per year level must be strictly applied only for project screening and are not thresholds of significance for the purposes of evaluating a project under CEQA. Projects that exceed the applicable screening threshold may not propose mitigation measures to reduce emissions below 500 MTCO₂e. Projects that exceed the screening level are required to complete Step 2 of the Checklist.



8. MY PROJECT IS CONSISTENT WITH THE GENERAL PLAN LAND USE DESIGNATION BUT NONE OF THE CAP MEASURES ARE APPLICABLE. HOW DO I DETERMINE CONSISTENCY WITH THE CAP?

The City anticipates that most projects will achieve CAP consistency through the Checklist alone. However, if your project is consistent with the General Plan but has unique land uses or circumstances for which no measures in the Checklist would apply, then you may have the option to demonstrate consistency with the CAP through comparison to a numerical GHG threshold of 2.1 MTCO₂e per service population per year. Service population equals the sum of residents and jobs anticipated to be generated by your project.

This numerical GHG threshold approach requires applicants to quantify their GHG emissions in 2030 and estimate reductions from (1) any applicable Checklist measure(s) and from (2) any additional GHG reduction mitigation measures necessary to achieve the numerical GHG threshold.

You may only use this method for your project if warranted by unique project circumstances as determined by the Planning Division Manager. If your project is allowed to use this method, you would still need to complete the entire Checklist (i.e., Steps 1 and 2) and comply with applicable CAP measures to the extent feasible. For additional description of this method refer to [Appendix D](#) to the City's CAP.

9. MY PROJECT REQUIRES A GENERAL PLAN AMENDMENT BECAUSE IT IS NOT CONSISTENT WITH THE EXISTING GENERAL PLAN LAND USE DESIGNATION. HOW DO I PERFORM PROJECT SCREENING IN STEP 1?

First determine if your project is subject to and not exempt from CEQA. Completion of the Checklist is required only for discretionary projects subject to and not exempt from CEQA. Refer to Questions 1 and 2 regarding applicability of the Checklist to projects that are exempt from CEQA. Then compare your project to the screening thresholds in Step 1. If your project does not exceed the applicable project screening threshold(s), then your project's emissions are presumed to be less than 500 MTCO₂e, and no further preparation of the Checklist is required.

If your project does exceed the applicable project screening threshold(s), then you must determine if your project would generate GHG emissions equal to or less than estimated emissions generated under the existing land use designation. If the answer is yes, then proceed with completing Step 2 of the Checklist addressing your project's consistency with the CAP measures.

If the answer is no, then your project is not consistent with the City's CAP and your project will require preparation of a GHG analysis in accordance with the City's *Guidance to Demonstrating Consistency* memorandum and CEQA requirements (refer to [Appendix D](#) to the City's CAP). Your project will be required to incorporate the applicable CAP measures identified in Step 2 of the Checklist, and any other feasible mitigation measures to reduce GHG emissions identified based on the project's GHG analysis and as required by CEQA. Your project will require completion of the Checklist and preparation of a project-specific GHG analysis as part of the CEQA process.



10. HOW DO I DEFINE MY PROJECT WHEN PERFORMING PROJECT SCREENING? AND CAN I CONSIDER THE NET CHANGE IN PROJECT COMPONENTS OR GHG EMISSIONS?

You must include all land use components of your project when performing project screening in Step 1. These instructions for defining your project apply if you are comparing your project to the project screening thresholds for different land use types or calculating your project's GHG emissions to compare them to the 500 MTCO₂e per year screening threshold. Potential project components can include single- and multi-family residential (total dwelling units), commercial and industrial (total square footage), and "other" land uses. If your project site includes existing residential, commercial, industrial, or other land use activities, it may be appropriate for purposes of project screening to define your project or perform your GHG calculations based on the net change in units or square footage and associated activities. Hypothetical conditions, such as those that might be allowed, but have never actually occurred, under existing permits or plans, shall not be used to define a project. Consult with DSD staff to determine the appropriate method for defining your project for purposes of project screening.

11. THE CITY DOES NOT HAVE AN ADOPTED TRANSPORTATION DEMAND MANAGEMENT (TDM) ORDINANCE. IS MY PROJECT REQUIRED TO IMPLEMENT CAP MEASURE T-9 REGARDING TDM STRATEGIES?

CAP Measure T-9 regarding implementation of TDM strategies is included as Question 3, Step 2 of the Checklist. It applies to multi-family and non-residential projects. Such projects that are required to complete Step 2 of the Checklist are subject to Measure T-9. The City not having an adopted TDM ordinance does not affect the applicability of this measure. The City may revise this measure in the Checklist in the future if and when a TDM ordinance is adopted.

12. HOW DO I DETERMINE IF MY PROJECT IS LOCATED WITHIN A HALF-MILE OF A MAJOR TRANSIT STOP WHEN EVALUATING COMPLIANCE WITH CAP MEASURE T-12 REGARDING REDUCED PARKING NEAR TRANSIT?

All four Sprinter stations and some bus stops are considered eligible for reduced parking for Multi-family residential projects on vacant parcels. Consult with DSD staff to confirm if your project is subject to this CAP Measure.

13. HOW OFTEN WILL THE CHECKLIST BE UPDATED?

The City may periodically update the Checklist to incorporate new GHG reduction techniques or to comply with later amendments to the CAP or changes in local, State, or federal law and regulations. Comprehensive updates to this Checklist are anticipated to coincide with future comprehensive updates to the CAP. Administrative updates to the Checklist are anticipated to occur on as-needed basis as necessary to keep the Checklist up-to-date and user-friendly. Updates to the CAP Checklist associated with an update to the City's CAP would also require City Council approval and shall comply with CEQA.



HAVE OTHER QUESTIONS?

Please visit the City's Climate Action Plan webpage by clicking the link or copying it into your web browser.

<https://www.san-marcos.net/departments/development-services/planning/climate-action-plan>

You can also direct your questions and other inquiries to:

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