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CHAPTER 1: Project Review & Analysis

Project Review & Analysis

1.1. What is CEQA?

The California Environmental Quality Act (CEQA), enacted in 1970, is the foundation of environmental law and policy in California. CEQA encourages the protection of all aspects of the environment (e.g., water quality, noise, land use, natural resources, transportation, energy, human health, and air quality) by requiring state and local agencies to prepare environmental impact analyses and to make decisions based on those studies' findings regarding the environmental effects of the proposed project and/or action. CEQA applies to projects undertaken by a government entity itself, or projects that are either funded by, or require an entitlement through a public agency that may cause either a direct physical change in the environment, or a reasonable indirect physical change in the environment¹. The agency with primary responsibility for the preparation of an environmental document is known as the **lead agency**. As defined by CEQA, a lead agency means the public agency which has principal responsibility for carrying out or approving a project which may have a significant effect upon the environment². Examples of lead agencies would include local city and county governments, local school districts, etc. During the preliminary review of the project, the lead agency must determine whether CEQA applies to the project being evaluated and whether the project is exempt from the provisions of CEQA. A project is only subject to CEQA if it involves the exercise of an agency's discretionary powers, and falls within the definition of a "project" as defined by CEQA Guidelines³.

A "project" is an activity undertaken by an agency which must receive some discretionary approval (meaning that the agency has the authority to deny the requested permit or approval) from a government agency which may cause either a direct physical change in the environment or a reasonably foreseeable indirect change in the environment.

Generally, the lead agency, in consultation with other relevant agencies, will prepare a preliminary analysis, known as an Initial Study, in order to determine which appropriate environmental document is needed. If the Initial Study concludes that the project may have a significant effect on the environment, an Environmental Impact Report (EIR) should be prepared; otherwise, a Negative Declaration (ND) or Mitigated Negative Declaration (MND) should be prepared.

Additionally, a lead agency is required to consult with some agencies, and is authorized to consult informally with other agencies depending on the agency's jurisdiction over resources affected by the proposed project⁴. The purpose of interagency consultation is to ensure that all affected agencies have a voice in the process.

For any given project many agencies and groups may be involved in the CEQA process. Agencies serve in different roles for different projects. When determining whether to prepare an EIR, the lead agency is required to formally consult with responsible and trustee/public agencies.

A **responsible agency**, as defined by CEQA, means a public agency, other than a lead agency, which has responsibility for carrying out or approving a project⁵. An example of a responsible agency would be a local water district, fire district, air district, etc. which issues permits for specific approvals related to that agency's rules and requirements. A **trustee agency** means a state agency that has jurisdiction by law over natural resources affected by a project, that are held in trust for the people of the State of California⁶. Examples of trustee agencies would include the State Department of Fish and Game, State Department of Parks and Recreation, etc.

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Figure 1-1: Participants in the CEQA Process

Agencies which have some jurisdiction over a specific aspect of a project, but do not fit into one of the two categories above are commonly known as **commenting agencies**. A commenting agency can be any state agency, board or commission, any county, city, regional agency, public district, or redevelopment agency or other public agency⁷. In most cases this is the role of the District. The following section describes the District's role in the CEQA process in more detail.

1.2. The Role of the District in CEQA

As a public agency, the District may act as a lead agency, responsible agency, or commenting agency. In most cases the District acts as a commenting agency for land use projects. As such, this document's primary focus is on the District's role as a commenting agency for land use projects.

The District provides comments on environmental documents such as Notice of Preparations (NOP), Draft Environmental Impact Reports (DEIR), Final Environmental Impact Reports (FEIR), and Notice of Availabilities (NOA) submitted to the District by lead agencies and makes comments directly related to any environmental effects relating to air quality that the District has determined to be appropriate. If requested by the jurisdiction, the District may also submit informal comments on the Administrative Draft Environmental Impact Report (ADEIR).

The District takes its commenting role seriously under CEQA, and does its best to provide timely, detailed comments to assist the lead agency. Of course, it is then up to the lead agency to

incorporate such comments as it sees fit under its discretion as lead agency. The District makes itself available at all stages of environmental review as a resource for local governments within Placer County.

The District acts as a responsible agency when a project or a portion of a project is required to obtain a permit from the District. For example, if a regional shopping center is proposed, and part of the proposal included a gasoline service station which required approval of a permit by the District, then the District would be considered a responsible agency during the review process.

Although rare, in some cases the District may act as a lead agency. The District can change from a responsible agency to a lead agency if a lead agency (1) fails to prepare an environmental analysis as required under CEQA, (2) the District determines that a subsequent EIR is required for the project, (3) the District determines that the adopted/certified EIR, MND, or ND was inadequate and/or the District did not receive any notice of the document when it was circulated, or (4) if a District and a City or County agree that the District should be the lead agency for a particular project.

The District regulates many sources of pollutants in the ambient air. The District is responsible to implement certain programs and regulations for controlling air pollutant emissions to improve air quality in order to attain federal and state ambient air quality standards. In addition to industrial sources, land use projects have the potential to generate air pollutants which result in adverse environmental impacts and are therefore subject to CEQA.



Under CEQA statutes and guidelines, lead agencies are encouraged to seek comments from responsible agencies and any public agency that has jurisdiction by law over resources that may be affected by a land use project⁸. For most development proposals this typically involves the District when projects include vehicle trip generation that is high enough to cause emission levels capable of hindering the District's efforts to attain and maintain the Federal and State ambient air quality standards. Other air quality impacts, such as those associated with greenhouse gasses, odors, and special health related impacts, are also considered during the environmental review phase of a project.

It is important to note that District comments made during the environmental review process are **recommended** to the lead agency. It is the lead agency's responsibility to incorporate all, some, or none of the District's recommendations on any given project.

The following figure illustrates in more detail what the District does.

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Responsibilities of the District

Protect and promote public health by controlling and seeking reductions of air pollutants while recognizing and considering the economic and environmental impacts through the following efforts.

Regulate air pollutant emissions from stationary sources

- ✓ Evaluate emissions/potential emissions and establish permit limitations consistent with District rules, regulations and applicable laws
- ✓ Develop and maintain a vigilant inspection program
- ✓ Provide guidance on implementation of rules and regulations
- ✓ Establish partnerships with industry to promote reductions of emissions
- ✓ Adopt rules/regulations as necessary to further the goals of the District and to meet state and federal mandates

Seek quantitative reductions in amounts of air pollutants being released within the County

- ✓ Identify and regulate new sources of emissions
- ✓ Alleviate toxic and nuisance emission impacts upon the public
- ✓ Provide economic incentives for emission reductions
- ✓ Deter emission violations through the enforcement of District rules, and laws
- ✓ Increase resources applied to mitigation measures
- ✓ Provide public education about sources, effects, and methods of reduction
- ✓ Modify and/or incorporate new rules and regulations as appropriate

Respond to and investigate non-compliant events and sources of emissions in an efficient manner

- ✓ Initiate measures to allow sources to gain compliance
- ✓ Establish a hierarchical enforcement system that yields appropriate sanctions
- ✓ Partner with other agencies when feasible to assist in field response

Recommend effective planning measures

- ✓ Maintain and enhance a collection system regarding emission inventory and air shed properties throughout the basins
- ✓ Prepare and update air quality plans to maintain or achieve standards
- ✓ Review development plans for impacts on air quality when asked by Lead Agencies.
- ✓ Fulfill our duty as a Responsible Agency when required

Figure 1-2: Responsibilities of the District

1.3. Early Consultation

The District encourages local jurisdictions and project applicants to address air quality issues as early as possible in the project planning stage. Addressing land use and site design issues while a proposed project is still in the conceptual stage increases opportunities to incorporate project design features to minimize land use compatibility issues and air quality impacts. By the time a project enters the CEQA process, it is usually more costly and time-consuming to redesign the project to incorporate mitigation measures. Early consultation may be achieved by including a formal step in the jurisdiction's development review procedures or simply by discussing air quality concerns by making an initial contact with the District regarding a proposed development. Regardless of the specific procedures a local jurisdiction employs, the District encourages consultation in order to incorporate features into a project that minimize air quality impacts before significant resources (public and private) have been devoted to the project.

The following air quality considerations warrant particular attention during early consultation between lead agencies and project proponents:

- Land use and design measures to encourage alternatives to the automobile, conserve energy and reduce project emissions;
- Land use conflicts and exposure of sensitive receptors to odors, toxics and criteria pollutants;
- Applicable District rules, regulations and permit requirements; and
- Current District approaches to GHG analysis and mitigation.

1.4. Types of Projects Generally Reviewed by the District under CEQA

Any project which is subject to CEQA review by local jurisdictions can be forwarded to the District by the lead agency for screening to determine District involvement. In general, any proposed project with **short-term construction** emissions or **long-term operational** emissions as identified in this handbook should be submitted to the District for review. The project will be evaluated to determine the potential for significant air quality impacts, with further analysis or mitigation recommended if appropriate.

- ✓ See [CHAPTER 3](#): for further detail on construction emissions.
- ✓ See [CHAPTER 4](#): for further detail on operational emissions.
- ✓ See [CHAPTER 5](#): for further detail on GHG emissions.

Types of projects generally subject to CEQA review include:

- General Plans
- Specific Plans
- Use Permits
- Tentative Subdivision/Parcel Maps
- Design Reviews (i.e., tiered from a previously approved specific plan)
- Public Works Projects
- Clearing or grading of land
- Improvements to existing public structures
- Enactment and amendment of zoning ordinances

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1.5. District Steps in Processing an Application

As mentioned previously, the vast majority of CEQA documents that are reviewed by the District are done so with the District taking the role as a “commenting agency.” The following are the summary of internal steps that the District follows when acting as a commenting agency. More detailed discussion for each step is described in the following chapters.



Figure 1-3: District Steps in Reviewing Land Use Projects

Step 1: Initial Review of Project

When the District receives a Notice of Preparation or an application forwarded by the lead agency for a proposed project, where an environmental document (e.g., Initial Study) will be prepared, the District can assist the lead agency to evaluate potential air quality impacts associated with the project. Review of potential impacts that should be considered during the preparation of the Initial Study typically include verifying emission sources associated with the project, reviewing existing air quality conditions, and/or verifying potential conflicting neighboring land uses. The Initial Study should also consider all phases of project planning, construction and operational impacts, as well as cumulative impacts.

Step 2: Modeling Analysis

A good modeling analysis is the key foundation for providing scientific data and support for a project's related impact analysis and conclusions. Where there is the potential for a proposed project to generate substantial amounts of criteria pollutants or result in a potentially conflicting land use, a modeling analysis can be used to estimate the project's emissions and potential risk levels. The District will review the modeling analysis results provided by the lead agency to verify if the analysis is appropriate to determine the project related air quality impacts.

When reviewing an air quality modeling analysis, District staff will review the associated sections or chapters of the environmental document (e.g., project description, land use,

What is included in a good modeling analysis?

A modeling analysis is an air quality impact analysis based on scientific data which includes project specific data including, but not limited to:

- Timeframes for construction and operation;
- Reasonable assumptions with supporting citations;
- Description of energy source providers, land use and climate zone settings applicable to the project area; and
- Consistency with project specific data (e.g., VMT from the project's traffic study or water usage from the project's water study).

traffic analysis, and air quality) to verify the accuracy of modeling results and any environmental conclusions based on those results. District staff will also review the analysis to identify if all emission sources generated by the project, the existing air quality conditions, and neighboring land uses were considered. District staff may, at its discretion, also prepare an internal modeling analysis for projects under review to further assist the lead agency. This additional modeling analysis would be based on the project description and related information provided by the lead agency. If the preliminary information submitted by the applicant is not sufficient to perform the modeling analysis, the District may request that the lead agency obtain additional information from the applicant. If the additional requested information is not received, then the District will not be able to perform internal modeling. In such cases, the District may notate such in their comments related to the project.

- ✓ See [CHAPTER 3](#): and [CHAPTER 4](#): for additional information on analyzing air quality impacts.
- ✓ Free download of the model, user manual, and information on CalEEMod are available at www.caleemod.com.

Step 3: Comparing to Applicable Thresholds of Significance

The modeling analysis results are then compared to the applicable thresholds of significance for project related construction and operational emissions. For more information and discussion on applicable thresholds, please see [CHAPTER 2](#):. If results demonstrate that project-related emissions to be less than applicable thresholds, no mitigation measures would be required and a less-than-significant conclusion can be determined by the lead agency. If the modeling results demonstrate the potential for the project-related emissions to exceed thresholds, the project related air quality impacts may be potentially significant and mitigation measures should be implemented to reduce air quality impacts.

- ✓ See [CHAPTER 2](#): for additional information on applicable thresholds of significance."

Step 4: Identify Mitigation Measures

As stated above, mitigation measures should be implemented when project-related emissions are identified to exceed applicable thresholds. Proposed mitigation measures are then selected and evaluated to determine if the project-related emissions can be reduced below applicable thresholds. The District may assist the lead agency to determine if the mitigation is sufficient enough to demonstrate that project-related emissions can be reduced below the thresholds. The District will evaluate the effectiveness of the proposed on-site mitigation measures to verify if the project related construction and operational emissions are reduced below the applicable thresholds after mitigation implementation. If the District is concerned that the proposed mitigation is not sufficient enough to reduce criteria pollutants below the thresholds, the District will recommend to the lead agency that the project either implement additional on-site measures, or recommend that the project participate in the District's Off-Site Mitigation Program. More information on the Off-Site Mitigation Program is available in [Appendix H](#):

NOTE: When analyzing mitigation measures, it is the District's preference that lead agencies utilize on-site measures rather than offsite measures.

- ✓ See [APPENDIX A](#) for the District's "standard" construction mitigation measures;
- ✓ [Appendix C](#): for operational mitigation measures; and
- ✓ [Appendix G](#): for GHG mitigation measures.

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Step 5: District's Response

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The District will submit to the lead agency a comment letter summarizing the District's findings and any recommendations which may assist the lead agency to further reduce potential impacts associated with a project.

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A Note about Modeling Tools

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For the modeling application, the District recommends CalEEMod (California Emissions Estimator Model) as the software used in air quality modeling analysis. CalEEMod is a land use emissions computer model developed in collaboration with other air districts of California. It is designed to quantify potential direct criteria pollutants and greenhouse gas (GHG) emissions associated with the construction and operation of land uses such as residential and commercial facilities as well as indirect emissions, such as GHG emissions from energy production, solid waste handling, vegetation planting and/or removal, and water conveyance. In addition, CalEEMod calculates the benefits from implementing mitigation measures, including GHG mitigation measures, developed and approved by the California Air Pollution Control Officers Association (CAPCOA). Those using the model include environmental consultants/professionals, public agency land use planners, air quality Districts, CEQA/NEPA document reviewers, land use developers, and decision-makers.

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Currently, CAPCOA is upgrading the CalEEMod with the latest CARB Mobile Emission Model (EMFAC2011). Once CalEEMod has been updated, URBEMIS will no longer be recommended by the District due to outdated mobile source emission factors. However, for those projects where the NOP has been issued prior to the date of the release of the handbook, and/or projects that have been scoped to use URBEMIS prior to the release date of handbook, the District will recognize URBEMIS as the modeling tool for the project.

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For road construction projects, another model recommended by the District is the Sacramento Metropolitan Air Quality Management District (SMAQMD) [Roadway Construction Emissions Model](#) which assesses the emissions of linear construction projects. This model can be accessed via the SMAQMD website at www.airquality.org. This model provides a more precise analysis of road construction, road widening, etc. than CalEEMod.

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1.6. Minimum Project Information Needed for District Review

As previously discussed, early consultation with the District can ensure the environmental document adequately addresses air quality issues. Also please note that the submittal of an incomplete application could result in further delays in project review.

Minimum Information Needed

In order to facilitate our review of the proposed project, the following minimum information should be provided:

- a. Complete and accurate project description;
- b. Modeling emission calculations for both construction and operational phase emissions; Temporary construction impacts, such as fugitive dust and combustion emissions from construction and grading activities should be quantified and mitigation measures proposed;
- c. Relevant environmental documents previously associated with a project, including any previously prepared Initial Studies, NDs, MNDs, EIRs, etc; and
- d. Other technical analyses that relate to air quality, including but not limited to traffic analysis, growth impact projections, land use elements, maps, health risk assessments, sensitive receptor locations etc.

1.7. Information to be Included in Environmental Documents

In addition to the "Minimum Information Needed" as described above, the District recommends that environmental documents should include air quality information within the following sections:

Environmental Setting

An Environmental Setting should be included when discussing air quality within an environmental document.

Within the "Environmental Setting" section of the document there should be a discussion of the physical environment conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. In terms of air quality, this includes any existing sources of air pollution (i.e., an adjacent highway). The environmental document should discuss pollutants which may be generated by the proposed project. Pollutants of concern when reviewing land use projects include carbon monoxide (CO), ozone(O₃), Nitrogen Oxides (NO_x), Reactive Organic Compounds (ROGs), sulfur dioxides (SO₂), particulate matter up to 10 microns and 2.5 microns in diameter (PM₁₀ and PM_{2.5}, respectively), and lead (Pb). Toxic Air Contaminants (TAC) of concern includes emissions from stationary and on-road/off-road mobile sources, and naturally-occurring asbestos.

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There should also be some discussion within the environmental setting of any inconsistencies between the proposed project and any applicable general plan, community plan, or specific plan⁹. The lead agency may also consider adding discussion of consistency with policies and standards, as they relate to an applicable plan, within the regulatory setting.

Regulatory Setting

The District has responsibility for controlling air pollution emissions including "criteria air pollutants" and "toxic air pollutants" from direct sources (such as factories) and indirect sources (such as land-use projects) to improve air quality in order to attain federal and state ambient air quality standards.

As a part of the Sacramento federal ozone nonattainment area, the District works with the other local air Districts within Sacramento area to develop a regional air quality management plan under the Federal Clean Air Act (FCAA) requirement.

This management plan is called a State Implementation Plan (SIP) which describes and demonstrates how Placer County, as well as the Sacramento nonattainment area, would attain the required federal 8-hour ozone standard by the proposed attainment deadline. One of the proposed mitigation strategies in the SIP is to recommend and implement mitigation measures through the review of land use projects at the local level.

The Sacramento Regional 8-hour Ozone Attainment and Reasonable Further Progress Plan was prepared to meet requirements of the federal Clean Air Act for the 1997 8-hour ozone standard. This Sacramento Ozone SIP demonstrates how the region is going to reduce emissions and attain the 1997 ozone standard no later than 2018. After this SIP approval, EPA amended its 8-hour ozone standard in 2008, with implementation to begin in 2011. A new ozone SIP to meet the 2008 ozone standard will be prepared for the Sacramento nonattainment area.

The U.S. EPA and the California Air Resources Board have set standards for allowable levels of criteria air pollutants in the air. Typically, the California standards ([California Ambient Air Quality Standards](#), or CAAQS) are stricter and more health protective than the national standards ([National Ambient Air Quality Standards](#), or NAAQS). States and localities are required to monitor the ambient concentrations of these pollutants. This information is used to determine if an area attains or violates a particular air quality standard.

- ✓ For the current attainment statuses in Placer County go to [Table 1-1: Ambient Air Quality Standards & Designations](#).
- ✓ The most current state and federal air quality standards are available at: <http://www.arb.ca.gov/desig/adm/adm.htm>.
- ✓ The most current designations in California are available at: www.arb.ca.gov/desig/desig.htm.
- ✓ More information regarding the Sacramento Ozone SIP can be found at: <http://www.airquality.org/plans/federal/ozone/index.shtml>

What is a SIP?

- A SIP is a comprehensive plan that describes how an area will attain national ambient air quality standards.
- Local air Districts are required to prepare SIP elements and are given specific deadlines to submit them to ARB for review and approval.
- ARB forwards SIPS to the US EPA for approval and publication.

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Table 1-1: Ambient Air Quality Standards & Designations

Ambient Air Quality Standards & Designations*									
Pollutants	Average Time	State Classification	State Attainment Status			Federal Classification	Federal Attainment Status		
			S V A B	M C A B	L T A B		S V A B	M C A B	L T A B
Ozone	1 hr	0.09 ppm	N	N	A	None	--	--	-
	8 hr	0.070 ppm	N	N	N	0.075 ppm	N	N	U - A
Particulate Matter PM ₁₀	24 hr	50 ug/m ³	N	N	N	150 ug/m ³	A	A	A
	Annual	20 ug/m ³	N	N	N	None	--	--	-
Fine Particulate Matter PM _{2.5}	24 hr	No Separate State Standard	--	--	--	35 ug/m ³	N	U	U
	Annual	12 ug/m ³	A	U	A	15 ug/m ³	A	U	U
Carbon Monoxide (CO)	1 hr	20 ppm	A	U	A	35 ppm	A	A	A
	8 hr	9 ppm	A	U	A	9 ppm	A	A	A
	Tahoe 8 hr	6 ppm	--	--	A	None	--	--	-
Nitrogen Dioxide (NO ₂)	1 hr	0.18 ppm	A	A	A	100 ppb	--	--	-
	Annual	0.030 ppm	--	--	--	0.053 ppm (100 ug/m ³)	A	A	A
Sulfur Dioxide (SO ₂)	1 hr	0.25 ppm	A	A	A	0.075 ppm (196 ug/m ³)	--	--	-
	24 hr	0.04 ppm	A	A	A	0.14 ppm	A	A	A
	Annual	None	A	U	A	0.030 ppm	A	A	A
Lead	30 day average	1.5 ug/m ³	A	A	A	None	--	--	-
	Calendar Quarter	None	--	--	--	1.5 ug/m ³	A	A	A

Footnotes:

A=Attainment

N=Non-Attainment

U=Unclassified

U-A=Unclassified/Attainment

*Air Quality Statuses are based on the latest updates (June, 2012) from CARB website.

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Plans, Policies, Regulations, and Laws

Environmental documents should include a discussion of current District laws, regulations and policies. In order to accomplish both federal and state mandates, the District offers a review process for land use projects including 1) thresholds of significance based on modeling analysis, and 2) evaluation process including the identification of feasible mitigation measures.

Ambient Air Quality Standards

Ambient air quality standards (AAQS) define clean air, and are established to protect even the most sensitive individuals in our communities. An air quality standard defines the maximum amount of a pollutant that can be present in outdoor air without harm to the public's health. California law authorizes CARB to set ambient (outdoor) air pollution standards (California Health & Safety Code Section 39606) in consideration of public health, safety and welfare¹⁰.

The District recommends the following language (or similar) for use within environmental documents when discussing the air basin in which the project is located.

Sacramento Valley Air Basin (SVAB)

"The project site is located within the SVAB and is under the jurisdiction of the Placer County Air Pollution Control District. The SVAB is designated as nonattainment for federal and state ozone (O₃) standards, nonattainment for the federal particulate matter standard (PM_{2.5}) and state particulate matter standard (PM₁₀)."

Mountain Counties Air Basin (MCAB)

"The project site is located within the MCAB and is under the jurisdiction of the Placer County Air Pollution Control District. The MCAB is designated as nonattainment for federal and state ozone (O₃) standards, nonattainment for the state particulate matter standard (PM₁₀)."

Lake Tahoe Air Basin (LTAB)

"The project site is located within the LTAB and is under the jurisdiction of the Placer County Air Pollution Control District. The LTAB is designated nonattainment for the state particulate matter standard (PM₁₀)."



Figure 1-4: Placer County Air Basins

1.8. Additional Analysis in Environmental Documents

As stated above, additional analysis may be recommended by the District to determine if potential impacts may occur.

- a) Depending on the nature of the project, a thorough emission analysis should be performed on all relevant emission sources, using emission factors from the EPA document AP-42 "[Compilation of Air Pollutant Emission Factors](#)," the latest approved version of EMFAC, OFF-ROAD or other approved emission calculator tools. The emissions analysis should include calculations for estimated emissions of all criteria air pollutants and toxic air contaminants released from the anticipated land use mix on a quarterly and yearly basis. Documentation of emission factors and all assumptions as well as the modeling inputs and outputs (e.g., anticipated land uses, average daily trip rate from trip generation studies, etc.) should be provided in an appendix.
- b) If a project has the potential to emit toxic or hazardous air pollutants including diesel exhaust, and is located in close proximity to sensitive receptors, impacts may be considered significant due to increased cancer risk for the affected population, even at very low levels of emissions. Such projects may be required to prepare a risk assessment to determine the potential level of risk associated with their operations. The District should be consulted on any project with the potential to emit toxic or hazardous air pollutants. Pursuant to the requirements of California Health and Safety Code Section 42301.6 (AB 3205) and Public Resources Code Section 21151.8, subd. (a)(2), any new school or proposed industrial or commercial project site located within 1000 feet of a school should be referred to the District for review.
- c) CARB has determined that emissions from sources such as roadways and distribution centers (and to lesser extent gas stations), certain dry cleaners, marine ports and airports as well as refineries can lead to unacceptably high health risk from diesel particulate matter and other toxic air contaminants. If the proposed project is located in close proximity to any of the listed sources a health risk screening and/or assessment should be performed to assess risk to potential residence of the development. For additional information, please refer to the following:
 - ✓ CARB's Land use Handbook (2005): <http://www.arb.ca.gov/ch/landuse.htm>
- d) A cumulative impact analysis should be done to evaluate the combined air quality impacts of this project and impacts from existing and proposed future development in the area.
- e) Naturally-occurring asbestos (NOA) may exist at the site. A geological survey is required for the site if it is located in any of the District identified naturally-occurring asbestos areas. If naturally-occurring asbestos is found, the environmental document should indicate that a plan will be developed to comply with the requirements listed in the Air Resources Board's Asbestos ATCM for Construction, Grading, Quarrying, and Surface Mining Operations. If a project is located in an identified NOA area and naturally-occurring asbestos is not present at the site, an exemption request will need to be filed with the District.
- f) Mitigation measures relating to air quality should be implemented, as appropriate, as discussed in Chapters 3, 4, and 5 of this document.
- g) If it is determined by the lead agency that an EIR is the appropriate environmental document then it should include a range of alternatives to the proposed project that could effectively minimize air quality impacts. Please note that impacts associated with

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any "Alternatives" in a DEIR could be analyzed on a *qualitative* basis, while the proposed project (*i.e.*, Preferred Alternative) could be reviewed on a *quantitative* basis. All calculations and assumptions used should be fully documented in an appendix to the DEIR. The District recommends that the EIR consultant contact District staff if additional information and guidance is needed.

1.9. Use of a Previously Certified EIR (Tiering)

Tiering is defined as, "using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan, specific plan, or a policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the *general discussions* from the broader EIR; and concentrating the later EIR or negative declaration *solely on the issues* specific to the later project¹¹." A land use project may be required by the lead agency to implement mitigation measures which were identified by the previous certified EIR in order to mitigate impacts. However, the previous certified EIR could be outdated due to the time lag between its environmental analysis and newer more restricted ozone standards, emission analysis and impacts model updates. Mitigation measures initially identified in the original environmental document may not be sufficient to offset the project's related cumulative impacts in today's environment.

Section 15152. (f) of the CEQA Guidelines state that, "A later EIR shall be required when the Initial Study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR." It is the recommendation of the District that previously certified EIRs that have not addressed current, relevant air quality issues be used with caution by lead agencies. For example, EIRs certified prior to the adoption of AB32, September 2006, will likely be considered to be inadequate for any proposed "tiered" review in order to mitigate impacts associated with a project due to the fact that the older EIR could not have adequately addressed current law pertaining to greenhouse gases.

The District will review all projects which propose tiering off a previously certified EIR and will make recommendations to the lead agency whether or not the previously certified EIR adequately addresses all, pertinent air quality issues.

- ✓ See [CHAPTER 5](#): for guidance on Greenhouse Gas "tiering" related to the adherence to approved Climate Action Plans.

1.10. Baseline Considerations

CEQA defines baseline as a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. When a project involves a conversion or reduction in current emission rates, or the project already has permits related to emissions, the lead agency should plan to work with the District in developing a strategy related to baseline conditions and how such conditions are described within a project description. There is an ever changing landscape within the CEQA case law that makes this topic complicated. Beyond standard support, the District is also available to support lead agencies with determining whether a project falls within CEQA, or assisting with what type of review under CEQA may be needed in relation to the complicated baseline issues.



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