Technical Modeling Considerations For Criteria Pollutants And Human Health Effects

In their interim guidance addressing *Sierra Club v. County of Fresno* (6 Cal. 5th 502) (Friant Ranch), SMAQMD (2019) recommends lead agencies compare the air quality models used in CEQA analyses to those models designed to evaluate regional attainment with ambient air quality standards and associated human health consequences. This section describes the three models used to estimate criteria pollutant emissions generated by construction and operation of the project and evaluates their ability to assess specific health impacts of the project. This section also analyzes whether models and tools that have been developed to quantify ambient pollutant concentrations could be used to reasonably correlate project-level emissions to specific health consequences.

Review of Project Analysis Models

Criteria pollutant emissions generated by construction and operation of the project were estimated using the California Emissions Estimator Model (CalEEMod), SMAQMD's Roadway Construction Emissions Model (RCEM), and the California Air Resources Board's (CARB) EMissions FACtor (EMFAC) model. Each of the following sections note whether the given model is suitable for quantify human health consequences or changes in nonattainment days.

California Emissions Estimator Model

CalEEMod is a statewide computer model quantifies construction and operational criteria pollutant and greenhouse gas (GHG) emissions from land use development projects. The model evaluates construction emissions associated with six phases—demolition, site preparation, grading, building construction, architectural coatings, and paving. Emission sources considered by the model include offroad construction equipment, onroad mobile vehicles, fugitive dust from land disturbance, and volatile organic compounds from architectural coatings and paving activities.

CalEEMod quantifies project emissions based on user-defined inputs for project location, operational year, land use type (e.g., commercial), climate zone, and size. Based on these minimum data inputs, users can estimate construction emissions-based model generated default assumptions for construction phasing, construction equipment inventory and activities, and trip lengths. Default values included in the model were provided by California air districts and account for local conditions and regulations. Where appropriate, CalEEMod combines local data with regional and statewide values to ensure enough information is available to quantify emissions. Users can override default values with project-specific information. In addition, users can implement mitigation measures and strategies to reduce construction-related exhaust and fugitive dust emissions.

Based on the user inputs and emission factors from the CARB's EMFAC and OFFROAD models, CalEEMod calculates both daily maximum (pounds per day) and annual average (tons per year) emissions. These emissions can be compared to air district mass emission thresholds, such as those adopted by EDCAQMD. CalEEMod does not quantify concentrations of the various air pollutants (in terms of micrograms per cubic meter or parts per million), nor does it estimate secondary pollutants (such as ozone and PM2.5) or potential human health effects from exposure to criteria pollutants. Accordingly, CalEEMod cannot be used to evaluate changes in the number of regional nonattainment days or correlate project-level emissions to specific health consequences.

Road Construction Emissions Model

SMAQMD's RCEM is a public-domain spreadsheet model formatted as a series of individual worksheets. The model is specifically designed to evaluate construction criteria pollutant and GHG emissions from linear projects (e.g., water infrastructure, roads). Four generic construction phases are considered by the model: 1) grubbing/land clearing, 2) grading/excavation, 3) drainage/utilities/subgrade, and 4) paving. Within these phases, the model estimates construction emissions for load hauling (onroad heavy-duty vehicle trips), worker commutes, construction site fugitive dust, and offroad construction vehicles. Although exhaust emissions are estimated for each activity, fugitive dust estimates are currently limited to major dust-generating activities, which include grubbing/land clearing and grading/excavation.

The RCEM was designed to enable users to estimate emissions using a minimum amount of project-specific information, such as construction start year and duration, project type, and the project length and area. This was done because specific data to quantify emissions from transportation projects is often unavailable when the environmental document is being prepared. To help facilitate the quantification of construction emissions based on valid assumptions, the RCEM contains default data based on surveys of construction equipment , schedules, and other construction data from a selection of construction projects in Sacramento County, as well as construction surveys conducted for CalEEMod and a technical evaluation completed by the University of California, Davis. Emission factors used by the model are from the CARB's EMFAC and OFFROAD models.

Like CalEEMod, RCEM calculates both daily maximum (pounds per day) and annual average (tons per year) emissions. RCEM does not quantify concentrations of the various air pollutants (in terms of micrograms per cubic meter or parts per million), nor does it estimate secondary pollutants (such as ozone and PM2.5) or potential human health effects from exposure to criteria pollutants. Accordingly, RCEM cannot be used to evaluate changes in the number of regional nonattainment days or correlate project-level emissions to specific health consequences.

EMissions FACtor Model

CARB developed the EMFAC model to facilitate preparation of statewide and regional mobile source emissions inventories. The model generates criteria pollutant and GHG emissions rates that can be multiplied by vehicle activity data from all motor vehicles, including passenger cars to heavy-duty trucks, operating on highways, freeways, and local roads in California. The resulting emissions estimates are mass emission quantities that can be expressed in terms of pounds per day and tons per year (or other similar unit rates). Like CalEEMod and RCEM, EMFAC does not assess pollutant dispersion or quantify concentrations or potential health effects. Accordingly, EMFAC cannot be used to evaluate changes in the number of regional nonattainment days or correlate project-level emissions to specific health consequences.

Review of Photochemical and Human Health Models

Several models and tools capable of translating mass emissions of criteria pollutants to ambient pollutant concentrations and various health endpoints have been developed. Table 1 summarizes key tools, identifies the analyzed pollutants, describes their intended application and resolution, and analyzes whether they could be used to reasonably correlate project-level emissions to specific health consequences.

As shown in Table 1, almost all tools were designed to be used at the national, state, regional, and/or city-levels. This is because criteria pollutants emitted by a specific source often do not deposit immediately adjacent to that source. Pollutants can be transported by prevailing winds or transformed through chemical reactions and physical interactions with other pollutants in the atmosphere. Because some pollutants can be transported over long distances, recorded violations of the ambient air quality standards at a specific monitoring station and resultant health effects experienced by the local population may be the result of faraway emission sources (some of which may not even be located within the same air basin). For this reason, attaining the ambient air quality standards and protecting human health from exposure to criteria pollutants requires a regional, and sometimes multiregional strategy that considers the combined effect of all emission-generating sources that influence air quality within an air basin.

The models and tools that have been developed to assess attainment of the ambient air quality standards and human health effects are therefore regional in nature and are not well suited to analyze small or localized changes in pollutant concentrations associated with individual projects. Said another way, "it remains impossible, using today's models, to correlate that increase in concentration to a specific health impact [because] such models are designed to determine regional, population-wide health impacts, and simply are not accurate when applied at the local level" (San Joaquin Valley Air Pollution Control District 2015). As of the writing of this analysis "neither the Sac Metro Air District nor any other air district currently have methodologies that would provide Lead Agencies and CEQA practitioners with a consistent, reliable, and meaningful analysis to correlate specific health impacts that may result from a proposed project's mass emissions" (Sacramento Metropolitan Air Quality Management District 2019).

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Table 1. Analysis of Photochemical and Human Health Models					
Tool	**Created by**	**Description**	**Resolution**	**Pollutants Analyzed**	**Project-Level CEQA Applicability**
AirCounts	Abt Assoc.	Online tool that helps large and medium-sized cities quickly estimate the health benefits of PM2.5 emission reductions and economic value of those benefits. The tool estimates the number of deaths (mortality) avoided and economic value related to user-specified regional, annual PM2.5 emissions reduction. The modeling year is 2010; avoided deaths are expected to occur over a 20-year period and their present value is shown in 2010 US dollars at a 3% discount rate.	City-level	Primary	This tool is only illustrative, as it is limited to certain cities and does not target specific sectors. Given that it was designed as a screening-level tool, is not sector specific, and includes limited California data, the tool is **not recommended** for project-level CEQA analysis.
AP2 (formerly Air Pollution Emission Experiments and Policy [APEEP])	Mueller and Mendelsohn, 2006	AP2 is an integrated assessment model developed to assess marginal damage impacts from emissions at the national scale but can be applied at the county-level. The model connects emissions to monetary damages through six modules: emissions (per EPA's national inventory), air quality modeling, concentrations, exposures, physical effects, and valuation. Damages are presented on a dollar-per-ton basis. Model extends damage assessment beyond human health, and includes assessment on reduced crop and timber yields, reductions in visibility, enhanced depreciation of man- made materials and damages due to lost recreation services.	National or county-level	SO2, ROG, NOx, ozone, PM2.5, PM10	The model operates at the national scale but may be applied at the county-level (although it is not clear how this adjustment should be made). The tool is also not commercially available. Accordingly, the tool is **not recommended** for project-level CEQA analysis.
Methodology for Estimating Premature Deaths Associated with Long-Term Exposure to Fine	CARB	The staff report identifies a relative risk of premature death associated with PM2.5 exposure based on a review of all relevant scientific literature, and a new relative risk factor was developed. This new factor is a 10% increase in risk of premature death per 10 µg/m3 increase in exposure to PM2.5 concentrations (uncertainty interval: 3% to 20%).	National	PM2.5, SO2, NOx, NH3, and ROG	The primary author of the CARB staff report notes that the analysis method is not suited for small projects and may yield unreliable results due to various uncertainties. Accordingly, the tool is **not recommended** for project-level CEQA analysis.

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Airborne Particulate Matter in California					
Co-Benefits Risk Assessment (COBRA)	US EPA	The staff report identifies a relative risk of premature death associated with PM2.5 exposure based on a review of all relevant scientific literature, and a new relative risk factor was developed. This new factor is a 10% increase in risk of premature death per 10 µg/m^3 increase in exposure to PM2.5 concentrations (uncertainty interval: 3% to 20%)	National	PM2.5, SO2, NOx, NH3, and ROG	The primary author of the CARB staff report notes that the analysis method is not suited for small projects and may yield unreliable results due to various uncertainties. Accordingly, the tool is **not recommended** for project-level CEQA analysis.
Environmental Benefits and Mapping Program-Community Edition (BenMAP-CE)	US EPA	Preliminary screening tool that contains baseline emission estimates of a variety of air pollutants for a single year (2017). COBRA is targeted to state and local governments as a screening assessment for clean energy policies. Users specify changes to the baseline emission estimates. COBRA then uses "canned" source-receptor matrix model to estimate PM changes and resulting health outcomes and monetized values. The results can be mapped to visually represent air quality, human health, and health-related economic benefits. Analysis can be performed across the 14 major emissions categories included in the EPA's National Emissions Inventory. Note that COBRA is based on EPA's BenMAP-CE (discussed in a separate entry).	National, County, City, and sub- regional levels	Ozone, PM, NO_2, SO_2, CO	The smallest default analysis resolution for BenMAP-CE is 144 square kilometers (equivalent to approximately 56 square miles or 36,000 acres). This tool could be used to derive average health incidence/ton estimates that can be used for illustrative purposes only for most projects with proper disclosure of the inherent inaccuracies involved in averaging. It is **not recommended** for individual modeling of smaller projects, however. The tool may be appropriate for modeling certain large-scale General Plan-level analyses.
Fast Scenario Screening Tool (TM5-FASST)	Joint Research Centre (Italy)	Tool allows users to evaluate how air pollutant emissions affect large scale pollutant concentrations and their impact on human health (mortality and years of life lost) and crop yield from national to regional air quality policies, such	Global and national- levels	PM2.5, ozone, NOx, NH3, CO, ROG, EC, CH4, SO2	This tool is applicable at national to global scales. Accordingly, the tool is **not recommended** for project-level CEQA analysis.

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		as climate policies. The tool is web-based and does not require coding or modelling. Users must gain access through publishers.			
Long-range Energy Alternatives Planning System--Integrated Benefits Calculator (LEAP-IBC)	Climate and Clean Air Coalition (CCAC)	Allows users to rapidly estimate the impacts of reducing emissions on health, climate, and agriculture. Tool uses sensitivity coefficients that link gridded emissions of air pollutants and precursors to health, climate and agricultural impacts at a national level. The sensitivity coefficients are generated by a chemical transport model, so air quality modeling not necessary. Tool is currently Excel-based and is available through the developers only. A web-based interface is currently under development.	National- level	Ozone, PM, air toxics, GHG	This tool is applicable at national scale. Accordingly, the tool is **not recommended** for project-level CEQA analysis.
Multi-Pollutant Evaluation Method (MPEM)	BAAQMD	Estimates the impacts of control measures on pollutant concentration, population exposures, and health outcomes for criteria, toxic, and GHG pollutants. Monetizes the value of total health benefits from reductions in PM2.5, ozone, and certain carcinogens, and the social value of GHG reductions. MPEM was designed for development of a Clean Air Plan for the San Francisco Bay Area. The inputs are specific to the SF region and are not appropriate for projects outside BAAQMD.	Regional level in the SFBAAB	Ozone, PM, air toxics, GHG	This tool is designed to support the BAAQMD in regional planning and emissions analysis within the SFBAAB. The model applies changes in pollutant concentrations over a four-square kilometer grid. This tool could be used to derive average health incidence/ton estimates that can be used for illustrative purposes only for most projects with proper disclosure of the inherent inaccuracies involved in averaging. It is **not recommended** for individual modeling of smaller projects, however. The tool may be appropriate for certain large-scale planning-level analyses in the SFBAAB (with permission of BAAQMD).
Response Surface Model (RSM)-based	US EPA	Consists of tables reporting the monetized PM2.5-related health benefits from reducing PM2.5 precursors from certain source types nationally	National or regional (San Joaquin County	EC, SOx, VOC, NH3, NOx	While RSM includes regional values specific to San Joaquin County, the metrics only reflect the benefits of reductions in exposure to ambient

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Benefit-per-Ton Estimates		and for 9 US cities/regions. Applying these estimates simply involves multiplying the emissions reduction by the relevant benefit per-ton metric. The resulting value is the PM mortality risk estimate at a 3% discount rate. Note that RSM is based on EPA's BenMAP-CE (discussed in a separate entry).	only) levels		PM alone and do not include the benefits of reductions in other pollutants. The values are also dated as new sector-based BPT values are more current. Accordingly, the tool is **not recommended** for project-level CEQA analysis (even in San Joaquin County).
Sector-based Benefit-per-Ton Estimates	US EPA	Two specific sets of BPT estimates for 17 key source categories are available. Both are a reduced-form approach based on BenMAP modeling. The first are based on Fann et al. (2012) values and available from EPA's website. The second is based on updated modeling from Fann et al. (2017) and available in a Technical Support Document (TSD) from EPA. Applying these factors involves multiplying the emissions reduction (in tons) by the relevant benefit (economic value) or incidence (rates of mortality and morbidity) per-ton metric. The resulting value is the economics, mortality, and morbidity of direct and indirect PM2.5 emissions. All values are based on a national-scale study. Local values are preferred, but not available from any existing reduced form model and use of reduced form estimates for another city is unlikely to provide a better-than-national value. Use of the current values from EPA's 2018 TSD represent the most current estimate of monetized or incidence risk. Values from Lepeule et al. (2012) represent the most current estimate of mortality.	National- scale	PM2.5, SO2, NOx	Due to the complex non-linear chemistry governing ozone formation, EPA was not able to derive ozone or secondary PM BPT values. The BPT estimates provide a rough order-of-magnitude analysis of health consequences from directly-emitted PM and precursors to PM (with no secondary formation). However, the multipliers do not account for project- specific characteristics, receptor locations, or local dispersion characteristics. The resultant health effects are therefore reflective of national averages and may not be exact when applied to the project-level. Accordingly, the tool is **not recommended** for project-level CEQA analysis. Nonetheless, the estimates can be used to present an informational and scaled health risk analysis of directly-emitted PM and precursors to PM (with no secondary formation).