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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 the environmental review of land use development 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 foreseeable 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 the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment². Examples of possible "lead agencies" include state agencies, local city and county governments, local school districts, special districts, etc. During the preliminary review of a project, the lead agency must determine whether CEQA applies to the project being evaluated. 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. If an action taken is considered a project under CEQA, some analysis must be done, but it could simply mean that the project requires a minimum level of review because it may qualify for an exemption.

A "CEQA project" means an activity/action which may have a potential to result in either a direct physical change or a reasonably foreseeable indirect change in the environment and will involve the exercise of a lead agency's discretionary powers.

Once an agency has determined that an action is considered a project and that it is not eligible for an exemption, the agency, in consultation with other relevant agencies, prepares a preliminary analysis, known as an Initial Study in order to determine the level of significance for a project's potential environmental impacts and what type of 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) will be prepared; otherwise, a Negative Declaration or Mitigated Negative Declaration with mitigation measures will be prepared.

A lead agency is required to consult with some agencies, and is authorized to consult informally with other agencies depending on the lead agency's jurisdiction over resources affected by the proposed project⁴. The purpose of the 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 as they serve in different roles for different projects. When determining whether to prepare an EIR, the lead agency is required to formally consult with responsible agencies, trustee agencies, and/or commenting agencies.

¹ California Public Resources Code §21065

² California Public Resources Code §21067

³ California Public Resources Code §15378

⁴ California Public Resources Code §21082.1

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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. Although most often the District is a commenting agency, it may act as a responsible agency when a project or a portion of a project is required to obtain a District operating permit. A **trustee agency** means a state agency that has jurisdiction by law over natural resources affected by a project which that are held in trust for the people of the State of California⁶. Examples of "trustee agencies" includes the State Department of Fish and Game, State Department of Parks and Recreation, etc.

Public agencies with jurisdiction by law over a specific natural resource area, but which do not fit into one of the three categories above are commonly known as **commenting agencies**. A commenting agency can be any state agency, board or commission, county, city, regional agency, public district, redevelopment agency, or other public agency defined by CEQA⁷. In most cases this is the role held by the District. Figure 1-1 shows the participants in the CEQA review process. The following section describes the District's role in the CEQA review process in more detail.



Figure 1-1: Participants in the CEQA Process

Under CEQA, lead agencies are encouraged to seek comments from responsible agencies along with any public agency that has jurisdiction by law over resources that may be affected by a land use project⁸. Local air districts in California were established by the California Health and Safety Code (HSC) as a public agency having primary responsibility for overseeing and regulating air pollution within a jurisdictional area⁹. To attain federal and state ambient air quality standards, California air districts implement certain regulations and programs for controlling air pollutant emissions from industrial and other emissions sources in order to improve air quality.

⁵ California Public Resources Code §21069
⁶ California Public Resources Code §21070
⁷ California Public Resources Code §21063
⁸ California Public Resources Code §21153
⁹ California Health and Safety Code §40000

The District has the responsibility of managing air quality within Placer County to protect and promote public health through education, regulation, voluntary emission reduction programs, and by funding activities that reduce air pollutants. The District believes that there is a nexus between air quality and how land is developed and utilized throughout Placer County. In order to fulfill this responsibility, the District takes an active role in the inter-governmental review process under CEQA to assist lead agencies with environmental review when a project would result in air pollutant emissions within Placer County.

1.2. Current Environmental and Regulatory Settings in Placer County

Environmental Setting

Placer County is located in northeastern California and covers approximately 1,500 square miles of diverse geography with elevations from 45 to over 6,000 feet between Sacramento County and the Nevada State border. Placer County is unique in that it is the only county which includes portions of three (3) different air basins: the Sacramento Valley Air Basin, the Mountain Counties Air Basin, and the Lake Tahoe Air Basin, as shown in Figure 1-2. Each air basin within Placer County has its own geographical and meteorological features.

Sacramento Valley Air Basin (SVAB)

The western part of Placer County is located within the Sacramento Valley Air Basin (SVAB), which is bounded by the coast ranges on the west and the Sierra Nevada Mountains on the east. The weather is characterized by hot, dry summers and mild, wet winters.

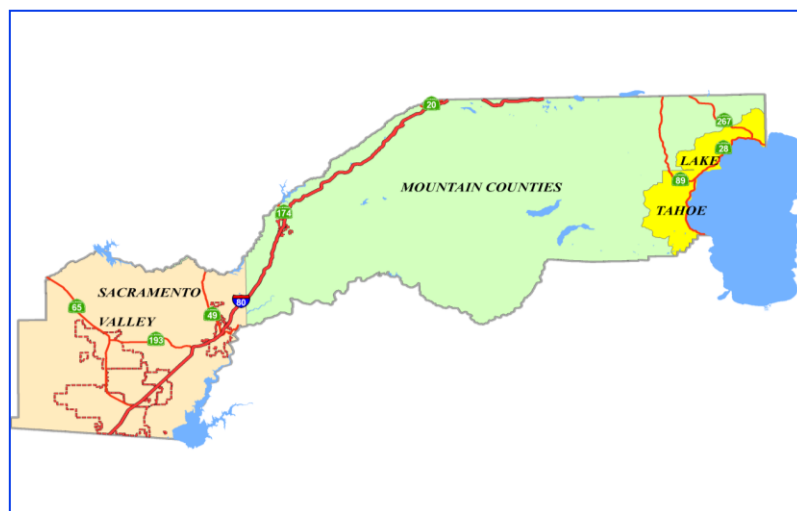
Mountain Counties Air Basin (MCAB)

The central part of Placer County is within the Mountain Counties Air Basin (MCAB). The MCAB includes the central and northern Sierra Nevada mountain range with elevations ranging from several hundred feet in the foothills to over 6,000 feet above mean sea level along the Sierra Crest. The MCAB generally experiences warm, dry summers and wet winters.

Lake Tahoe Air Basin (LTAB)

The eastern part of Placer County is within the Lake Tahoe Air Basin (LTAB). Lake Tahoe lies in a depression between the crests of the Sierra Nevada and Carson ranges on the California-Nevada border, with the mountains approximately 8,000-9,000 feet in height on average surrounding the Lake. The LTAB is shared between the states of California and Nevada. Because of its special geographical features, the LTAB develops its own special meteorological regime which is characterized by weak calm winds and a strong inversion layer. The LTAB generally has cooler, dry summers and cold, wet winters.

Figure 1-2: Placer County Air Basins



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Ambient air quality in each air basin is generally determined by climatological conditions, the topography of the air basin, and the type and amounts of pollutants emitted.

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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 within Placer County. To do so, the District adopts rules, regulations, policies, and programs to manage the air pollutant emissions from various sources. The District’s goal is to achieve and maintain the ambient air quality standards throughout Placer County. [APPENDIX A](#) summarizes the District’s rules and regulations that might be applicable to land use projects.

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Ambient air quality standards are established to protect human health with an adequate margin of safety for the individuals in our communities. The United States Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) have set standards for allowable levels of criteria pollutants’ concentrations in the air. Typically, the standards established by U.S. EPA are referred to as the federal standards ([National Ambient Air Quality Standards](#), or NAAQS) and the standards established by CARB are referred to as the state standards ([California Ambient Air Quality Standards](#), or CAAQS). Air monitoring data gathered from either the state or local air monitoring networks helps determine if an area attains or violates a particular air quality standard.

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A nonattainment area is an area where the measured air pollutant’s concentration is above either the federal and/or state ambient air quality standards. Depending on the level of severity, a classification will be designated to a nonattainment area. Table 1-1 shows the current attainment/nonattainment status for the federal and state air quality standards for the three air basins in Placer County. Portions of Placer County are within the Sacramento federal nonattainment area for ozone and PM2.5. The District works with the other local air districts within the Sacramento area to develop the regional air quality management plan. The Sacramento regional air quality management plan is a part of the State Implementation Plan (SIP) which describes and demonstrates how the Sacramento Region proposes to attain the federal air quality standards. One of the proposed mitigation strategies in the SIP is to recommend and implement mitigation measures through the review of local land use projects.

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What is a SIP?

- A State Implementation Plan (SIP) is a comprehensive plan required by the federal Clean Air Act that describes how a nonattainment area will attain national ambient air quality standards by the specific deadline.
- The SIP includes development of a baseline emission inventory, computer modeling analysis, evaluation of the federal, state and local regulations, mitigation commitments, and an attainment demonstration.
- The SIP which is prepared by local air districts needs to meet the statutory deadlines for the submittal to CARB and the U.S. EPA for review and approval.
- All of the SIP mitigation commitments are valid until fully implementation.

Ozone

The Sacramento area has been designated as nonattainment for the 2008 federal 8-hour ozone standards (0.075 ppm). Currently, the District, as well as the other air districts within the Sacramento regional ozone nonattainment area, are working on the plan which describes and identifies mitigation strategies on how the Sacramento area can attain the federal 2008 8-hour ozone standard with an attainment deadline in 2026. On October 1, 2015, U.S. EPA lowered the 8-hour ozone standard to 0.070 ppm. Based on this revised standard, a new area classification with attainment deadline will be given to the Sacramento area and another ozone SIP will be prepared for this revised standards.

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Table 1-1: Ambient Air Quality Standards & Area Designations

Ambient Air Quality Standards & Designations									
Pollutants	Average Time	State Standards	State Attainment Status			Federal Standards	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	0.070 ppm*	N**	N**	U**
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	None	--	--	--	35 ug/m ³	N	U	U
	Annual	12 ug/m ³	A	U	A	12 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 ppm	U	U	U
	Annual	0.030 ppm	A	A	A	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)	A	A	A
	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

*U.S. EPA revised the 8-hour ozone standard from 0.075 to 0.070 ppm on October 1, 2015.

**The attainment status is based on the 2008 8-hour ozone standard (0.075 ppm).

Attainment status: A= Attainment, N=Non-Attainment, U=Unclassified

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The Sacramento area was designated as nonattainment for the federal 24-hour PM_{2.5} standard in 2009. Because of regional collaborative efforts, the Sacramento area's local air districts were able to submit a clean data finding report to the U.S. EPA in May 2012, and were issued an attainment determination by U.S. EPA for the Sacramento PM_{2.5} nonattainment area in 2013.

According to the attainment determination made by U.S. EPA in 2013, the Sacramento area should submit the formal area redesignation request and implementation/maintenance plan to U.S. EPA for final approval. This plan is different than the Sacramento Regional Ozone SIP. It requests the U.S. EPA to redesignate the Sacramento federal PM_{2.5} nonattainment area as attainment based on the clean data verification and provides the demonstration that the Sacramento area will continue to maintain the attainment status for next 10 years.

The draft implementation/maintenance plan was approved by each air district within the Sacramento area in 2014. However, the U.S. EPA suspended the review of the locally approved plan due to a unique weather pattern which occurred in December 2013 that resulted in increased PM_{2.5} readings at various monitoring stations within the nonattainment area. Currently, the local air districts are working with CARB to revise the existing



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implementation/maintenance plan based on the latest 3 year PM_{2.5} monitoring data from the region.

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More information regarding the federal and state ambient air quality standards, air monitoring data in California, area designation, and regional air quality plans can be found at the following websites:

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- ✓ The most current state and federal air quality standards are available at: <http://www.arb.ca.gov/research/aqgs/aqgs2.pdf> (updated 5/4/16).
- ✓ The current area designations for the federal and state ambient air quality standards are available at: <https://www.arb.ca.gov/desig/adm/adm.htm>.
- ✓ CARB's AQMIS (Air Quality and Meteorological Information System) for air monitoring data is available at: <https://www.arb.ca.gov/aqmis2/aqmis2.php>.
- ✓ CARB iADAM: air quality statistics are available at: <https://www.arb.ca.gov/adam/index.html>.
- ✓ More information regarding the Sacramento Regional Air Quality Plan can be found at: <http://www.airquality.org/air-quality-health/air-quality-plans/federal-planning>

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1.3. The Role of the District in CEQA

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The District is responsible for improving air quality within Placer County by assisting lead agencies in the review of land development proposals which have the potential to result in direct or indirect adverse air quality impacts and are subject to CEQA. Air quality impacts, from vehicle and fuel combustion activities, could potentially result in substantial air pollutant emissions which would hinder the District's efforts in attaining and maintaining the Federal and State ambient air quality standards. Other air quality impacts, such as those associated with greenhouse gases, odors, and special health related impacts, are also considered during the environmental review process for a project.



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As a commenting agency, the District receives environmental documents such as Notice of Preparation (NOP), Mitigated Negative Declaration (MND), Draft Environmental Impact Report (DEIR), or Final Environmental Impact Report (FEIR) prepared by lead agencies for land use projects. The District reviews and, when necessary, comments on these environmental documents, regarding the analysis and discussion related to potential air quality impacts from land use projects. If requested by the lead agency, the District may also provide informal comments on an Administrative Draft Environmental Impact Report (ADEIR). This Handbook's primary focus is on the District's role as a commenting agency for land use projects.

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In addition to being a commenting agency, the District may act as a responsible agency when a project or a portion of a project is required to obtain an operating permit from the District. For example, if a proposed discount superstore has a gasoline service station as part of the proposal, an Authority to Construct/Permit to Operate would be required by the District; thus the District would then be considered a responsible agency during the review process.

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Although rare, in some cases the District may act as a lead agency. The District may decide to change its CEQA role from a responsible agency to a lead agency if (1) the primary lead agency fails to prepare an environmental analysis for air quality impacts as required under CEQA, (2) the District determines that a subsequent EIR is required to further evaluate the

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project's related air quality impacts, (3) the District determines that the air quality impacts' conclusion written for an adopted/certified environmental document was inadequate, or (4) if a Special District or City or County agree that the District should be the primary lead agency for a particular project.

It is important to note that when the District acts as a commenting agency, the District's 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.

1.4. Early Consultation

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



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

- Special land use and design features that could provide alternatives to motor vehicles, fuel consumption, as well as energy conservation to reduce project related emissions;
- Land use zoning conflicts and exposure of sensitive receptors to odors, toxics and criteria pollutants;
- Permit requirements from applicable federal, state and special districts, including potentially the District itself; and
- Special analysis needed to identify feasible mitigation.

1.5. Preferred Project Information Needed for District Review

Early consultation with the District can ensure that the CEQA document adequately addresses air quality issues. In order to facilitate the District's review of the proposed project, the following information should be provided:

- Detailed project description;
- Written document such as an air impact analysis report or a chapter of air quality impacts within the environmental document;
- Modeling outputs if available, for both construction and operational phase emissions (criteria pollutants and greenhouse gas (GHG)) with different seasons (summer, winter, and annual);
- List of mitigation measures proposed by the project;

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- Any relevant environmental documents previously associated with a project, including any previously prepared Initial Studies, NDs, MNDs, EIRs, etc.; and
- 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.

1.6. Types of Projects Generally Subject to Air Quality Analysis

The lead agency can forward any project which is subject to CEQA to the District for review. In general, it is recommended that any proposed project which would result in **short-term construction and/or long-term operational criteria pollutants and GHG emissions**, as discussed in this Handbook, be submitted to the District for review. The District will assist the lead agency to prepare the appropriate analysis in order to determine the level of significance on air quality impacts, and recommend feasible mitigation measures if needed.

- ✓ See [CHAPTER 2](#) for further detail on significance thresholds.
- ✓ See [CHAPTER 3](#) for further detail on construction emissions.
- ✓ See [CHAPTER 4](#) for further detail on operational criteria pollutant emissions.
- ✓ See [CHAPTER 5](#) for further detail on operational GHG emissions.
- ✓ See [CHAPTER 6](#) for further detail on special concerns.

Types of projects generally subject to Air Quality Analysis include:

- General Plan Updates and Amendments
- 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

1.7. District Process in Reviewing a Project

The vast majority of CEQA documents that are reviewed by the District staff are done under the District's role as a "commenting agency". Figure 1-3 shows the steps summarizing the District's internal process 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: Reviewing Project Information

When the District receives an environmental document or an application forwarded by the lead agency for a proposed project, the District starts with an evaluation of it for potential air quality impacts. Potential impacts that should be considered during the initial review typically include summarizing existing air quality conditions and regulatory requirements within the planning area, identifying emission sources associated with the project, and/or

verifying any potential conflicting neighboring land uses. The initial review will also consider all phases of project planning, construction and operational impacts, as well as cumulative impacts.

Step 2: Evaluating Air Quality Analysis

An air quality analysis for a project, which uses the project's specific data and appropriate computer model, is the key foundation in identifying the project's related air quality impacts and in determining the impact conclusions. When there is the potential for a proposed project to generate substantial amounts of criteria pollutants emissions, a computer model can be used to estimate the project's related air pollutant emissions. District staff reviews the modeling results, provided by the lead agency, to verify that the project's air quality impacts analysis has been done appropriately.

When reviewing the project's modeling results, District staff evaluate the associated sections or chapters of the environmental document (e.g., project description, land use, traffic analysis, and utility usage projection) to verify if the appropriate modeling settings are consistent with the project's proposals and modeling results along with any environmental conclusions that are based on those results. District staff also verify that the modeling analysis has included all of the emission sources associated with the project, the feasible mitigation measures for the project, and the neighboring land uses which should be considered. In some cases, District staff may, at their discretion, prepare an internal modeling analysis, for the project under review, to further assist in refining the analysis provided from the lead agency.

If the preliminary information received from the lead agency is not complete or not sufficient to evaluate the project's air quality 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 review the project. In such cases, the District may notate this in their comments on the project.

Please note that District staff recommend that consultants contact the District in advance regarding the special model setting requirements and assumptions used for their project's air quality impact analysis.

Step 3: Analyzing Air Quality Impacts

Air pollutant emissions from the modeling results are compared to the thresholds of significance, selected by the lead agency, to determine the significance for project related construction, operational, and cumulative impacts of criteria pollutants as well as GHG impacts. Since the District's Board adopted the CEQA significance thresholds for criteria pollutants and GHG in October 2016, the District recommends that lead agencies, within Placer County, consider using the adopted significance thresholds for new projects subject to CEQA. The District also recognizes that any thresholds adopted and used by a lead agency pursuant to CEQA Section 15064.7 (b)(c) can be used to determine the project's air

What information should be included in a modeling analysis?

A modeling analysis for a project should be based on the project's specific information including, but not limited to:

- Proposed location and special project design features;
- Proposed timeframes for construction and operation;
- Reasonable modeling 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).

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quality impacts. For more information and discussion on the District's significance thresholds, please see [CHAPTER 2](#).

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The District recommends against using any measures that are implemented to comply with federal, state, and the District's rules and regulations as mitigation measures to mitigate the project's air quality impacts. Federal, state, and the District's regulatory compliance should be part of the project's baseline conditions to determine the project's related emissions before mitigation. It is at the lead agency's discretion as to whether that the local jurisdiction's rules and regulations are reflected within the project's related emissions, either before or after mitigation, in the modeling analysis results. [APPENDIX A](#) summarizes the District's rules and regulations which may be applied to the land use projects.

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If the modeling results from an appropriately conducted analysis show that the project-related emissions after regulatory compliance will be less than the significance 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 that the project-related emissions would exceed the thresholds, the project related air quality impacts may be potentially significant and mitigation measures should be implemented to mitigate air quality impacts.

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Step 4: Identifying Mitigation Measures

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Mitigation measures should be proposed when project related emissions are determined to exceed the significance thresholds. Proposed mitigation measures will be evaluated to determine if the project related emissions can be mitigated to below the significance thresholds. The District may assist the lead agency in evaluating if the proposed mitigation is sufficient enough to demonstrate that the project related emissions can be mitigated below the significance thresholds. If it appears that the proposed mitigation is not sufficient to mitigate the emissions below the significance thresholds, the District will recommend to the lead agency the identification of additional on-site measures, or participation in the District's Off-Site Mitigation Program. More information on the District's Off-Site Mitigation Program can be found at the District website.

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- ✓ PCAPCD Off-site Mitigation Program. <http://www.placerair.org/landuseandceqa>

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NOTE: When identifying mitigation measures, it is the District's recommendation that the lead agency should consider **all feasible on-site measures** first, then the off-site mitigation measures if there are insufficient feasible on-site mitigation measures to mitigate the project's related air quality impacts to the less-than-significant level.

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- ✓ See [APPENDIX C](#) for construction mitigation measures;
- ✓ See [APPENDIX E](#) for criteria pollutant operational mitigation measures; and
- ✓ See [APPENDIX F](#) for GHG operational mitigation measures.

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Step 5: Preparing District's Response

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After the review, District staff may provide a comment letter to the lead agency. The letter will summarize the District's findings, issues found, and any recommendations regarding the air quality analysis, conclusion determination, or mitigation measure identification. This may assist the lead agency in refining its air quality impact analysis or identifying further reductions of potential air quality impacts associated with a project.

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Please note that the District may not respond to every application received from the lead agency if the District has no comment on the application. Many times, the District may have no comment on an application when it is determined as "Categorically Exempt" by the lead agency or an application for minor use permit, variance, and design review.

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1.8. Additional Analysis in Environmental Documents

Additional analyses may be recommended by the District when the proposed project may result in potential special impacts and need further evaluation. More detailed discussion for the analyses of special project impacts can be found in [CHAPTER 6](#).

Depending on the proposed project, stationary source(s) may be included in which the associated emissions should be estimated. The most appropriate emission factors should be used to calculate the potential emissions from the proposed stationary sources. U.S. EPA document AP-42 "[Compilation of Air Pollutant Emission Factors](#)" would be one of the reference sources for emission factors. If there is an existing stationary source involved, please contact the District for the current permit requirements. Please note that the emission calculation for the existing stationary source should be the actual emissions, not the potential maximum emissions on permits.

A project with the potential to emit toxic or hazardous air pollutants, including diesel exhaust, and that would be located in close proximity to sensitive receptors, may result in potential health impacts due to an increase of toxic emissions which could raise the cancer and acute non-cancer risk on the affected population, even at very low levels of emissions. Such projects will have recommendation to prepare a health 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 HSC Section 42301.6 (AB 3205) and Public Resources Code Section 21151.8, subd. (a)(2), any new school site or any proposed industrial or commercial project site located within 1000 feet of a school should be referred to the District for review.

CARB has developed an [Air Quality and Land Use Handbook](#) which provides recommendations regarding the siting of new land uses involving sensitive receptors/groups¹⁰ near freeways, distribution centers, rail yards, ports, refineries, chrome plating facilities, dry cleaners, and gasoline dispensing facilities¹¹. These sources may raise the health risk on proposed sensitive receptors to an unacceptable level due to their toxic air contaminants emissions. If a proposed project is located in close proximity to any of these sources, a health risk screening and/or assessment should be performed to assess the potential risk on sensitive receptors within the development. The California Air Pollution Control Officers Association (CAPCOA) developed a [Health Risk Assessments for Proposed Land Use Projects Guidance](#) to assist lead agencies in assessing the health impacts of toxic contaminants. To further address and reduce the air pollution impacts from nearby roadways, CARB released a [Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways Guide](#) to provide mitigation strategies that land use planners can use to provide guidance on protecting public health in developments when they are close to freeways.

- ✓ [CARB Air Quality and Land Use Handbook](#)
- ✓ [CAPCOA Health Risk Assessment Guidance](#)
- ✓ [CARB Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways Guide](#)

Naturally-occurring asbestos (NOA), is often found in ultramafic or serpentine rock formations, and is present in several foothill areas of Placer County. When this material is disturbed asbestos fibers may be released, becoming airborne, and thereby creating a potential health hazard. The project should identify, in the environmental document, if it is located in areas where ultramafic or serpentine rock formations are most likely found. District NOA maps show where ultramafic or

¹⁰ <https://www3.epa.gov/region1/eco/uep/sensitivereceptors.html>

¹¹ Please see CARB Air Quality and Land Use Handbook Table 1-1 on page 4. <https://www.arb.ca.gov/ch/handbook.pdf>

PM₁₀
CO₂
ROG
O₃
SF₆
NO_x
CO₂E
CH₄
N₂O
H₂O
CH₄
HFC
ROG
O₃
CO₂
ROG
SF₆
NO_x
SF₆
NO_x
CO₂E
CH₄
PM₁₀
O₃
SF₆
SF₆
NO_x

PM₁₀
CO₂
ROG
O₃
SF₆
NO_x
CO₂E
CH₄
N₂O
H₂O
CH₄
HFC
ROG
O₃
SF₆
NO_x
SF₆
NO_x
CO₂E
CH₄
PM₁₀
CO₂
ROG
O₃
SF₆

serpentine rock formations could be found in Placer County. A Naturally-Occurring Asbestos Dust Mitigation Plan (ADMP) will need to be developed to comply with the requirements listed in the CARB's Asbestos Air Toxic Control Measure (ATCM) for Construction, Grading, Quarrying, and Surface Mining Operations if the project is located in a map area where NOA is most likely to be found or if ultramafic rock or serpentine rock are found on the project site. The ADMP guidance can be reviewed on the District's website.

- ✓ [Placer NOA Maps](#)
- ✓ [Placer ADMP guidance](#)
- ✓ [CARB Asbestos ATCM](#)

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 air quality impacts associated with 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 in the DEIR. The District recommends that the EIR consultant contact District staff if additional information or guidance is needed.

1.9. Use of a Previously Certified EIR

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 project."¹² If a project is tiering the previous certified EIR, the lead agency should require the project to implement mitigation measures which were identified by the previous certified EIR in order to mitigate air quality impacts. However, the previous certified EIR could be outdated due to the time lag between its environmental analysis and newer more restrictive ambient air quality standards as well as emission analysis model updates. Mitigation measures initially identified in the previous certified EIR may be outdated or infeasible making them insufficient to offset the project's related air quality impacts in today's environment. If that is the case, an addendum, supplement or subsequent environmental document should be required for the new project to satisfy CEQA¹³.

The District will assist lead agencies in reviewing the projects that propose tiering of a previously certified EIR to determine whether or not the previously certified EIR adequately addresses all pertinent air quality issues.

1.10. Baseline Considerations

The Baseline is one of the elements for evaluating a project under CEQA. Although there is no precise definition in statute or guidelines, the description of the "Environmental Setting" under the CEQA Guidelines could be used as guidance on how to determine the baseline for a project: "An EIR must include 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

¹² CEQA Guidelines §15152
¹³ CEQA Guidelines §15152 (f)

notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective.¹⁴

The District recommends that the “physical environmental conditions” for a land use project should be considered whether or not there is an existing activity/operation which occurred on the planning area that generated air pollution. For example, a hotel innovation project may involve a boiler or generator which are currently operated by the hotel. Its operation will be considered as the existing physical conditions for the proposed project. Another case could be an amendment of a specific plan or general plan that has the vehicle miles traveled (VMT) from existing residential and commercial activities. The VMT from the existing motor vehicle operation is considered with the physical conditions for the proposed amendment. Several court cases with various opinions have made this topic complicated. The District is available to assist lead agencies to identify the appropriate baseline for the project's related air quality impact determination.

¹⁴ CEQA Guidelines §15125 (a)

PM₁₀
CO₂
ROG
O₃
SF₆
NO_x
CO₂E
CH₄
N₂O
H₂O
CH₄
HFC
ROG
O₃
CO₂
ROG
SF₆
NO_x
SF₆
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CO₂E
CH₄
PM₁₀
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