



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

CEQA Guidelines & Thresholds Update

Air District Objectives

- Attain/maintain health-based State and federal ambient air quality standards
- Reduce local air pollution exposure in disproportionately impacted communities
- Ensure new development is on the pathway toward 2050 climate stabilization goal
- Support infill, transit-oriented development and affordable housing
- Complement other Air District, regional agency and local programs and efforts



Purpose of the Update

- Review the justification for the current thresholds of significance and update as needed:
 - Current GHGs thresholds are not based on climate stabilization goals
 - Recent court decisions (Newhall, Cleveland Natl Forest, etc.)
 - Updated ARB Scoping Plan
 - New ambient air quality standards and State legislation (SB32)
 - New health studies related to air pollution exposure
 - Reevaluate guidance on addressing local exposure
- Review and update current CEQA Guidelines:
 - Outdated references
 - Incorporate new analytical methods and planning tools
 - Update screening criteria based on new thresholds and or methodology



Key Considerations in Threshold Development

- Air pollution and GHG's are largely cumulative impacts
- Need to identify emission levels for which a projects' individual emissions would be cumulatively considerable
- Criteria pollutant thresholds based on attaining and maintaining the NAAQs and CAAQs
- Consistency with Statewide plans
- Pathway to 2050 climate stabilization



Current CEQA Thresholds – Criteria Pollutants

PROJECT LEVEL

Pollutant	Construction-Related	Operational-Related	
	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tpy)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀ (exhaust)	82	82	15
PM _{2.5} (exhaust)	54	54	10
PM ₁₀ /PM _{2.5} (fugitive dust)	Best Management Practices	None	None
Local CO	None	9.0 ppm (8-hr avg), 20.0 ppm (1-hr avg)	

PLAN LEVEL: Consistency with Current AQ Plan control measures; and Projected VMT or vehicle trip increase is \leq projected population increase.

PLAN LEVEL (Transportation and Air Quality Plans): No net increase.



Current CEQA Thresholds - Local Exposure

**Risks and Hazards
For new sources and
receptors**
(Individual Project)

Compliance with Qualified Risk Reduction Plan
OR
Increased cancer risk of >10.0 in a million
Increased non-cancer risk of > 1.0 Hazard Index (Chronic or
Acute)
Ambient PM_{2.5} increase: > 0.3 µg/m³ annual average
Zone of Influence: 1,000-foot radius from property line of
source or receptor

**Risks and Hazards
For new sources or
receptors**
(Cumulative Threshold)

Compliance with Qualified Risk Reduction Plan
OR
Cancer: > 100 in a million (from all local sources)
Non-cancer: > 10.0 Hazard Index (from all local sources)
(Chronic)
PM_{2.5}: > 0.8 µg/m³ annual average (from all local sources)
Zone of Influence: 1,000-foot radius from property line of
source or receptor



Current CEQA Thresholds - GHG's

Consistency with a
Qualified Greenhouse Gas Reduction Strategy

– OR –

1,100 $\text{MTCO}_{2e}/\text{Year}$

– OR –

4.6 $\text{MTCO}_{2e}/\text{Service Population}/\text{Year}$
(6.6 $\text{MTCO}_{2e}/\text{SP}/\text{year}$ for Plans)



2017 Update - GHG Threshold Development

- GHG thresholds based on 2050 goal
- Air District Resolution for achieving 2050 Statewide climate stabilization goals
- Recent Court Decisions
- SB 32 established a Statewide 2030 target of 40% below 1990 levels
- EO S-3-05 set target of 80% below 1990 by 2050 levels to attain climate stabilization
- Updated Scoping Plan



2017 Update – Criteria Pollutant Threshold Development

- Bay Area in nonattainment with state and federal ozone and PM_{2.5} ambient air quality standards
- Federal ozone standard revised in 2015
 - 0.075 ppm → 0.070 ppm
- Federal PM_{2.5} standard revised in 2012
 - 15 micrograms/m³ → 12.0 micrograms/m³
- Review thresholds in light of more stringent air quality standards, and increased temperatures from climate change



2017 Update – Local Exposure Threshold Development

- Supreme Court opinion on addressing localized exposure to air pollution
- Identify a methodology for determining whether a project's incremental contribution becomes significant
- Review thresholds in light of updated OEHHA standards, new PM2.5 health studies
- Outside of CEQA, encourage other ways to address this issue, e.g., local plans and ordinances (ex: City of San Francisco's Article 38)



Next Steps

- Draft potential threshold options
- Ongoing outreach and input
- Release public draft of updated Thresholds and Guidelines
- Public workshops
- Air District Board Hearing



Questions

- *How have our current thresholds worked in your community?*
- *Do you prefer a numeric GHG threshold, similar to our service population or bright line?*
- *What are your thoughts on a “best management practices” threshold (i.e. implementation of best practices = less than significant)?*
- *Should the GHG threshold be based on 2030 or 2050?*
- *Have you seen or used any GHG thresholds not based on 2020?*
- *Is consistency with a local Climate Action Plan or General Plan preferred?*
- *Do you have any threshold options/methodologies that you recommend or would like to see BAAQMD evaluate?*
- *Have you found instances where our thresholds don't work (for example, with a data center or religious institution)?*



Thank you!

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