

Maryland Department of the Environment Additional Draft Strategy for “What We Can Do” Report

Prepared for MWCOG’s Multi-Sector GHG Working Group
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Provide Transparency in Development Projects

This strategy adapts the first step in the San Joaquin Air Pollution Control District’s Rule 9510, also known as the Indirect Source Review (ISR), substituting GHG emissions for the Rule’s focus on NO_x and PM₁₀. The strategy envisions that whenever a developer proposes a new development project over a certain size it would run a GHG modeling analysis for mobile source activity the development attracts or generates during its construction and 10 years of operation. Modeling could include GHG reductions that could be achieved with onsite mitigation measure. The analysis would be shared with the TPB and made available to the public.

Using the Rule as a template, the strategy could cover residential, commercial and industrial development projects which meet certain size thresholds. It would be applied to mobile source emissions during construction, e.g. construction equipment exhaust, and operational emissions, defined in the Rule as “area sources”, i.e. onsite sources such as water heaters, furnaces, fireplaces, wood stoves, etc., and mobile source activity generated by the use of the site following construction.

Just taking the first step of transparency -- modeling and making public the mobile and area source GHG emissions from proposed development projects over a 10 year horizon – would raise public awareness of the emissions impacts of land development. In time this may generate support for the next step in Rule 9510, which requires developers to submit a modeling-based Air Impact Assessment for the Air District’s approval as a condition of getting project approval by the local permitting authorities. Over a 10 year span the project must achieve the emission reduction targets set by the Air District (through onsite reduction measures) or pay a fee for offsite mitigation projects (such as diesel retrofits or transit projects).

At least one California air district is considering ways to link an ISR to its local council of government’s regional development plan. The San Joaquin model could be tweaked in a number of ways, including thresholds for coverage, types of development covered, and the time horizon for operational emissions.