

Cumulative Impacts from Air Toxics for CEQA Projects Working Group Meeting #1

02/17/2022

10:00 AM (PST)

South Coast Air Quality Management District
Diamond Bar, California

Join Zoom Webinar Meeting - from PC or Laptop

<https://scaqmd.zoom.us/j/94556369595>

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Presentation Agenda

- I. Meeting Overview and Objective
- II. Background
- III. Overview of Development Process and a Phased Approach for Discussion
- IV. Feedback & Questions
- V. Next Steps
- VI. Staff Contacts

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Meeting Overview and Objective

- CEQA requires analysis of cumulative impacts and identifies what a discussion of cumulative impacts should include
- South Coast AQMD staff has previously provided guidance on how to prepare a cumulative impact analysis for air quality impacts for CEQA projects
- Staff has identified a need to provide additional guidance on cumulative impact analysis from air toxics for CEQA projects
- Staff is initiating a public process for the development of additional guidance and is seeking feedback on a phased approach to enhance cumulative air toxics analysis under CEQA and other potential approaches

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Defining Cumulative Impacts Under CEQA

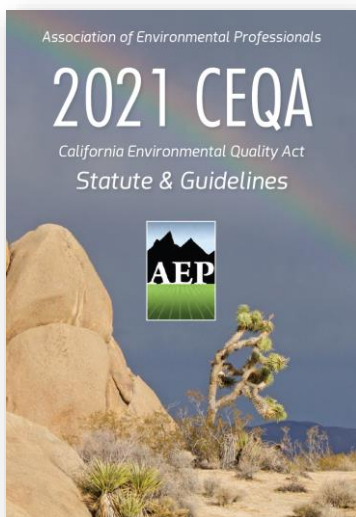


Image: Association of Environmental Professionals. Accessed at: <https://www.califaep.org/>

CEQA requires analysis of a project's direct, indirect, and cumulative environmental effects (CEQA Guidelines Section 15126.2)

A cumulative impact is defined as "...[t]wo or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355)

Cumulative impacts are created when the impact from the project being evaluated is considered with other projects causing related impacts

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CEQA Requirements for Discussion of Cumulative Impacts

List of past, present, and probable future projects; consider factors such as the nature of each environmental resource being examined, location, and project type.

OR

Summary of projections contained in an adopted local, regional, or statewide plan

A defined geographic scope of the area affected by the cumulative impact and an explanation of the geographic limitation

A summary of the expected environmental effects by the projects

A reasonable analysis of cumulative impacts of the relevant projects, including examination of feasible mitigation measures

CEQA Guidelines Section 15130(b)

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South Coast AQMD Roles Under CEQA

Lead Agency

Public agency with greatest responsibility for supervising or approving a project

Example: South Coast AQMD may be the Lead Agency for permit projects. South Coast AQMD is the Lead Agency for its own Rule Projects and Air Quality Management Plans.

Responsible Agency

Public agency other than the Lead Agency which has discretionary approval power over a portion of a project

Example: South Coast AQMD is the Responsible Agency when another public agency undertaking a project requires a South Coast AQMD permit for construction or operation of equipment that either controls or emits air pollutants for a portion of the project; however, South Coast AQMD does not have primary approval authority over the whole of the project.

Commenting Agency

Public agency reviewing and providing comments on a CEQA document authored by another public agency

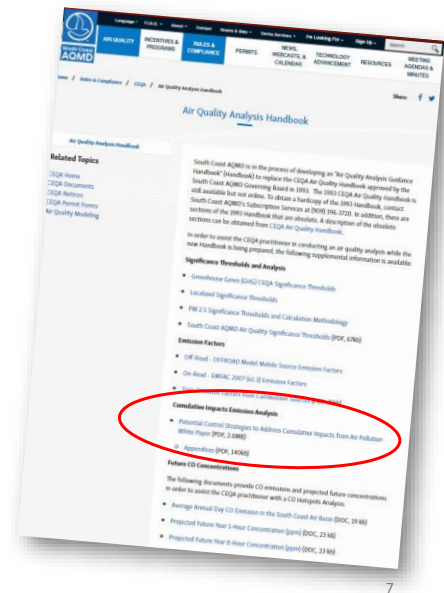
Example: South Coast AQMD is a Commenting Agency when its staff reviews and provides comments on another public agency's CEQA document for a project.

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South Coast AQMD's CEQA Air Quality Analysis

- South Coast AQMD has a unique role as resource agency with expertise in air quality
 - CEQA Air Quality Handbook provides information to assist in preparing regional, localized, and cumulative air quality analysis for CEQA purposes
- CEQA Air Quality Handbook recommends reviewing 2003 White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution



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The 2003 Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper

Born out of South Coast AQMD's adoption of Environmental Justice Initiatives, the intent of 2003 White Paper was to identify both regulatory and policy options to address cumulative impacts from air toxics

Appendix D of 2003 White Paper specifically discussed Cumulative Impact Analysis Requirements pursuant to CEQA and South Coast AQMD's approach to a CEQA Cumulative Impact Analysis

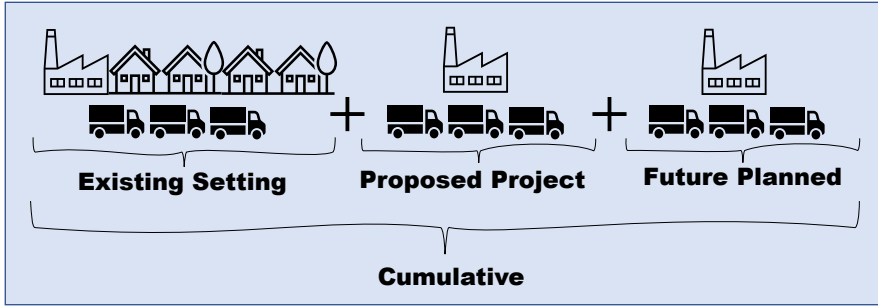
As a Lead Agency, South Coast AQMD "uses the same significance thresholds for project specific and cumulative impacts [...]" (Appendix D, 2003 White Paper). Meaning, projects that exceed the project-specific significance threshold are considered cumulatively considerable and vice-versa

As a CEQA Commenting Agency, South Coast AQMD "recommends that other public agencies perform cumulative impact analysis relative to air quality in the same manner as does AQMD" (Appendix D, 2003 White Paper)

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Individual Environmental Effects May be Cumulatively Considerable



A project's environmental effects may be individually limited but the incremental effect may be cumulatively considerable (CEQA Guidelines Section 15064(h))

Individual Environmental Effects May be Cumulatively Considerable: Identifying Existing Setting



Example of Existing Setting: A 205,949 square foot warehouse with 114 daily truck trips and 24/7 operations

Map Key

- Present Warehouse
- Existing Warehouses
- Existing Residential Uses
- Existing School Facilities
- Future Probable Warehouses

Individual Environmental Effects May be Cumulatively Considerable: Project Perspective

- Warehouse with a mitigated negative declaration (MND) identifying less than significant air quality impacts after mitigation
- MND stated cumulative air quality impacts for the warehouse would not be considerable because of its individual less than significant impacts across all air quality thresholds, including the air toxics analysis



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Overview of Development Process

Information Gathering and Analysis

Initial Objective and Scope

Concepts Development

Draft Guidance

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Information Gathering and Analysis

- Information gathering and analysis occurs throughout the CEQA policy development
- Information and analysis presented to the Working Group

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Stakeholder Input

-  South Coast AQMD's working group process is designed to be collaborative
-  Objective is to work through key issues through communication
-  Early participation from stakeholders during the development process is highly encouraged
-  Staff to hold periodic working group meetings to update stakeholders on latest developments

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For Discussion: A Phased Approach to Enhance Cumulative Analysis for Air Toxics under CEQA

Enhanced Qualitative Cumulative Analysis

List past, present, and probable future projects
Provide additional information using existing air quality metrics available to the public

Quantitative Cumulative Analysis if Warranted

Quantitative analysis of projects within geographic location impacting same receptors

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Feedback and Questions

Staff is seeking stakeholder feedback on:

- A phased approach including an enhanced qualitative analysis and a quantitative analysis if warranted
- Other potential approaches that staff should consider (e.g., CEQA tiering)
- Any other thoughts or concerns that staff should consider
- Visit: [http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-\(new\)](http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new))

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Next Steps

- Initiate individual meetings with stakeholders, environmental and community-based organizations, other governmental agencies, and CEQA practitioners

- Present updates during next working group meeting

- Continue Working Group Meetings

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Staff Contacts

Guidance for Cumulative Impacts from Air Toxics for CEQA Projects		General Questions
Alina Mullins Air Quality Specialist 909-396-2402 Amullins@aqmd.gov	Lijin Sun Program Supervisor 909-396-3308 Lsun@aqmd.gov	Michael Krause Assistant Deputy Executive Officer 909-396-3105 MKrause@aqmd.gov
Michael Morris Planning and Rules Manager 909-396-3282 Mmorris@aqmd.gov		
Sign up for the mailing list at: https://www.aqmd.gov/sign-up (select CEQA Updates)		

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