

# **APPENDIX FEIR-2**

**Supplemental Information - provided  
to CREED LA in response to requests  
for reference documents.**

## **DETERMINING THE AIR QUALITY SIGNIFICANCE OF A PROJECT**

### **CHAPTER 6**

Section 15002(g) of the state CEQA Guidelines defines a significant effect on the environment as "a substantial adverse change in the physical condition which exists in the area affected by the proposed project." Further, the project is considered to be of statewide, regional, or area-wide significance if it, for example, interferes with attaining the federal or state air quality standards (CEQA Guidelines Section 15206(b)(2)). To determine the significance of a project, CEQA requires the preparation of an Initial Study by the project proponent or lead agency. The Initial Study will evaluate the impact of the proposed project upon the environment, including air quality. From an air quality perspective, the impact of the project is determined by examining the types and levels of emissions generated by the project and its impact on factors that affect air quality. As such, projects should be evaluated in terms of air pollution thresholds established by the District. The thresholds of significance differ for the SCAB and the Coachella Valley. The scope of the evaluation and the extent of the required CEQA review will depend upon the estimated extent of the impact as determined by the lead agency in the Initial Study.

#### **6.1 Preparing the Initial Study**

To assist local planners and project proponents in answering the questions in the Initial Study, and thereby determining the air quality significance of a project, the key air quality issues to consider in each Initial Study category are summarized in Table 6-1.

Beyond the obvious primary impact of specific emissions arising from the operation and construction of a project, there is the potential for secondary effects. Secondary effects include such things as: impacts on the earth, water, population, transportation/circulation, energy/utilities, human health, and public services, that affect air quality indirectly. Among these secondary effects are, for example, high CO emissions from degradation in roadway level of service and NOx from power plants producing energy. All of those emissions contribute to air pollution, and need to be included in the project's emissions calculations. CEQA requires that in evaluating the significance of the environmental effect of a project, the lead agency shall consider both primary or direct and secondary or indirect consequences (CEQA Guidelines Section 15064 (d)). The impact of a project needs to be evaluated in terms of emission thresholds and other indicators of potential air quality impacts.

#### **6.2 SCAB Air Pollution Thresholds for Operations**

As seen above, new and modified projects will affect regional air quality both directly and indirectly. To determine the extent of a proposed project's environmental impact and the significance of such impact the project should be compared to established levels of significance. The District has established two types of air pollution thresholds to assist lead agencies in determining whether or not the operation phase of a project is significant. These can be found in the following sections under: 1) emission thresholds; and 2) additional indicators. If the lead agency finds that the operational phase of a project has the potential to exceed either of the air pollution thresholds, the project should be considered significant.

##### **o Emission Significance Thresholds (Primary Effects)**

The District has established these thresholds, in part, based on Section 182 (e) of the federal Clean Air Act which identifies ten tons a year of volatile organic gases as the significance level for stationary sources of emissions in extreme non-attainment areas for ozone. The South Coast Air Basin is the only extreme non-attainment area in the United States. This emission threshold has been converted to a pounds per day threshold for the operational phase of a project. The District staff also evaluated the thresholds established by other air quality management agencies in California and has taken into account the effect the thresholds would have on local governments' work load.

While Section 15064 (b) of CEQA Guidelines states that an ironclad definition of a significant effect is not possible because the significance of an activity may vary with the setting, the District believes that the setting as referred to in CEQA can be defined in this case. Under California state law (Health and Safety Code Section 40402), the South Coast Air Basin is defined as a distinct geographic area with a critical air pollution problem for which ambient air quality standards have been promulgated to protect public health. As such, the District believes that significance thresholds can be established based on scientific and factual data that is contained in the federal and state Clean Air Acts. Therefore, the District recommends that these thresholds be used by lead agencies in making a determination of significance. However, the final determination of whether or not a project is significant is within the purview of the lead agency pursuant to Section 15064 (b) of the CEQA Guidelines.

Both direct and indirect emissions should be included when determining whether the project exceeds these thresholds. The following significance thresholds for air quality have been established by the District for project operations:

**55 pounds per day of ROC**

**55 pounds per day of NO<sub>x</sub>**

**550 pounds per day of CO**

**150 pounds per day of PM<sub>10</sub>**

**150 pounds per day of SO<sub>x</sub>**

**Ca. state 1-hour or 8-hour CO standard**

**Projects in the South Coast Air Basin (SCAB) with daily operation-related emissions that exceed any of the above emission thresholds should be considered to be significant.**

Planners and project proponents may determine if a project is likely to be significant by screening the project using Table 6-2. The land uses listed therein are based on the mobile source emissions from projects that have the potential to exceed the emission thresholds. Table 6-2 does not cover all proposed projects or situations. If site-specific information is available, the MAAQI model or emission calculation procedures discussed in Chapter 9 of this Handbook can be used to estimate emissions totals to determine significance. Any emission reductions resulting from existing rules and ordinances should be calculated as the project's non-mitigated emissions and discussed in the project description.

In addition, level of service can be used as a screening method for determining when vehicle trips will impact a roadway, thus violating the state 1-hour or 8-hour standard, and creating a CO hotspot. Refer to Section 9.4.

**o Additional Indicators of Potential Air Quality Impacts (Secondary Effects)**

Additional indicators should be used as screening criteria indicating the need for further analysis with respect to air quality. Whenever possible, the project should be evaluated in a quantitative analysis; otherwise a qualitative analysis is appropriate. The additional indicators are as follows:

- o Project could interfere with the attainment of the federal or state ambient air quality standards by either violating or contributing to an existing or projected air quality violation (refer to Chapter 12 and Appendix G, Significant Effects, State CEQA Guidelines);**
- o Project could result in population increases within the regional statistical area which would be in excess of that projected in the AQMP and in other than planned locations for the project's build-out year (refer to Chapter 12);**
- o Project could generate vehicle trips that cause a CO hot spot (refer to Section 9.4);**

Weekend Trip Generation Rates\*

ITE Land Use Code	Land Use	Saturday Rates	Sunday Rates
220	Multifamily Housing	8.14 trips/DU	6.28 trips/DU
710	General Office Building	2.21 trips/TSF	0.70 trips/TSF
932	High-Turnover (Sit-Down) Restaurant	122.40 trips/TSF	142.64 trips/TSF
820	Shopping Center	46.12 trips/TSF	21.10 trips/TSF

\* Does not include discounts for transit trips, internal capture or pass-by trips.

Source: Institute of Transportation Engineers (ITE) Trip Generation Manual 10<sup>th</sup> Edition. September 2017.