

# Working Group Meeting #6

## Cumulative Impacts from Air Toxics for CEQA Projects



**November 6, 2024**

**2:30 p.m. (PST)**

### REMOTE MEETING INFORMATION

Join Zoom Webinar Link:

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

Webinar ID: 945 5636 9595

Dial In: (669) 900 6833



# Agenda

- I. Overview of Initial Objective and Recap of Previous Working Group Meetings
- II. Proposed Revised Cumulative Thresholds and Updated Retrospective Sensitivity Analysis
- III. Recent Updates from Other Agencies and Stakeholders
- IV. Next Steps
- V. Staff Contacts

# Recap of Previous Meetings



# Why Analyze Cumulative Impacts to Air Toxics?

*CEQA requires analysis of direct, indirect, and cumulative environmental impacts<sup>1</sup>*

Need for Additional Guidance	Policy Goals	Policy <u>NOT</u> Intended To
<ul style="list-style-type: none"> <li>• Opportunity to update existing South Coast AQMD cumulative analysis guidance that was developed in 2003<sup>2</sup></li> <li>• CEQA lawsuit by California Department of Justice in 2021<sup>3</sup></li> <li>• Community concerns about high health risk impacts from air toxics, particularly from aggregation of warehouses</li> <li>• <b>South Coast AQMD has initiated policy development to evaluate cumulative air quality impacts from increased concentrations of toxics during project operation</b></li> </ul>	<p>Provide streamlined guidance that:</p> <ul style="list-style-type: none"> <li>• Serves as a tool Lead Agencies can rely upon to make informed decisions on projects with potential for cumulative air toxics</li> <li>• Promotes health equity</li> <li>• Addresses community concerns and provides information on a project's potential cumulative health impact</li> </ul>	<ul style="list-style-type: none"> <li>• Delay or stop proposed projects</li> <li>• Automatically assume that all air toxics impacts are cumulatively considerable</li> <li>• Require Environmental Impact Reports (EIRs) for all proposed projects</li> </ul>

1. California Environmental Quality Act (CEQA) Guidelines Section 15130

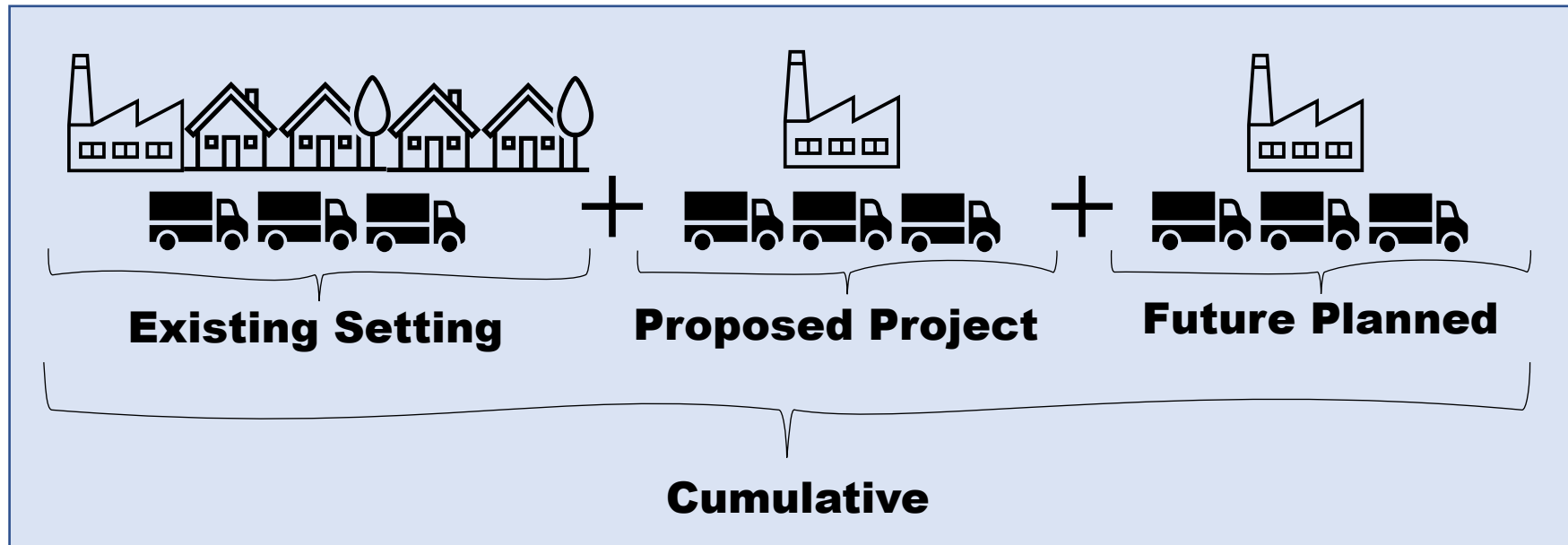
2. South Coast AQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, August 2003, accessed here: <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf>

3. People of the State of California v. City of Fontana, San Bernardino Superior Court, Case No. CIVSB2121829

# Why We Need to Provide Additional Guidance

Our current policy recommends using the same significance thresholds for project-level and cumulative-level impacts, which may underestimate a project's cumulative impact <sup>1</sup>

- A project's incremental effect on the environment, though individually limited, may be *cumulatively considerable*<sup>2</sup>



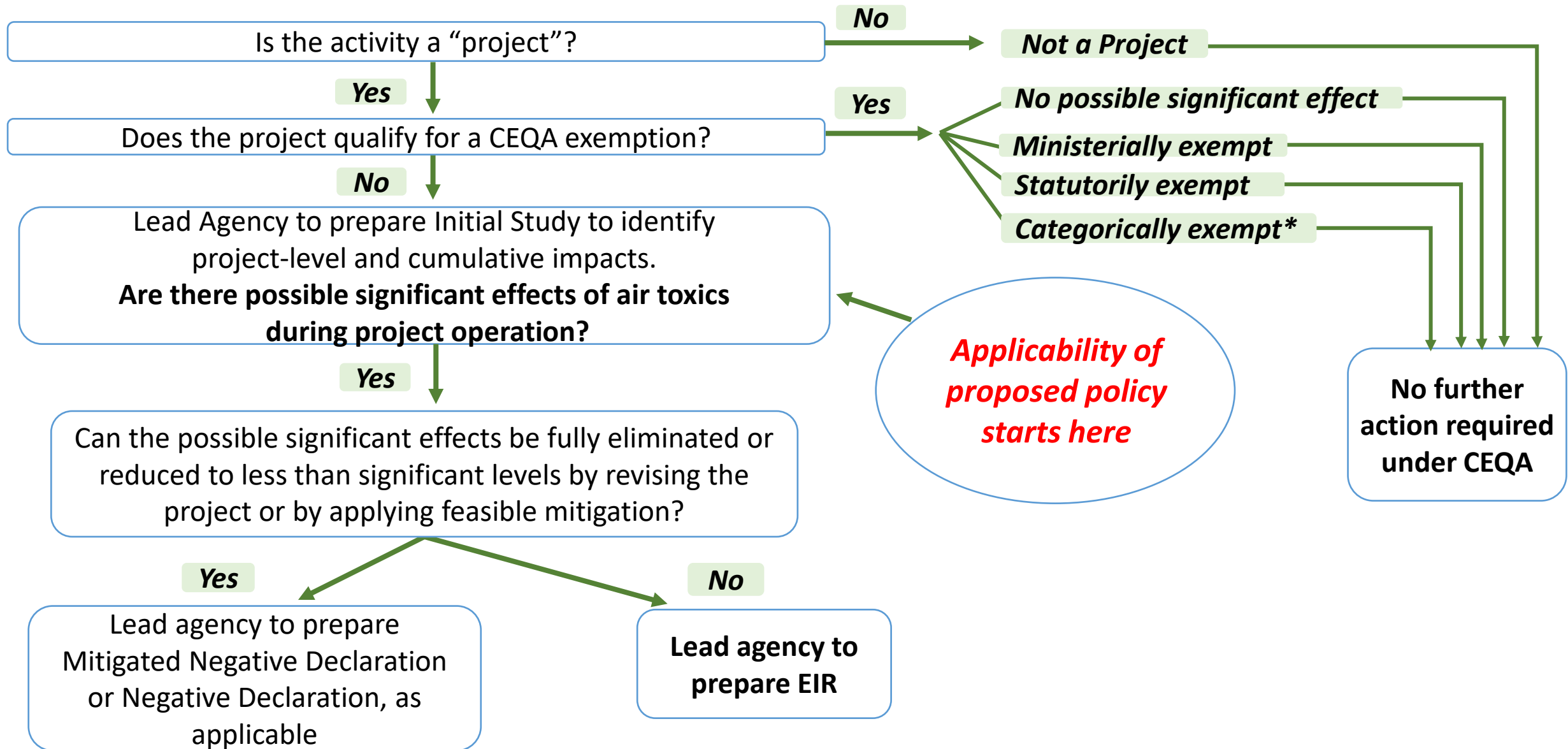
- Cumulatively Considerable – when incremental effects of an individual project are significant when viewed in connection with effects of past, other current, and probable future projects<sup>3</sup>

1. South Coast AQMD's Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, August 2003

2. CEQA Guidelines Section 15064(h) - Determining the Significance of the Environmental Effects Caused by a Project

3. CEQA Guidelines Section 15065(a)(3) - Mandatory Findings of Significance

# At what step in the CEQA review process will the Proposed Policy apply?

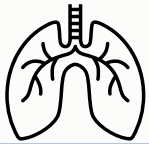


\*Provided that none of the exceptions clauses in CEQA Guidelines Section 15300.2 are triggered

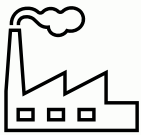
# Proposed Policy Considers Key Project Features

## Key Project Features

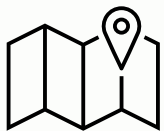
Potential emissions of air toxics & cancer risk (CR) during operation phase



Land use type & project size



Project location and its proximity to sensitive receptors

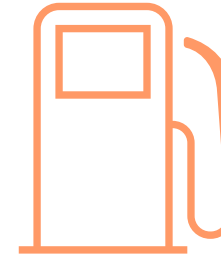


## Examples of land uses with varying levels of potential CR impacts



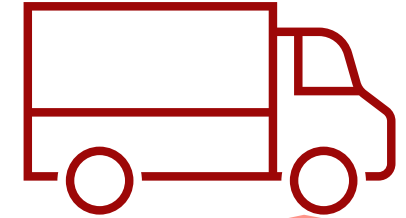
### Low CR Impacts

- Residential (apartment, condo, mobile home, single family home development project)
- Commercial (office, bank, government, pharmacy)
- Recreational (arena, park, restaurant, golf course, health club, hotel, theater)
- Educational (daycare, school, college, library, church/temple)
- Retail (auto care, market, mall, shopping store, supermarket)



### Medium CR Impacts

- Truck yard (enclosed, parking lot, structure, asphalt/non-asphalt)
- Retail (gas station)
- Certain small industrial projects
- Linear (bridge, road, freeway, new or improvement)



### High CR Impacts

- Industrial (warehouse, light & heavy manufacturing, industrial park)
- Major transportation projects (airport, port, railyard, bus/train station)
- Major planning projects (Master Plan, General Plan, Specific Plan)

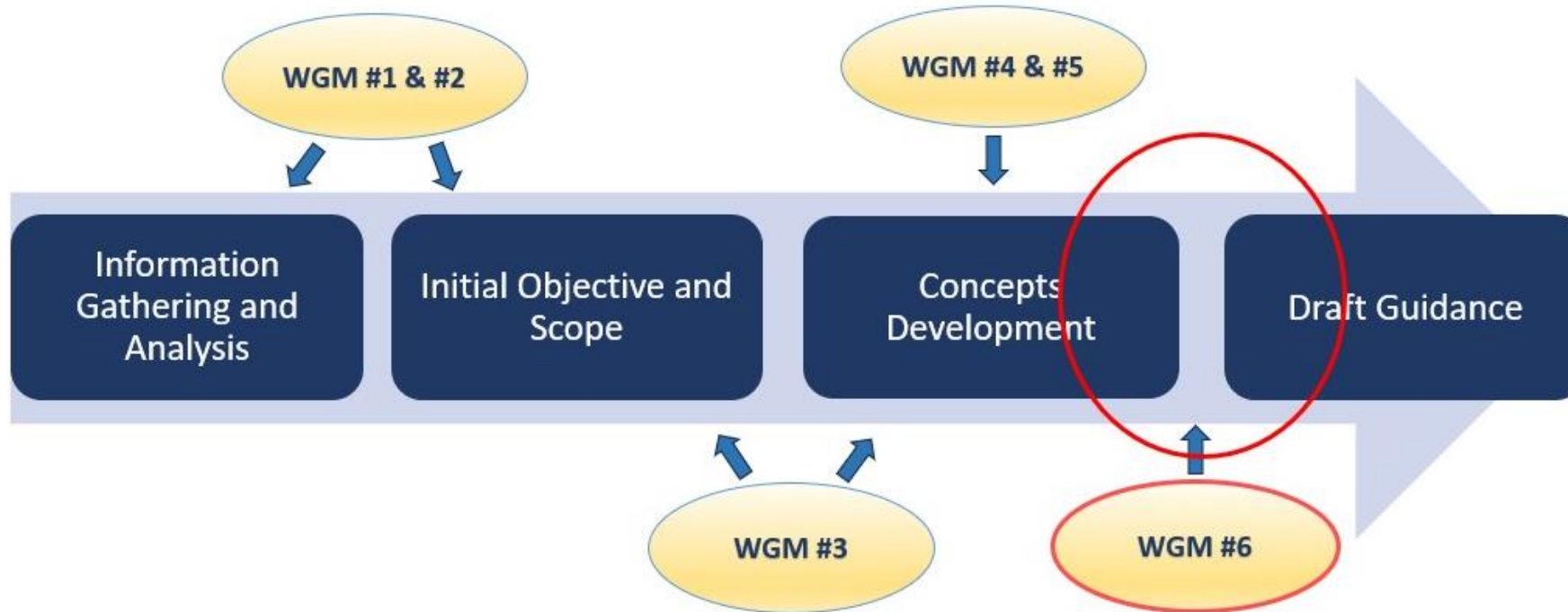
# Overview of Previous Working Group Meetings

Staff is developing additional guidance for evaluating cumulative impacts from air toxics during the **operation phase** of projects subject to CEQA

- Effort is to provide a step-by-step approach to identify projects that warrant further evaluation
- Staff is working with stakeholders on details of guidance
  - Initiated public process with Working Group Meeting (WGM) #1 in February 2022
  - To date, five WGMs have been held
  - Information on previous WGMs can be found on South Coast AQMD's CEQA Policy Development webpage at [http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-\(new\)](http://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new))

The screenshot shows the South Coast AQMD website. The top navigation bar includes links for Select Language, F.I.N.D., About, Contact, Grants & Bids, Online Services, I'm Looking For, Sign Up, and Search. The main navigation menu features AIR QUALITY, INCENTIVE PROGRAMS, RULES & COMPLIANCE (highlighted), PERMITS, NEWS, WEBCASTS, & CALENDAR, TECHNOLOGY ADVANCEMENT, RESOURCES, and MEETING AGENDAS & MINUTES. The South Coast AQMD logo is visible on the left. The breadcrumb trail reads: Home / Rules & Compliance / CEQA / CEQA Policy Development (NEW). The page title is CEQA Policy Development (NEW). A sidebar menu on the left lists CEQA Policy Development (NEW) and CEQA. The main content area contains the following text: "South Coast AQMD is in the process of developing an 'Air Quality Analysis Guidance Handbook' (Handbook) to replace the CEQA Air Quality Handbook approved by the South Coast AQMD Governing Board in 1993. As part of this process, South Coast AQMD staff is updating existing and developing new air quality analysis guidance to support public agencies when they evaluate air quality impacts pursuant to the requirements of CEQA. More information about updates to and development of new air quality analysis guidance, including working group materials and presentations, can be found below. More information on the 1993 CEQA Air Quality Handbook can be obtained from [Air Quality Analysis Handbook \(aqmd.gov\)](http://www.aqmd.gov)." Below this text are sections for "Cumulative Impacts from Air Toxics for CEQA Projects", "About", and "Resources". The "Resources" section lists "Working Group Meeting #5 - March 20, 2024" with a "Presentation (PDF, 2MB)" link, and "Working Group Meeting #4 - June 6, 2023" with a "Presentation (PDF, 1MB)" link. At the bottom, "Working Group Meeting #3 - January 24, 2023" is partially visible. Social media share icons for Facebook and Twitter are located in the top right corner.





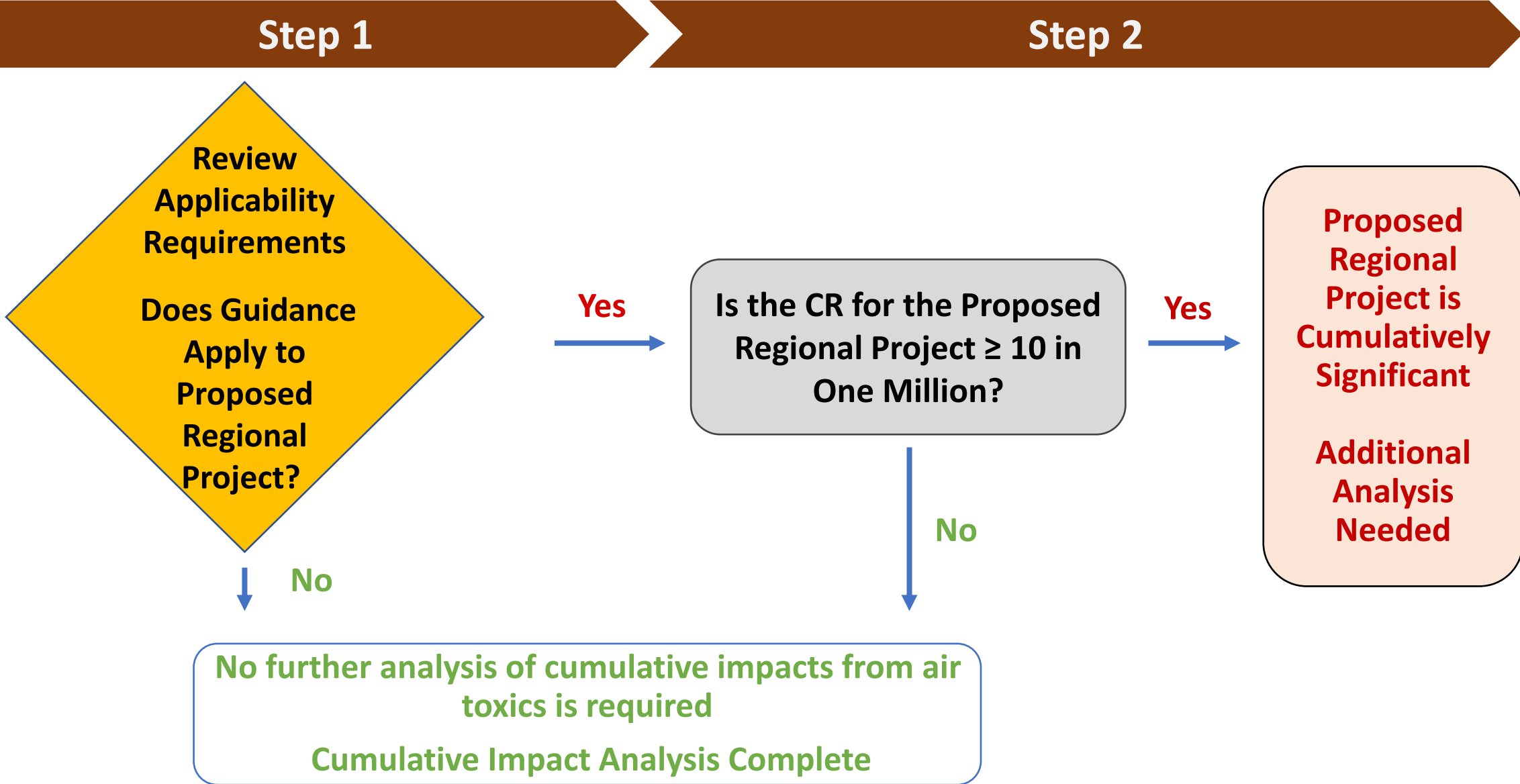
## Goals for WGM #6

- Provide updates on criteria for conducting a cumulative impact analysis for TACs
- Seek feedback on updated information

# **Process for Regional Projects Analysis**

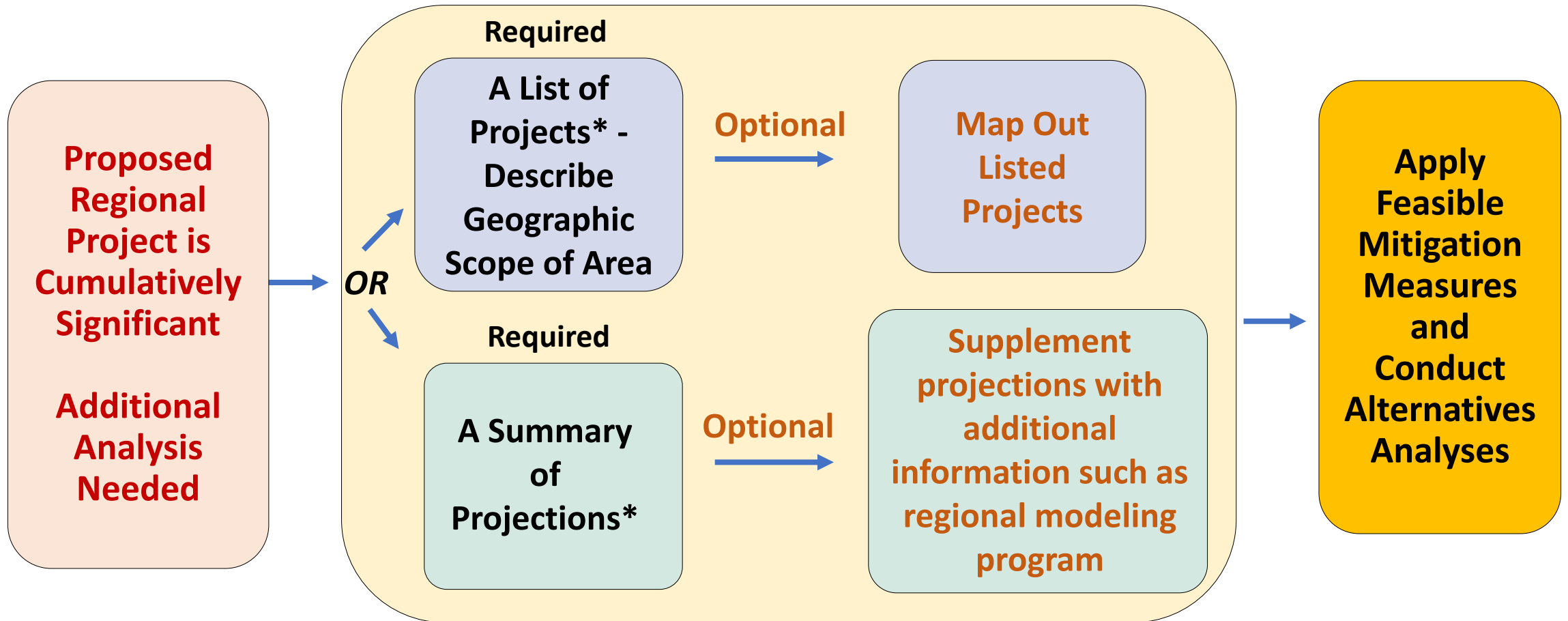


# Recap of Process for Analyzing Regional Projects



# Recap of Process for Analyzing Regional Projects

## Reminder



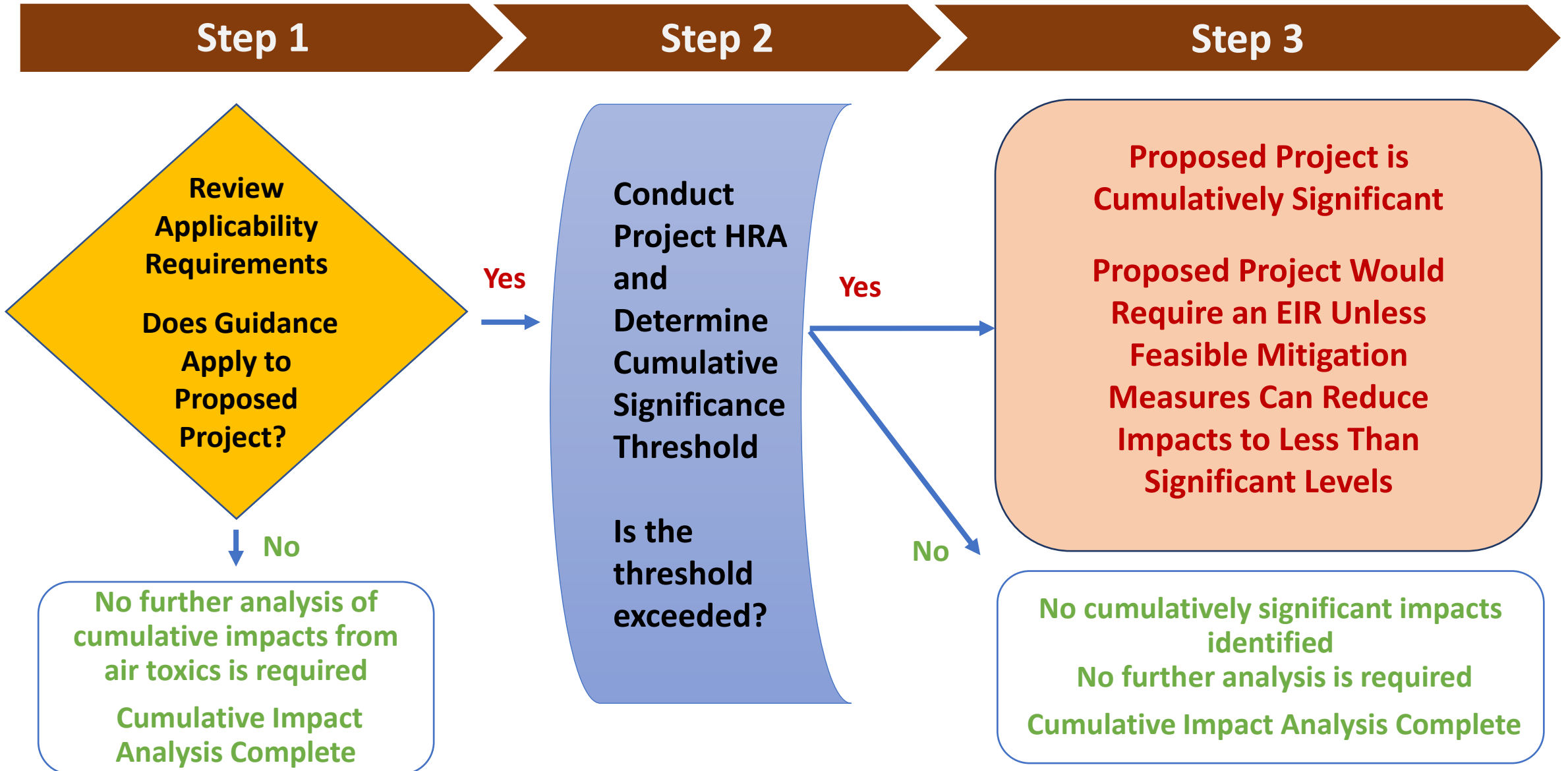
**Describe Severity of Cumulative Significant Impacts  
Via a Qualitative Analysis**

\*CEQA Guidelines Section 15130(b)

# Proposed Revised Process for Project-Level Analysis

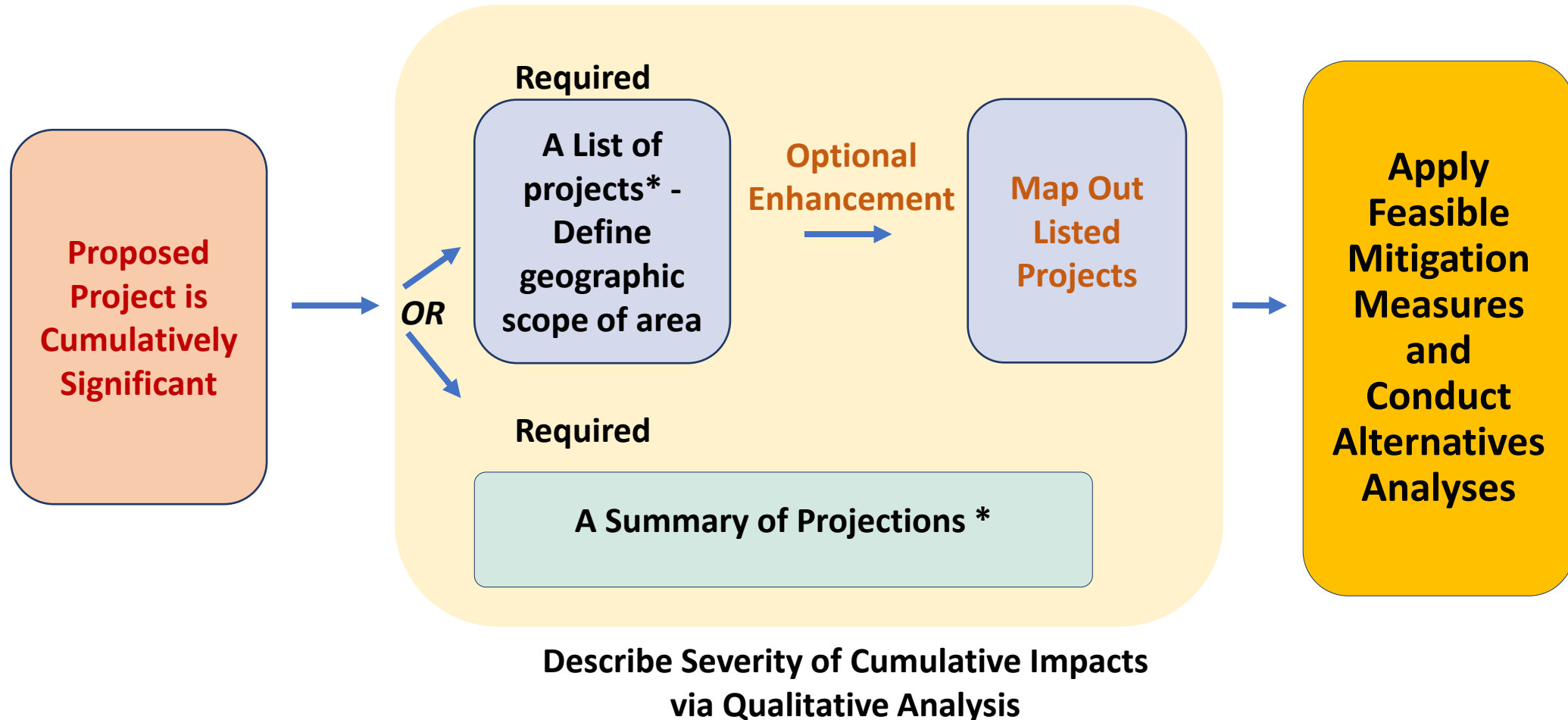


# Proposed Revised Process for Project-Level Analysis



# Proposed Revised Process for Project-Level Analysis

## Reminder



\*CEQA Guidelines Section 15130(b)

# WGM #5 Comments on Previously Proposed Step 3

## Determining Cumulative Significance Threshold

Project's Background MATES Cancer Risk	Previously Proposed Initial Threshold Based on Cancer Risk [cases per million]
Most stringent	A (e.g., 1)
> 90 <sup>th</sup> percentile	B (e.g., 3)
90 <sup>th</sup> to 50 <sup>th</sup> percentile	C (e.g., 5)
50 <sup>th</sup> to 30 <sup>th</sup> percentile	D (e.g., 7)
< 30 <sup>th</sup> percentile	E (e.g., 10)



Previously Proposed Additional Criteria	
#1	<b>High Volume Diesel-fueled Sources</b> Trucks, trains, etc., at or near the Proposed Project site based on certain distance to sensitive receptors
#2	<b>Post-2018 Projects with High Volume Diesel –fueled Trucks</b> Along Proposed Project's truck route
#3	<b>Sensitive Receptor Population</b> Either within AB 617 area or > 80 <sup>th</sup> percentile CalEnviroScreen 4.0
#4	<b>Other Considerations</b> Seeking suggestions

### Summary of Comments Received

Criterion #1 may result in double-counting

Criterion #2 should use a weighted-average of EMFAC2021 data, instead of maximum emission rate from worst-case vehicle type

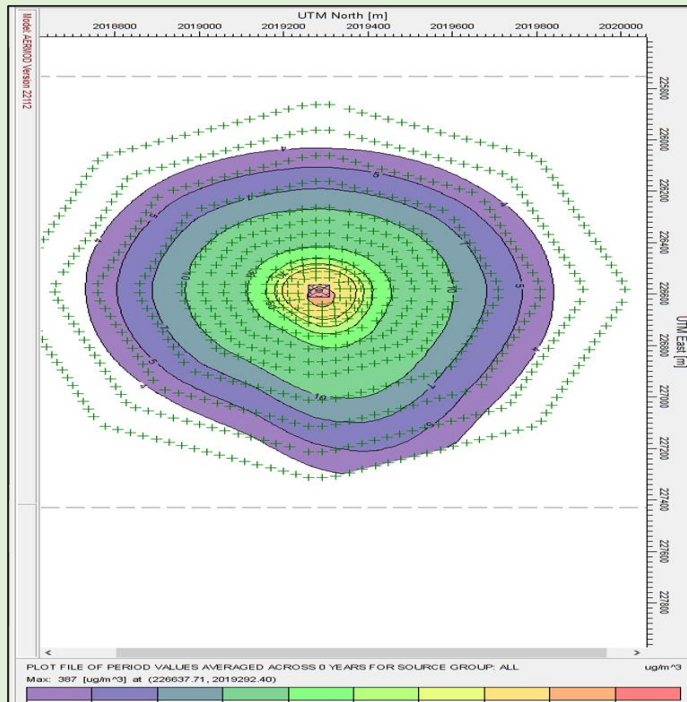
Criterion #3 should not rely on CalEnviroScreen for regulatory purposes



# Response to Comments Re: Previously Proposed Criterion #1

## Comments from Stakeholders: Criterion #1 may be double counting impacts

- Proposed Project's Cumulative Significance Threshold is based on MATES Cancer Risk percentile and is already addressed
- Proposed Project's truck trip emissions should already be assessed in the CEQA document



**South Coast AQMD Response:**  
Recommend removal of Previously Proposed Criterion #1

## ~~Previously Proposed additional Criteria~~

### ~~High Volume Diesel-fueled Sources~~

- ~~#1 Trucks, trains, etc., at or near the Proposed Project site based on certain distance to sensitive receptors~~

# Response to Comments Re: Previously Proposed Criterion #2

**Comments from Stakeholders:** Criterion #2 used overly conservative assumptions and selected the worst-case vehicle type (garbage truck)

- Previously Proposed Criterion #2 used Maximum Value (T7 SWCV Class 8) of PM2.5 RUNEX (g/mile) emission rates, derived from EMFAC2021



**South Coast AQMD Response:** Criterion #2 modified to use **Weighted Average** of PM2.5 RUNEX (g/mile) emission rates, derived from EMFAC2021 modeling results

**Weighted Average** (instead of Maximum Value) better represents:

- Range of heavy-duty vehicle emissions on the road
- Typical truck types seen in on-road traffic

**Weighted Average** calculated based on the following vehicle types:

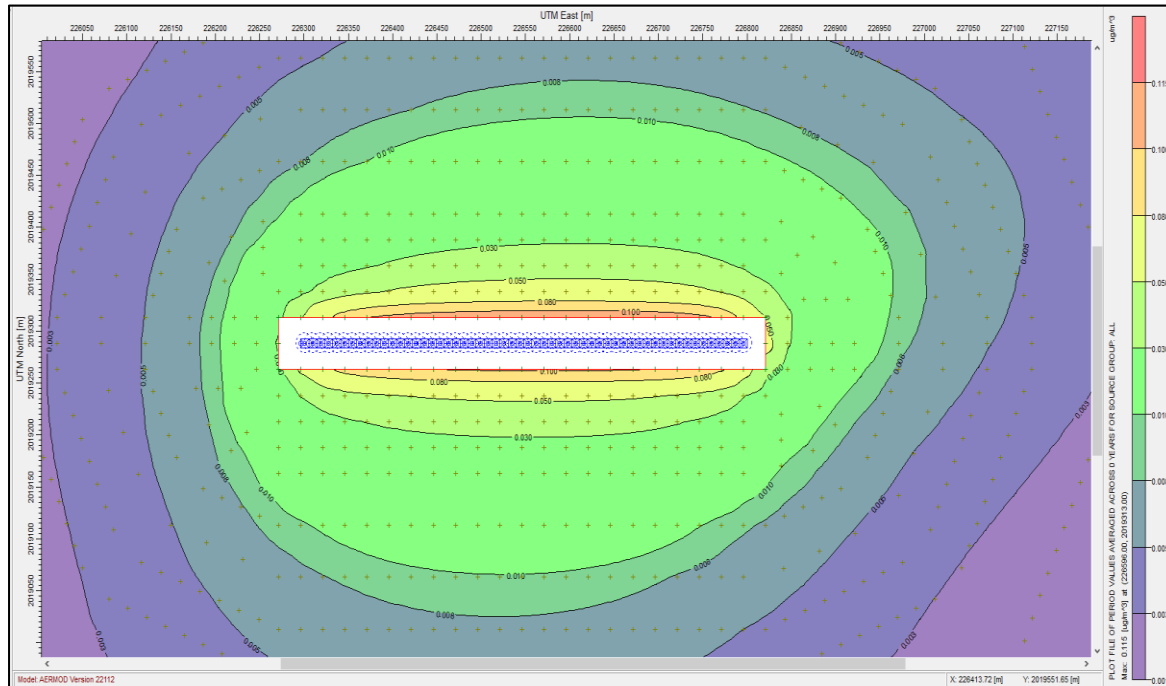
- T6/T7 Trucks, LDT, LHD, Motor Coach, and PTO

**Threshold adjusted from 100 in one million to 10 in one million:**

- Consistent with South Coast AQMD CEQA, and Rule 1401 threshold
- More conservative and health protective

**Latest Met. Station data set V.11 applied**

- <https://www.aqmd.gov/home/air-quality/meteorological-data/data-for-aermod>



# Response to Comments Re: Previously Proposed Criterion #3

**Comments from Stakeholders: Criterion #3 should not rely on CalEnviroScreen for regulatory purposes**

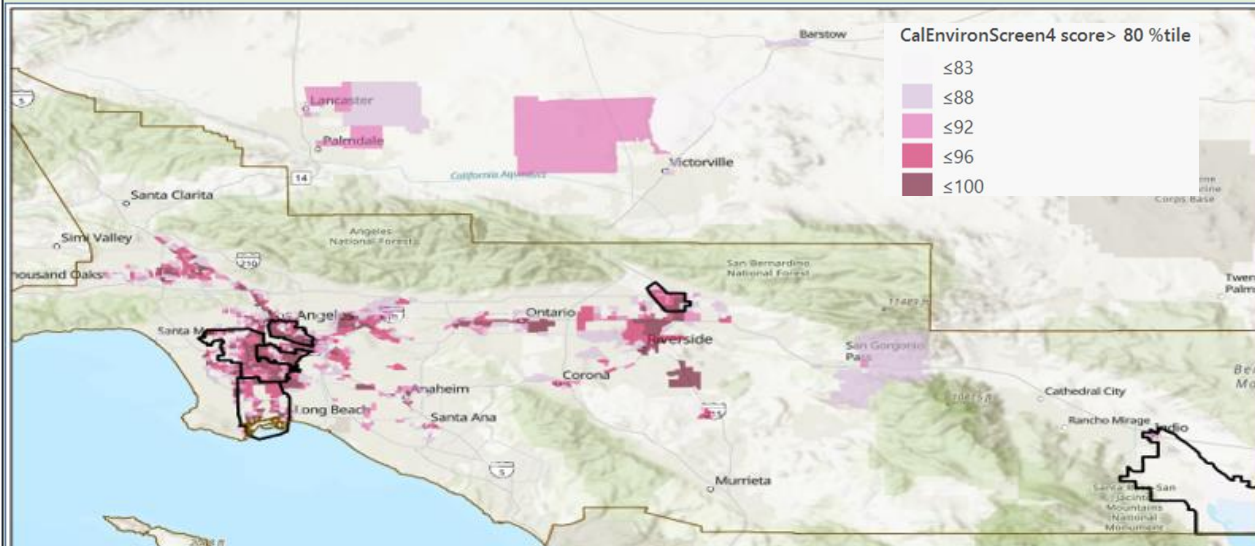
Previously Proposed Criterion #3 would be triggered based on Proposed Project's location either in:

- An AB 617 area or
- Area greater than 80th Percentile in CalEnviroScreen 4.0

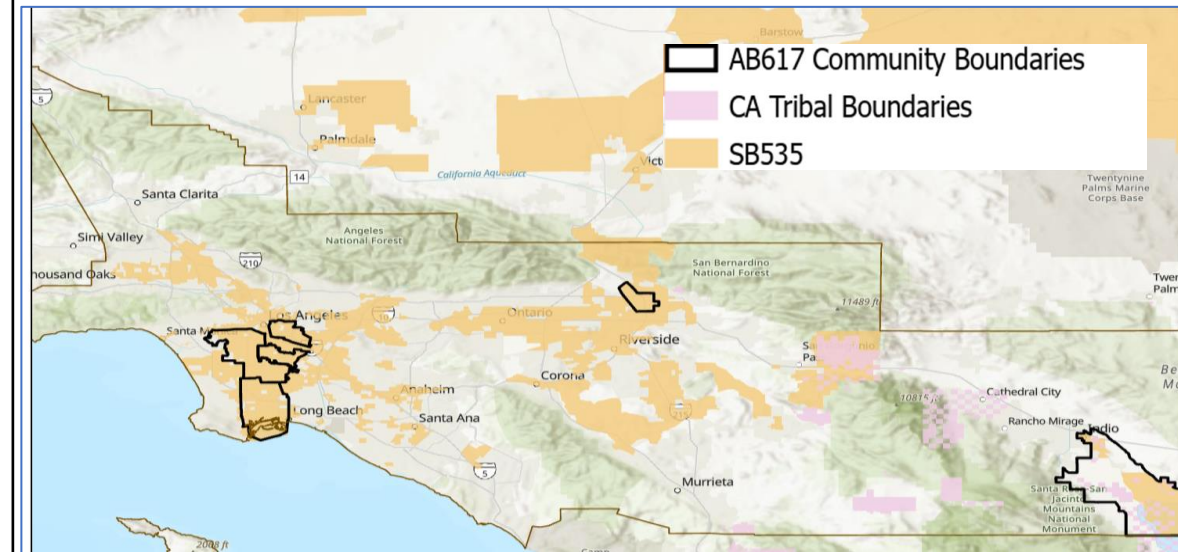


**South Coast AQMD Response:** Recommend keeping AB 617 but using SB535 Disadvantaged Communities to Designate Sensitive Receptor Population in lieu of CalEnviroScreen because:

- SB535 targets top 25% of CalEnviroScreen tracts, along with additional communities
- SB535 is more comprehensive and is the most recent state designation



Maps provided by South Coast AQMD



Maps provided by South Coast AQMD

# Comparison of Previous Proposal vs. Current Proposal

Previously Proposed Cumulative Significance Threshold



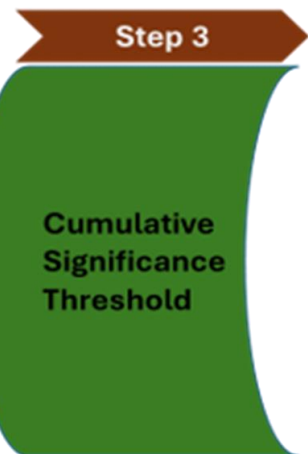
Currently Proposed Cumulative Significance Threshold

Project's Background MATES* Cancer Risk	Previously Proposed Initial Threshold Based on Cancer Risk [cases per million]
Most stringent	A (e.g., 1)
> 90 <sup>th</sup> percentile	B (e.g., 3)
90 <sup>th</sup> to 50 <sup>th</sup> percentile	C (e.g., 5)
50 <sup>th</sup> to 30 <sup>th</sup> percentile	D (e.g., 7)
< 30 <sup>th</sup> percentile	E (e.g., 10)

+

Previously Proposed Additional Criteria	
#1	<b>High Volume Diesel-fueled Sources</b> Trucks, trains, etc., at or near the Proposed Project site based on certain distance to sensitive receptors
#2	<b>Post-2018 Projects with High Volume Diesel –fueled Trucks</b> Along Proposed Project's truck route
#3	<b>Sensitive Receptor Population</b> Either within AB 617 area or > 80 <sup>th</sup> percentile CalEnviroScreen 4.0
#4	<b>Other Considerations</b> Seeking suggestions

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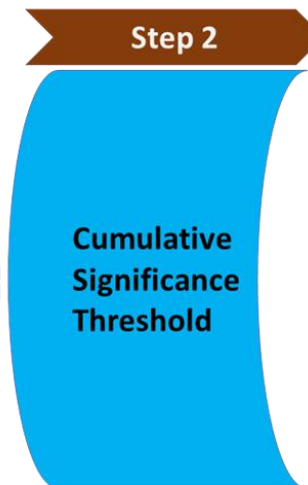
## Revised Initial Threshold

Project's Background MATES* Cancer Risk	Proposed Revised Initial Threshold Based on Cancer Risk [per million]
Most stringent	1
> 90 <sup>th</sup> percentile	3
90 <sup>th</sup> to 50 <sup>th</sup> percentile	5
50 <sup>th</sup> to 30 <sup>th</sup> percentile	7
< 30 <sup>th</sup> percentile	10

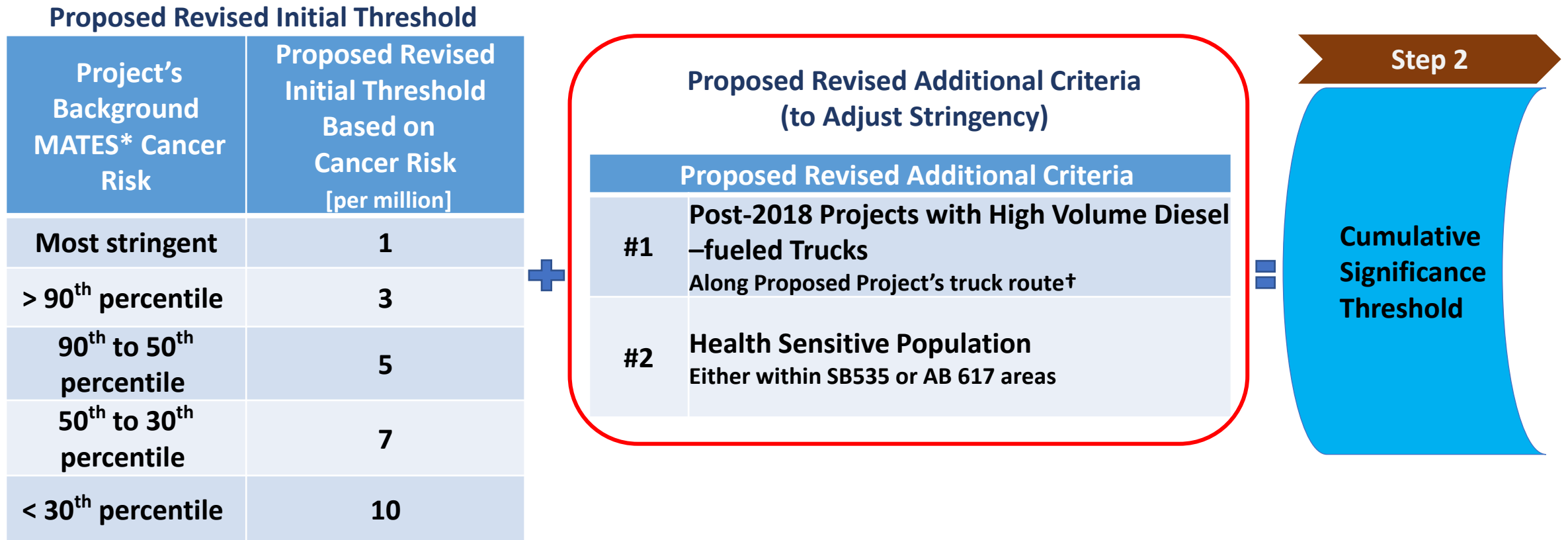
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Revised Additional Criteria (to Adjust Stringency)	
Revised Additional Criteria	
#1	<b>Post-2018 Projects with High Volume Diesel –fueled Trucks</b> Along Proposed Project's truck route†
#2	<b>Health Sensitive Population</b> Either within SB535 or AB 617 areas

=



# Proposed Revised Project-Level Analysis: Step 2 of 3 – Determine Cumulative Significance Threshold

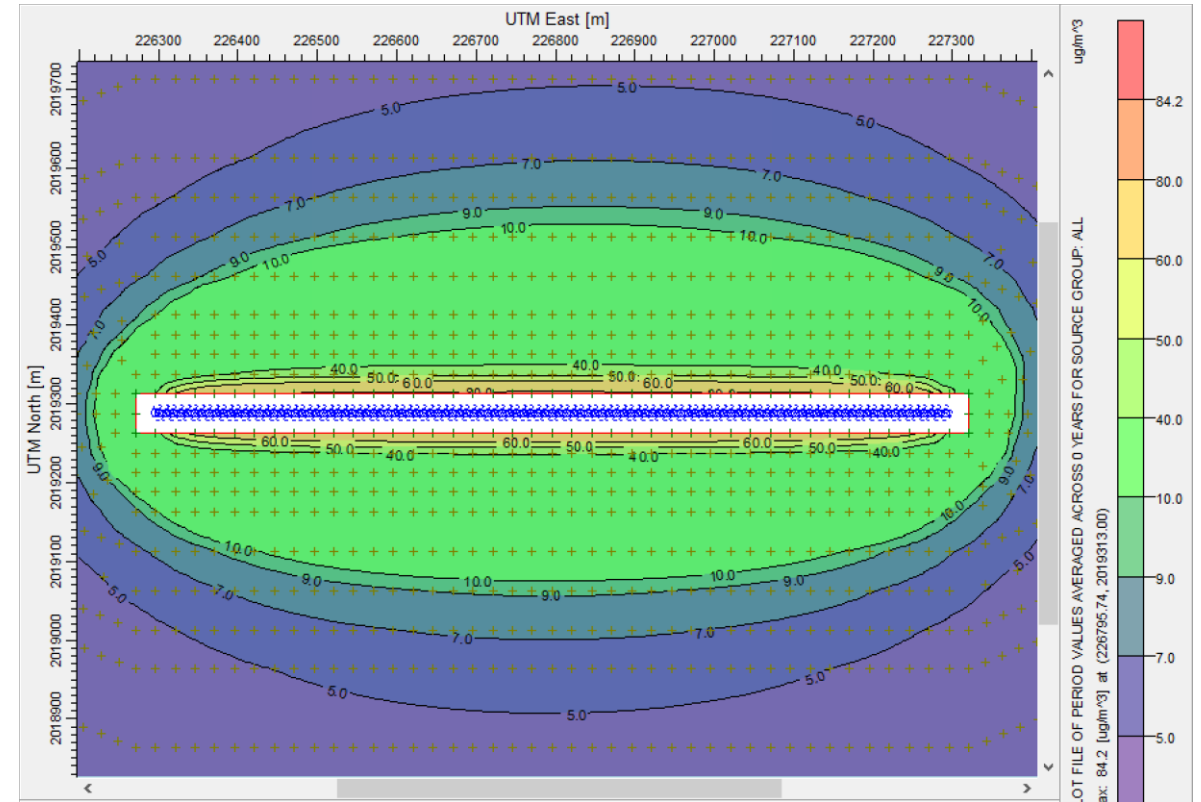


\* Most current MATES V is based on 2018 data

- If one or more additional criteria apply, the initial threshold will be adjusted to the next, more stringent level. For example, the least stringent initial threshold is 10 in one million. If Criterion #1 applies, the cumulative threshold will adjust to a more stringent level: 7 in one million. If Criterion #2 also applies, the cumulative threshold will further adjust to the next level: 5 in one million.
- † Truck route is from the Proposed Project site to major freeway, within certain distance to sensitive receptors, add all diesel-fueled trucks from post-2018 projects.

# Proposed Revised Criterion #1: High Volume Diesel-Fueled Trucks Along Route to Freeway

- Cancer Risk (CR) calculated based on OEHHA 2015 Risk Assessment Guidelines:
  - Residential cancer: 30-year exposure-RMP Using the Derived Method
- Calculated truck trips that trigger **CR threshold of 10 in a million** from the calculated ground level concentration ( $\mu\text{g}/\text{m}^3$ )
  - **951 one-way trips/day**



Revised Criterion #1 truck trips (Annual Average Daily Traffic (AADT)) =

[ Most recent Caltrans truck trips + Proposed Project truck trips + Future truck trips (if known) - 2018 Caltrans truck trips ]

# Response to Stakeholder Questions on Modeling Parameters used for Developing Proposed Revised Criterion #1: Receptors and source type

## Receptor Type and Spacing:

Receptor Type	Number of Receptor
Cartesian Plant Boundary	4
Cartesian Plant Boundary Intermediate	84
Fenceline Grid	1824

AERMOD Segment Distance (meter)	AERMOD Tier Spacing (meter)
100	25
200	50
400	100

## Source Type:

- Along Proposed Project's truck route
- Calculated CR for 25 Meteorological Stations (Dataset V.11) using AERMOD Version 23132
- Line Volume Source: Truck route from project site to major freeway

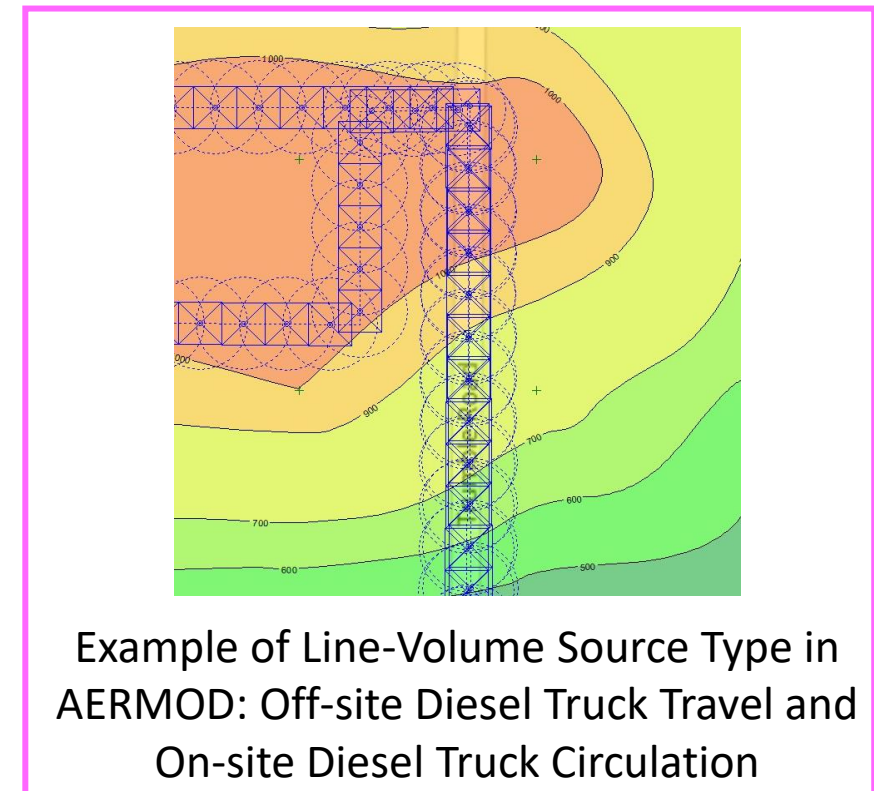
Model Type	Mode I ER (g/s)	Segment Distance (m)	Emission Rate (one truck drive one time per day)	CR Threshold (in the million)	DPM emission rate (weighted Avg.) - (g/mile)	Plume Hight (m)	Plume Width (m)
Line Volume	1	1000	1.5E-07 (g/s)	10	0.02	5.1	9.0

# Proposed Revised Criterion #1: Sensitivity Analysis

Staff ran different types of sources in AERMOD and compared results for **KCNO Meteorological Station**



Source Type (1000 meter-length)	Emission Rate Used In The Model (g/s) or (g/s/m <sup>2</sup> )	Emission Rate For One Truck	One-Way Trips Per Day
Rline Source (not regulatory default option)*	1 (g/s/m <sup>2</sup> )	1.6E-11 (g/s/m <sup>2</sup> )	<b>1,363</b>
Line Source	1 (g/s/m <sup>2</sup> )	1.6E-11 (g/s/m <sup>2</sup> )	<b>1,176</b>
<b>Line Volume Source</b>	<b>1 (g/s)</b>	<b>1.5E-07 (g/s)</b>	<b>1,010</b>



\*AERMOD's RLINE source algorithm can be used to represent a travelled roadway with either single or multiple lanes of traffic, <https://www.weblakes.com/2019/10/15/modeling-tip-october-2019/>

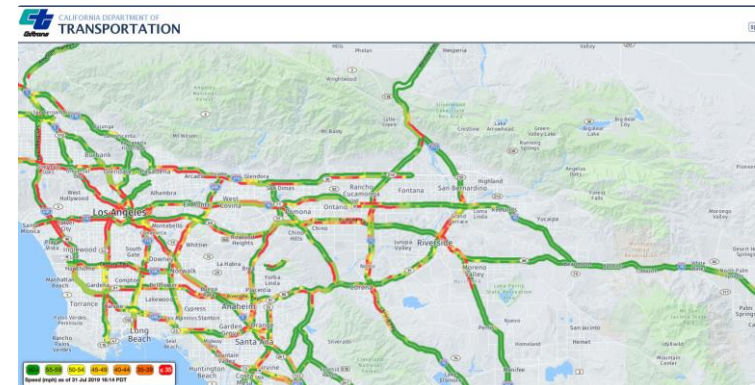
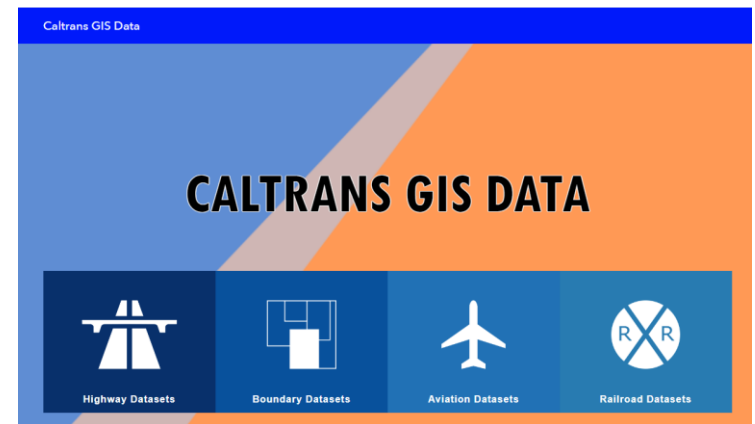


# Available Data Resources When Evaluating Proposed Revised Criterion #1

## Caltrans Traffic Census Program

- Truck traffic volumes for freeway on- and off-ramps- Annual Average Daily Traffic (AADT) (<https://dot.ca.gov/programs/traffic-operations/census>)
- Highway datasets ([Caltrans Home \(arcgis.com\)](https://www.arcgis.com/home))
- Caltrans Performance Measurement System ([PeMS](#))

## Other Traffic Data from City, County, and Other Government Agencies



# Retrospective Sensitivity Analysis Comparison



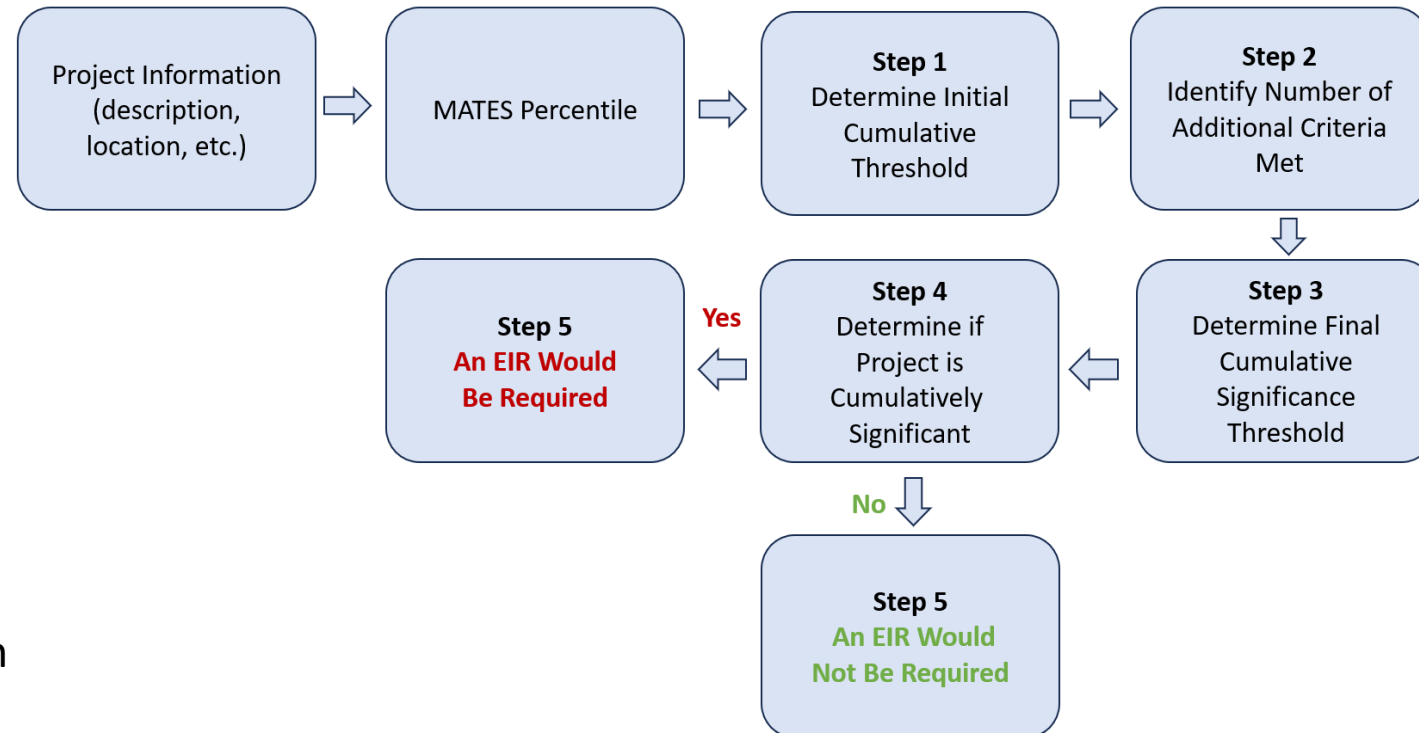
# Retrospective Sensitivity Analysis Comparison

	Analysis Based on Previously Proposed Methodology (WGM #5)	Analysis Based on Proposed Revised Methodology
Initial Thresholds	Based on MATES Percentile	Based on MATES Percentile
Additional Criteria	Criterion #1: High Volume Diesel-fueled Mobile Sources (Trucks, trains, etc., at or near the Proposed Project site based on certain distance to sensitive receptors) <b>91 one-way truck trips/day</b>	Removed
	Criterion #2: Post-2018 Projects with High Volume Diesel –fueled Trucks (Along Proposed Project’s truck route) <b>368 one-way truck trips/day</b>	Criterion #1: Post-2018 Projects with High Volume Diesel –fueled Trucks (Along Proposed Project’s truck route) <b>951 one-way truck trips/day</b>
	Criterion #3: Sensitive Receptor Population <b>Either within AB 617 area or &gt; 80<sup>th</sup> percentile CalEnviroScreen 4.0</b>	Criterion #2: Health Sensitive Population <b>Either within SB 535 or AB 617 areas</b>

# Recap: Methodology to Determine if an EIR is Required

## Process to determine if an EIR is required:

- Gather project information (e.g., description, location)
- **Step 1** - Determine the **Initial Cumulative Threshold** based on MATES percentile
- **Step 2** - Identify if project triggers any of the additional criteria
- **Step 3** - Determine the **Final Cumulative Significance Threshold** based on the initial cumulative thresholds in Step 1 and the number of additional criteria met in Step 2
- **Step 4** - Compare the project's operational CR to the **Final Cumulative Significance Threshold** and determine if project is cumulatively significant
- **Step 5** – For a cumulatively significant project, an EIR would be required unless the project design is modified, or mitigation can reduce impacts less than significant levels



# Results of Retrospective Sensitivity Analysis For Warehouses & Distribution Centers Land Use - Example

**Project Description in MND:** Construction of a 232,575 square foot warehouse and a hotel with 125 rooms on 15-acre site. Warehouse building with 39 dock doors and 142 daily truck trips.

Project's operational CR = 1.1 in one million.

## Step 1 – Determine the Initial Cumulative Threshold

Project's MATES Percentile	Initial Cumulative Threshold
76	5

Project's Background MATES* Cancer Risk	Proposed Revised Initial Threshold Based on Cancer Risk [per million]
Most stringent	1
> 90 <sup>th</sup> percentile	3
90 <sup>th</sup> to 50 <sup>th</sup> percentile	5
50 <sup>th</sup> to 30 <sup>th</sup> percentile	7
< 30 <sup>th</sup> percentile	10

## Step 2 – Determine the Number of Proposed Revised Additional Criteria Triggered

- Criterion # 1: Post-2018 Projects with High Volume Diesel –fueled Trucks

**Revised Criterion #1 truck trips (Annual Average Daily Traffic (AADT) =**  
**[ Most recent Caltrans truck trips + Proposed Project truck trips + Future truck trips (if known) - 2018 Caltrans truck trips]**

Most recent – 2022 Caltrans Annual Average Daily Truck Traffic (AADT)	Proposed Project Truck Trips per Day	2018 Caltrans Truck Numbers (AADT)	Calculated Criterion #1 Truck Trips per day	Criterion # 1 Threshold Truck Trips per day	Criterion # 1 Triggered?
22,538	142	20,296	2,384	951	<b>Yes</b>

# Results of Retrospective Sensitivity Analysis For Warehouses & Distribution Centers Land Use - Example (Cont'd)

## Step 2 – Determine the Number of Proposed Revised Additional Criteria Triggered (cont'd)

- Criterion # 2: Health Sensitive Population

Project is in SB 535 areas?	Project is in AB 617 areas?	Criterion #2 Triggered?
No	No	No

## Step 3 - Determine the Final Cumulative Significance Threshold

Initial Cumulative Threshold	Criterion #1 Triggered?	Criterion #2 Triggered?	Final Cumulative Significance Threshold
5	Yes	No	3

## Step 4 – Compare the Project's Operational CR to the Final Cumulative Significance Threshold

Project's Operational CR	Final Cumulative Significance Threshold	Project is Cumulatively Significant?
1.1	3	No

# Results of Previous versus Proposed Revised Retrospective Sensitivity Analysis

Land Use Type	Total Projects Reviewed	How Many Projects Would Require an EIR? (Number/%)	
		Previous Results	Current Results
1 – Goods Movement†	13	2 / 15%	2 / 15%
2 – Warehouses & Distribution Centers*	37	15 / 41%	7 / 19%
3 – Airports†	4	0 / 0%	0 / 0%
4 – Industrial & Commercial*	17	4 / 24%	1 / 6%
5 – Waste and Water-Related*	26	0 / 0%	0 / 0%
6 – Utilities†	10	1 / 10%	1 / 10%

\* Land Use with a 1-year project list from June 2022 to June 2023

† Land Use with a 5-year project list from June 2018 to June 2023

# Results of Previous versus Proposed Revised Retrospective Sensitivity Analysis

Land Use Type	Total Projects Reviewed	How Many Projects Would Require an EIR? (Number/%)	
		Previous Results	Revised Results
7 – Transportation*	10	0 / 0%	0 / 0%
8 – Institution*	26	0 / 0%	0 / 0%
9 – Medical Facilities†	16	1 / 6%	1 / 6%
10 – Retail*	16	1 / 6%	1 / 6%
11 – General Land Use (Residential)*	57	1 / 2%	1 / 2%
12 – Plans and Regulations*	9	0 / 0%	0 / 0%

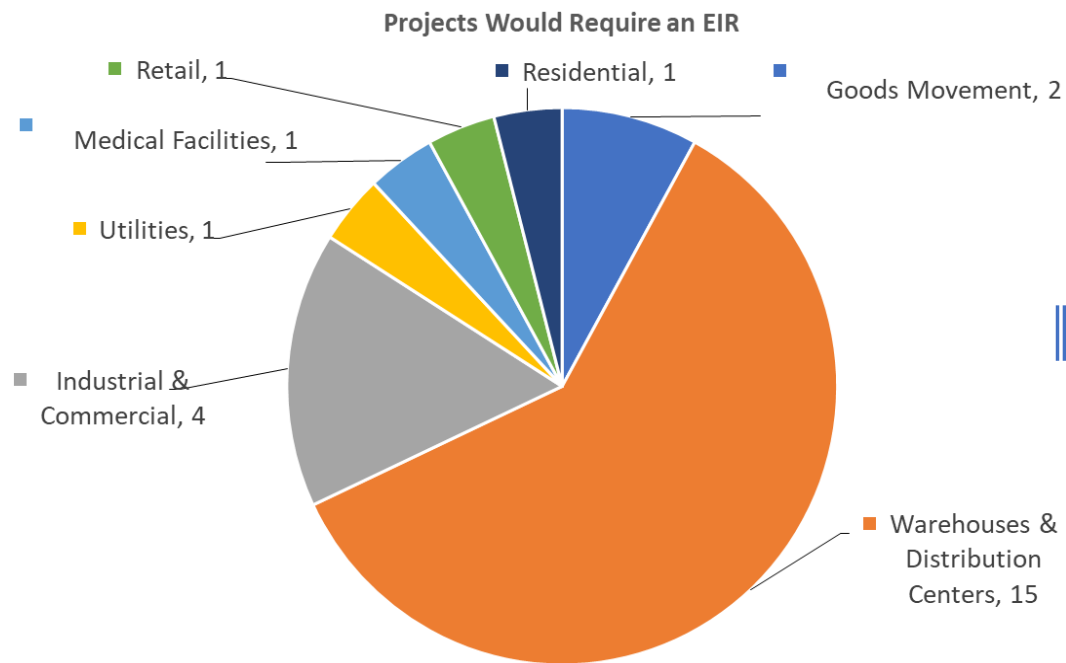
\* Land Use with a 1-year project list from June 2022 to June 2023

† Land Use with a 5-year project list from June 2018 to June 2023

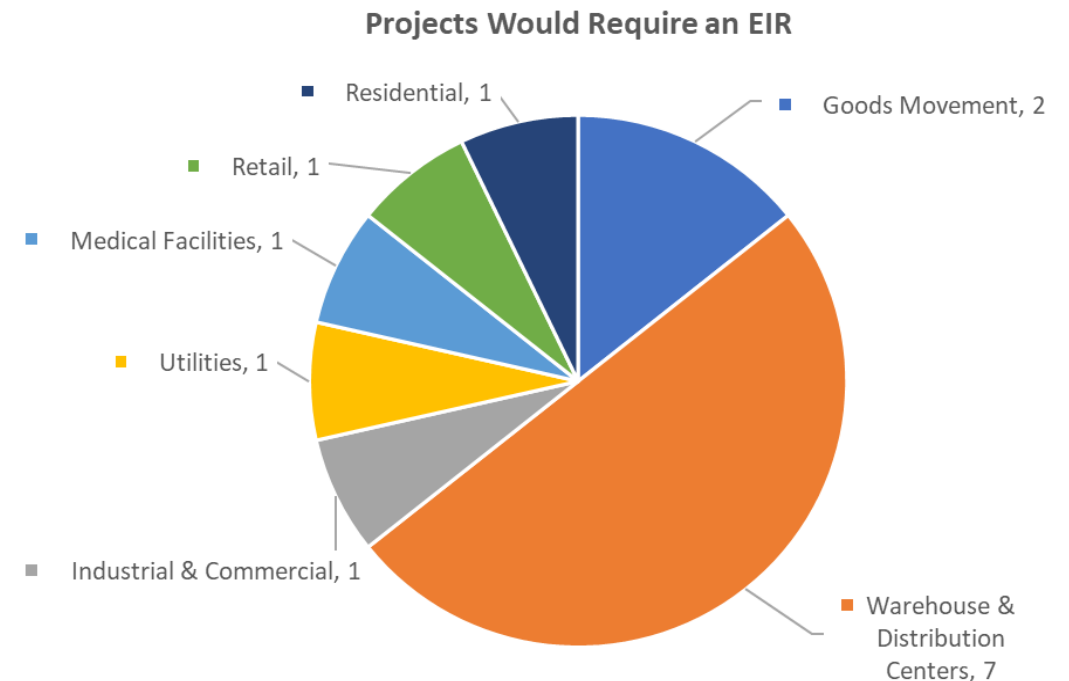


# Results of Previous versus Proposed Revised Retrospective Sensitivity Analysis

- Previously, EIRs would be required for approximately 10% of the total projects reviewed, with more than half attributed to Warehouses and Distribution Centers land use
- With the proposed revised additional criteria, EIRs would be required for approx. 6% of the total projects reviewed, with half attributed to Warehouses and Distribution Centers land use



Previous Results Presented in WGM # 5

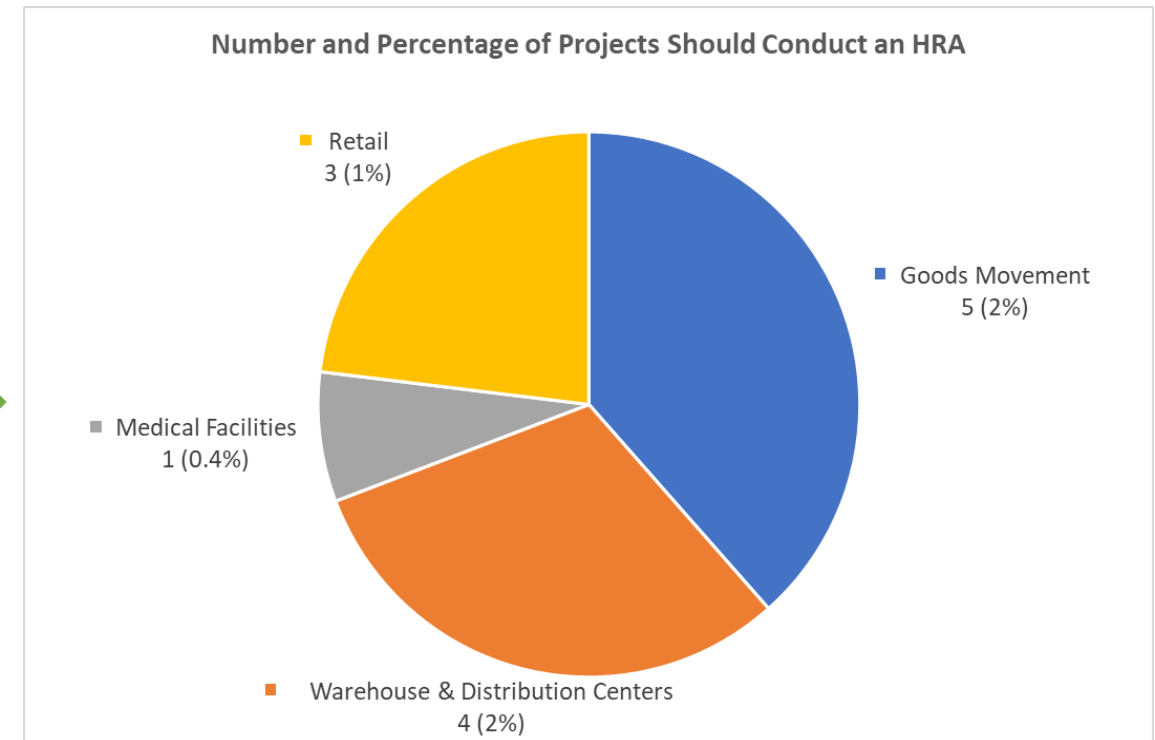
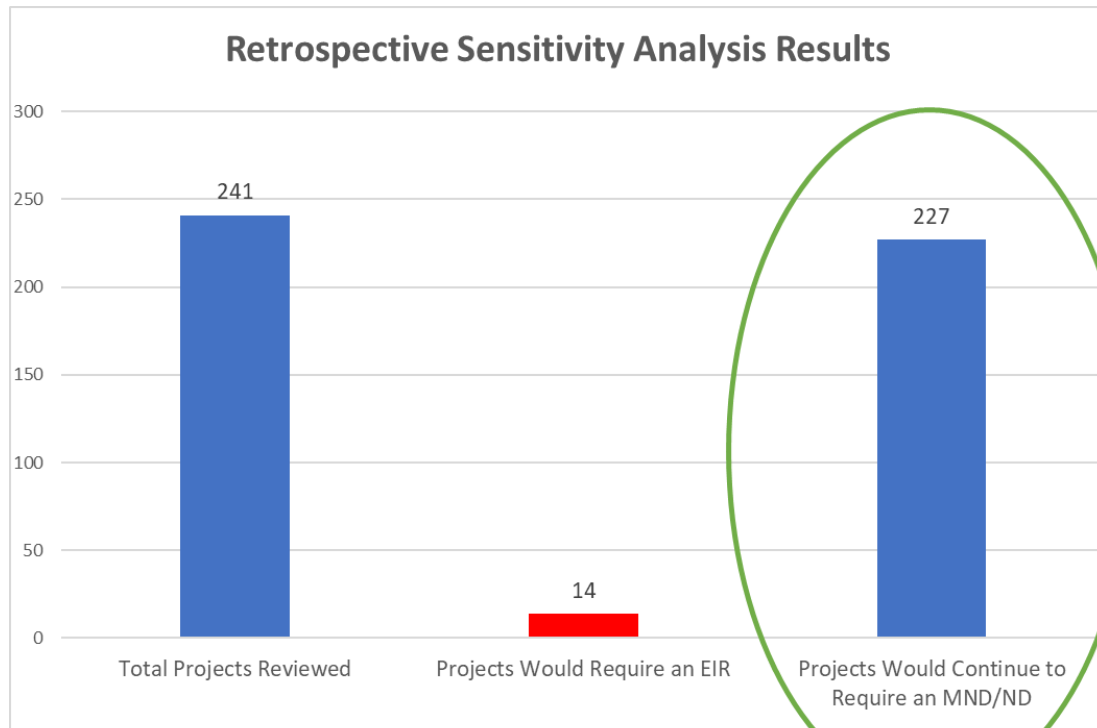


Revised Results

# Results of Proposed Revised Retrospective Sensitivity Analysis

**Out of 227 reviewed projects that would continue to require an MND/ND**

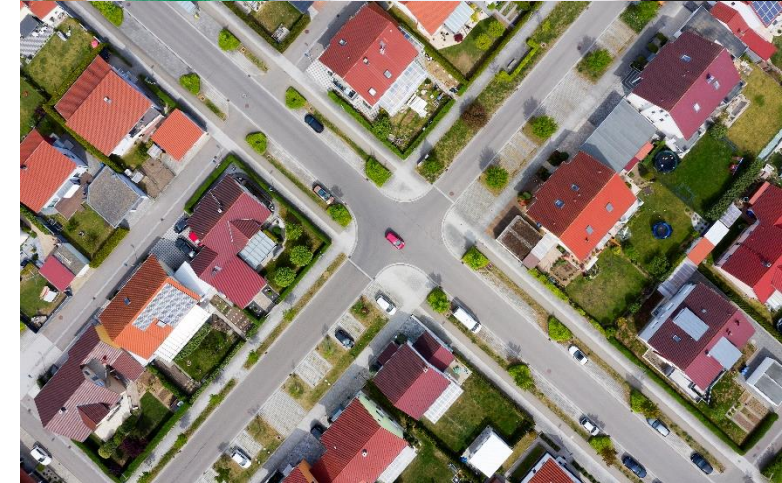
- 13 projects should conduct an HRA instead of qualitative or non-HRA analysis
- Resulting in approx. 6% more projects would need to prepare an HRA analysis
- More than half of the project that would prepare an HRA under the proposal policy are in Goods Movement and Warehouse & Distribution Centers Land Uses






# Retrospective Determination Whether An HRA Should Have Been Conducted

Factors considered in the retrospective sensitivity analysis to determine if an HRA would be needed

- Project land use types (e.g., warehouse, retail, residential, etc.)
- Project description and information (e.g., truck trips, sources and types of emission during operation)
- Location and surrounding area (e.g., industrial, residential, commercial, etc.)
- Distance to the nearest sensitive receptors
- Truck traffic and truck routes (if applicable)



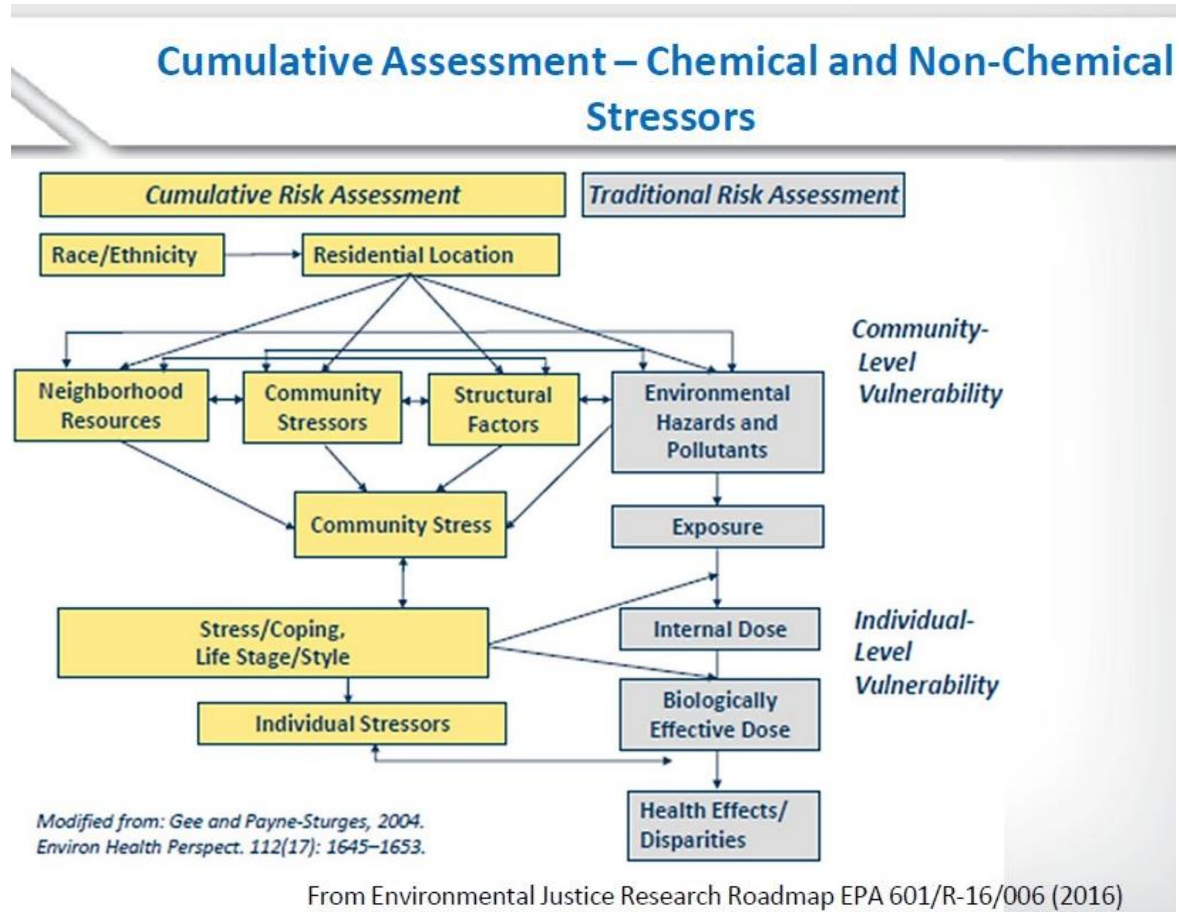
# Example of a Project That May Need an HRA

	Example 1	Example 2	Example 3
<b>Project Type</b>	Warehouse 	Residential 	Retail 
<b>Project Description in CEQA Document</b>	Develop a 164,187 sq. ft industrial building with 23 dock doors and 110 daily truck trips	Develop 118 residential units and recreational uses	Develop 3,468 sq. ft of restaurant uses
<b>Surrounding Area</b>	Residential, Commercial & Industrial	Public Park & Residential	Residential & Commercial
<b>Distance to the Nearest Sensitive Receptor</b>	< 50 ft	< 100 ft	< 100 ft
<b>Potential HRA Triggers During Operation</b>	DPM from truck trips and proximity to the sensitive receptors	None	None
<b>HRA Needed ? (Yes/No)</b>	<b>Yes</b>	<b>No</b>	<b>No</b>

# Updates from Other Agencies



# Updates From Other Agencies: U.S. Environmental Protection Agency's (U.S. EPA) Cumulative Impacts Research



## Evaluating Non-Chemical Stressors for Children's Environmental Health Protection: Workshop Summary (May 2024)<sup>1</sup>

- Summarizes 2-day virtual workshop devoted to non-chemical stressors within a chemical stressor paradigm (workshop held on October 6 & 7, 2021)
- Workshop to be used for upcoming research planning
- Research on interrelationships between chemical and non-chemical stressors and how these interactions affect health and well-being is still in its infancy
- Identified four most important non-chemical stressors (for further research) as: 1) Geography; 2) Neighborhood Environment & Characteristics; 3) Housing Stock; and 4) Racism

1. Tulse N., Eisenhauer E., Essoka J., Hahn I., Harwell M., Julius S., Mazur S., Nye M., and Shatas A. Evaluating Non-Chemical Stressors for Children's Environmental Health Protection: Workshop Summary. U.S. Environmental Protection Agency, Research Triangle Park, NC. EPA/600/R-24/082. 2024. Accessed here: <https://www.epa.gov/healthresearch/cumulative-impacts-research>

# Updates From Other Agencies: Massachusetts Department of Environmental Protection (MassDEP)

## Cumulative Impact Analysis (CIA) Regulation for Air Quality Permits

On 3/29/24 MassDEP promulgated amendments to 310 Code of Massachusetts Regulations (CMR) 7.00 *Air Pollution Control*, requiring applicants to conduct a CIA as part of a Comprehensive Plan Application (CPA) for facilities located in or near EJ populations<sup>1,2</sup>

The amendments apply to permit applications filed with MassDEP on or after 7/1/2024

CIA amendment requirements are contained in a new section, 310 CMR 7.02(14), and require an applicant to:

- Perform enhanced public outreach to and involvement of EJ populations
- Assess existing community conditions
- Analyze cumulative impacts of a proposed project

MassDEP plans to review this program within two years of the effective date of the regulations

1. Information on MassDEP's CIA in Air Quality Permitting, accessed here: <https://www.mass.gov/info-details/cumulative-impact-analysis-in-air-quality-permitting>

2. Press release found here: <https://www.mass.gov/news/massachusetts-becomes-first-state-to-require-analysis-of-cumulative-impacts-for-air-quality-permits-near-environmental-justice-populations>

# Updates From Other Agencies:

## Bay Area Air Quality Management District (BAAQMD)

### - Advisory Council Meeting<sup>1</sup>

#### **Focus: Cumulative Impact Studies**

- 5 meetings held since March 2024
- Last Meeting on October 30, 2024

#### **Key takeaways:**

- Discussed how to better address cumulative impacts in air district policies and programs, including air quality planning, CEQA, permitting, and stationary source regulations
- Identified areas for improvement in CEQA:
  - Incorporate the Air District-developed local risk methodology for PM2.5
  - Set more protective significance thresholds in overburdened and vulnerable communities
  - Incorporate consideration of synergistic effects into significance determinations for air toxics

1. 2024 BAAQMD's Advisory Council Agendas, Minutes & Media can be found at: <https://www.baaqmd.gov/en/about-the-air-district/advisory-council/agendasreports>

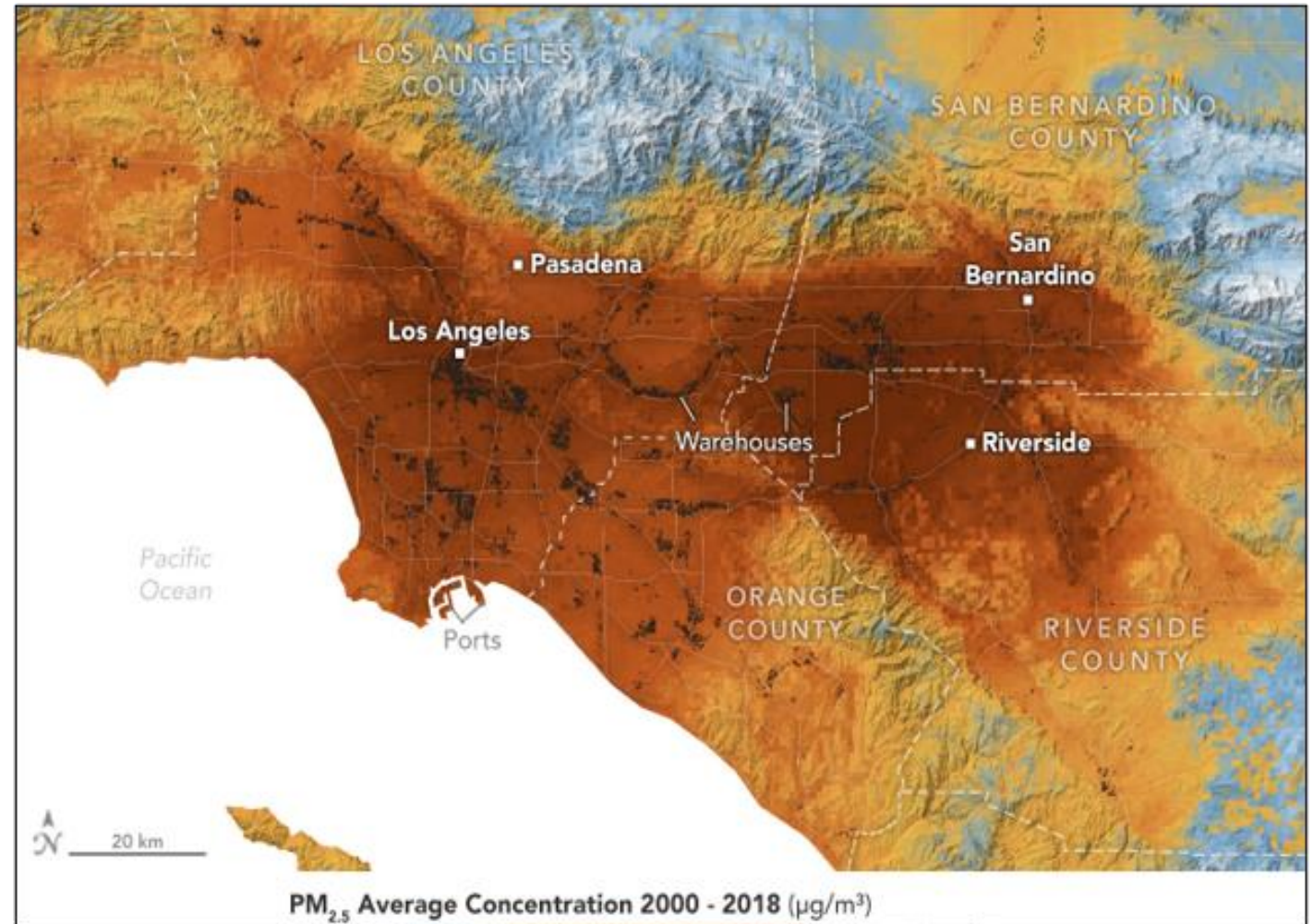


# Updates From Other Agencies: National Aeronautics and Space Administration (NASA) Study<sup>1</sup>

## NASA-Funded Study Assesses Pollution Near Los Angeles-Area Warehouses (Oct. 2024)

A data visualization shows the average PM<sub>2.5</sub> concentration in the Los Angeles region from 2000 to 2018, along with the locations of nearly 11,000 warehouses. Darker red indicates higher concentration of these toxic particles; small black circles represent warehouse locations.

1. The study from NASA can be found at: <https://www.nasa.gov/earth/nasa-funded-study-assesses-pollution-near-los-angeles-area-warehouses/>



# California Assembly Bill No. 98 (AB 98)<sup>1</sup>

Governor Gavin Newsom signed AB 98 into law on September 29, 2024.

AB 98 prescribes new regulations for logistics use developments in California, aiming to address environmental and community impacts.

**Applies to:** All new or expanded warehouse developments.

## Key requirements:

- **Warehouse design and build standards:** Includes design, location, parking, truck routing plans, zero-emissions technology, energy efficiency, truck loading bays, setbacks, landscaping buffers, entry gates, signage, and more.
- **More stringent standards:** for warehouses over 250,000 square feet and those located within 900 feet of a sensitive receptor.
- **Local agency responsibilities:** Cities, Counties, and land use agencies cannot approve non-compliant projects, may conditionally approve certain projects, enforce truck routing plans, and update general plans.
- **South Coast AQMD requirements:** Community input on penalties (ISR), mobile air monitoring systems, air modeling analysis, and reporting to the Legislature.

1. Full text of AB-98 Planning and zoning: logistics use: truck routes can be found at: [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=202320240AB98](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202320240AB98)



# Next Steps

# Seeking Feedback on South Coast AQMD Recommendations

## South Coast AQMD recommendation:

- Proceed with developing a draft guidance document to implement the proposed revised policy/methodology for analyzing cumulative impacts from air toxics

## Stakeholder feedback requested:

- Proposed revisions to cumulative significance thresholds for air toxics
- Proposed revised methodology for conducting the analysis
- Any other thoughts or concerns for consideration



# Next Steps in South Coast AQMD's Policy Development



- Prepare preliminary draft of proposed guidance
- Research and compile feasible mitigation measures and alternatives
- Continue to hold WGMs, meet with stakeholders, and hold Public Workshop
- Mobile Source Committee update in early 2025
- Public Hearing for Governing Board approval and adoption
- Provide updates on CEQA Policy Development webpage at [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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