

## **El Dorado County APCD – CEQA Guide**

### **Executive Summary**

**Purpose (Chapter 1).** This document is a Guide, to be used during the Initial Study phase of the CEQA process, for determining whether a project will have “significant” air quality impacts. If significant air quality impacts are determined to exist, an Environmental Impact Report (EIR) must be prepared; if not, a Negative Declaration (or Mitigated Negative Declaration) can be prepared. This Guide will be used by the District for reviewing projects for which it is the Lead Agency; otherwise, the District will use it to provide comments as a Responsible Agency or Commenting Agency. The District recommends that the Guide be used by other county agencies in the Lead Agency role, and by project proponents.

**Existing Air Quality Levels (Chapter 2).** El Dorado County is divided among two air basins, Mountain Counties and Lake Tahoe. With two exceptions, the county is in attainment for all state and national ambient air quality standards (AAQS). The Mountain Counties portion of the County is a “severe” nonattainment area for the state and national 1-hour AAQS for ozone, and both the Mountain Counties and Lake Tahoe air basin portions of the county are nonattainment with respect to the state 24-hour PM<sub>10</sub> AAQS.

**Coordination With Other Air Districts (Chapter 2).** This Guide is generally based on the criteria and technical approach being developed by all five air districts in the greater Sacramento area. In particular, it is coordinated with the Sacramento Region Ozone Air Quality Attainment Plan (AQAP).

**Types of Emission Sources (Chapters 4, 5, and 6).** Several types of emission sources need to be considered when evaluating the impacts of a project under CEQA. For many development projects, motor vehicle trips are the principal source of air pollution. Projects in this category, such as shopping centers, office buildings, arenas, and residential developments, are often referred to as “indirect sources.” This is because they do not directly emit significant amounts of air pollutants from onsite activities, but cause additional emissions from motor vehicles traveling to and from the development.

Most development projects also generate “area source” emissions. Area sources are sources that individually emit fairly small quantities of air pollutants, but which cumulatively may represent significant quantities of emissions. Water heaters, fireplaces, lawn maintenance equipment, and application of paints and lacquers are examples of area source emissions.

Certain projects also may directly generate stationary or “point” source emissions from operations. Although most area sources discussed above are stationary, the term stationary or point source usually refers to equipment or devices operating at industrial and commercial facilities. Examples of facilities with stationary sources include manufacturing plants, quarries, print shops and gasoline stations.

Finally, consideration must be given to emissions from the operation of equipment and vehicles, as well as dust emissions, during the construction phase of a project. In some

cases, construction emissions, even though they are temporary, may be greater than emissions from subsequent operation of the project.

**Quantitative Significance Criteria (Chapter 3).** A project will be considered as having “significant” air quality impacts if any of the following quantitative conditions exist:

- **ROG and NOx.** The project will result in construction or operations emissions of either of the two primary precursors of ozone, reactive organic gases (ROG) or oxides of nitrogen (NOx), in excess of 82 lbs/day. These criteria are based on the emissions levels that trigger “offsets” for stationary sources under District Rule 523. Special requirements for determining significance may apply in the Lake Tahoe Air Basin, as imposed by the Tahoe Regional Planning Agency (TRPA) in interpreting its 0.08 ppm one-hour “significance threshold” for ozone.
- **Other Pollutants.** The project will result in construction or operation emissions of other pollutants (PM<sub>10</sub>, CO, SO<sub>2</sub>, NO<sub>2</sub>, Sulfates, Lead) that could cause or contribute to violations of any applicable national or state AAQS (including visibility). The applicable AAQS are set forth in Appendix B. In the Lake Tahoe Air Basin, the TRPA visibility standard is applied.
- **Toxic Air Contaminants (Chapter 7).** The project will result in construction or operations emissions of toxic air contaminants (TACs) that cause a lifetime cancer risk greater than one in one million (10 in one million if best available technology for toxic air contaminants is applied), or ground-level concentrations of non-carcinogenic TACs with a Hazard Index greater than 1. Special attention is given to asbestos emissions and Diesel engine emissions.
- **Cumulative Impacts (Chapter 8).**
  - **ROG and NOx.** The project requires a change in the land use designation (e.g., general plan amendment or rezone) that increases ROG and NOx emissions compared to the prior approved use, and the increase in emissions exceeds the “project alone” significance levels shown above for ROG or NOx.
  - **CO.** Project CO emissions, if combined with CO emissions from other nearby projects, result in a “hotspot” that violates a state or national AAQS.
  - **Other Pollutants.** The project is primarily an industrial project and a modeling analysis indicates that the project’s impacts would exceed Class III Prevention of Significant Deterioration (PSD) increments (Class II in Lake Tahoe) for PM<sub>10</sub>, SO<sub>2</sub>, or NO<sub>2</sub>; or, the project is primarily a development project, and the emissions of ROG, NOx, or CO exceed the “project alone” significance criteria for those three pollutants noted above. (CO is used as a surrogate for other impacts in the latter case.)

– **TACs.** The project causes the risk analysis criteria above for “project alone” TACs to be exceeded when project emissions of TACS are considered in conjunction with TACs from other nearby projects.

**Qualitative Significance Criteria (Chapter 3).** In addition, the Guide considers a project significant if any of the following qualitative criteria are met:

- **CEQA Guidelines Appendix G.** The project triggers any of the air quality significance criteria in Appendix G of the CEQA Guidelines.
- **Odors.** The project results in excessive odors, as defined under the Health & Safety Code definition of an air quality nuisance.
- **Sensitive Receptors.** The project results in land use conflicts with sensitive receptors, such as schools, elderly housing, hospitals or clinics, etc.
- **District Rules and Regulations.** The project, as proposed, is not in compliance with all applicable District rules and regulations.
- **Conformity (Chapter 9).** The project does not comply with U.S. EPA general and transportation “conformity” regulations.

**Project Screening and Calculations (Chapters 4, 5, and 6).** Screening or “de minimis” levels of emissions are identified that may allow a smaller project or project with minimal emissions to be classified as not significant without going through calculation procedures or emissions modeling, unless special considerations apply. Where screening does not apply (or where calculation of actual emissions is otherwise desired), the Guide contains specific methods and techniques for calculating emissions, with references to applicable emissions models where appropriate. Screening and calculation approaches are given separately for construction emissions (Chapter 4), ROG and NO<sub>x</sub> emissions from operation (Chapter 5), and other pollutants emitted during operation such as CO and PM<sub>10</sub> (Chapter 6).

**Mitigation (Chapters 4, 5, and 6).** The Guide states that exceeding the significance criteria can be avoided by incorporating mitigation measures into a project prior to undertaking or completing the Initial Study. Various mitigation measures are listed both for project construction and operation.