Air Toxics, CEQA and the South Coast AQMD

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11:00 a.m. (GMT+8)

Agenda

- Overview of South Coast AQMD and Air Toxics
- California Environmental Quality Act (CEQA)
- South Coast AQMD Air Toxic Planning, Policy, and Tools
- Contacts
- *Cumulative Air Toxics Policy Development

* If time permits

South Coast AQMD

Cleaning The Air That We Breathe...

- Local air pollution control agency
  - Largest of the 35 local air agencies in CA and in the U.S.
  - 10,743 square miles
  - 17 million residents
- Key Responsibilities
  - Regulate emissions from stationary sources
  - Develop and implement plans to meet air quality standards
  - Permit and inspect 28,400 affected businesses
  - Administer over $200 million of incentive funding annually

How Does South Coast AQMD Address Environmental Impacts From Air Toxics?

Evaluation of Environmental Impacts via California Environmental Quality Act (CEQA)

Air Toxics Rules and Regulations and Permitting (Regulation XIV – Toxics and Other Non-Criteria Polluants, T-BACT, etc)

Air Toxics Emissions Inventory, Risk Assessment and Public notification of Potential Health Risks (AB 2588 - Air Toxics "Hot Spots")

Air Toxics Monitoring and Multiple Air Toxics Exposure Study (MATES)

Environmental Justice (AB 617 Community Emission Reduction Plans and Community Monitoring)

Annual Emissions Reporting (AER) and Fees Program

What is CEQA?

California Environmental Quality Act (CEQA) was adopted in 1970 *

- Inform government decision-makers and the public of potential significant effects of projects
- Identify ways to avoid or reduce adverse impacts
- Require feasible alternatives and mitigation measures to prevent significant environmental damage
- Balance with other public interests, and disclose why a project is approved notwithstanding its unavoidable, significant environmental impacts
- Disclose to the public why a project was approved
- Primary CEQA Goals

Disclosure

- Require public disclosure of the environmental impacts of proposed projects to foster informed public comment and public agency decision-making about whether and under what circumstances to approve such projects.

Minimize Environmental Impacts

- Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so. *[Public Resources Code Section 21002.1.]*

* Codified in Public Resources Code (PRC) Sections 21000 et seq. and CEQA Guidelines Section 15000 et seq.

When Does CEQA Apply?

- Activities that require a public agency's discretionary approval (e.g., exercise judgement or deliberation):
  - Projects undertaken or funded by a public agency
  - Issuance of a permit or other approval by a public agency for private projects
- A project is an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment
- Discretionary is defined as "a project which requires the exercise of judgment or deliberation when the public agency or body decides to approve or disapprove a particular activity, as distinguished from situations where the public agency or body merely has to determine whether there has been conformity with applicable statutes, ordinances, or regulations." [*CEQA Guidelines Section 15357*.]

What is in a CEQA Document?

- Identify the Project (Project Description)
- Establish a Baseline
- Evaluate post-project conditions*
- Determine the impacts of the project compared to baseline (existing conditions)
- Determine if the project will cause impacts that exceed a significance threshold
- Identify mitigation measures and project alternatives that could reduce or avoid the significant environmental effects
- Determine if any significant environmental effects remain after mitigation
- Consider whether there are other benefits of the project that outweigh the environmental impacts

Aesthetics	Hydrology & Water Quality*
Agriculture & Forestry Resources	Land Use & Planning
Air Quality	Mineral Resources
GHG Emissions	Noise
Biological Resources	Population & Housing
Cultural & Tribal Cultural Resources	Public Services
Energy*	Recreation
Geology & Soils	Solid & Hazardous Waste*
Hazards & Hazardous Materials*	Transportation*
Utilities & Service Systems	Wildfire
	Mandatory Findings of Significance

*topics with possible air quality-related impacts

South Coast AQMD's Three Roles Under CEQA

South Coast AQMD's Responsibilities with Each Role

LEAD AGENCY

- Oversees preparation of CEQA document
- Primary approval authority over rule development, plan, and air permit projects
- Coordinates with Responsible Agency(ies) on contents of CEQA document
- Executive Officer adopts or certifies the CEQA document and approves project and issues air permit(s)

RESPONSIBLE AGENCY

- Agency other than Lead Agency with approval authority for permits over project
- Conducts independent review of CEQA document, with focus on air quality/GHG analyses
- Provides input on contents, analysis, regulatory compliance, and mitigation measures
- Responsible Agency can, but not required to, rely on Lead Agency's certified/adopted
- CEQA document needs to be certified/adopted by Lead Agency in order to issue air permit(s)

COMMENTING AGENCY

- No approval authority over project
- Review CEQA documents prepared by other agencies and advise on the adequacy of the air quality/GHG analyses and regulatory compliance
- Recommend mitigation measures
- Prepare comment letter as necessary

What is South Coast AQMD's Focus of IGR Review?

Focus of IGR review examines whether there are:

- Potentially significant adverse regional air quality and greenhouse gas impacts (e.g., special event centers/stadiums, landfills, goods movement)
- Potentially significant localized air quality impacts (e.g., warehouse and distribution centers)
- Environmental justice concerns
- Air permits required but another public agency is Lead Agency

Key Focus of Comment Letters

If South Coast AQMD decides that a comment letter regarding a CEQA or other type of environmental document is necessary, the nature of the remarks may focus on:

- **Identifying Discrepancies**: Highlighting any discrepancies or inconsistencies in the analysis.
- **Assumptions Made, Calculations and Analysis**: Reviewing the assumptions and verifying the accuracy of the calculations of the air quality and greenhouse gas analyses and the modeling parameters and results of the health risk assessment.
- **Air Permit Requirements**: Identifying whether a South Coast AQMD air permit is needed and whether South Coast AQMD may be a Responsible Agency under CEQA.
- **Mitigation Measures and Alternatives:** Recommending mitigation measures and alternatives to reduce air quality and greenhouse gas impacts.

Examples of Recommended Mitigation Measures

Construction Activities

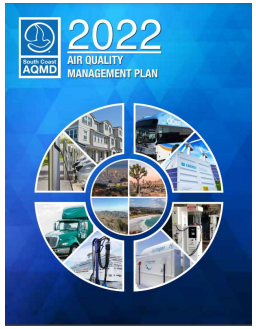
- Use of electric or alternative-fueled (i.e., non-diesel) construction equipment
- Use of 2014 and newer haul trucks
- Use of Tier 4/5 or higher for off-road construction equipment
- For long range construction projects, commit to using Zero Emission (ZE) or Near Zero Emission (NZE) off-road construction equipment

Warehouse Projects

- Require future use of ZE or NZE heavy-duty trucks by future development projects
- Provide overnight truck parking inside the future development project site to limit truck parking near sensitive receptors
- Design check-in point for trucks inside project site to ensure that no trucks queue/idle outside

Examples of Projects Subject to CEQA

- Rule Development – adoption or amendment of rules and regulations
- Plans – Air Quality Management Plans (AQMP), General Plans* & Master Plans*
- Industrial* – New construction/modifications of facilities such as refineries, utilities, gas stations etc. (air permits required)
- Land Use* – New construction/modifications of residential, commercial, and retail properties (air permits not typically required)



* These are the ones we see mostly as commenting agency role

Comment Letters for Noteworthy Projects

Project Title	Lead Agency	Type of Document	Link to Comment Letter
Moreno Valley Mall Redevelopment	City of Moreno Valley	Draft Environmental Impact Report (EIR)	www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/january-2023/RVC221206-08.pdf
Airport Gateway Specific Plan (warehouses)	Inland Valley Development Agency	Draft EIR	www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/february-2023/SBC221213-08.pdf
California High-Speed Rail System Palmdale to Burbank Project Section	California High-Speed Rail Authority	Draft EIR/Environmental Impact Statement (EIS)	www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/november/LAC220901-10.pdf
Ion Exchange Treatment Plant 7991 Replacement Project	Coachella Valley Water District	Mitigated Negative Declaration (MND)	www.aqmd.gov/docs/default-source/ceqa/comment-letters/2021/september/RVC210824-04.pdf
Parcel 778-020-007	Department of Toxic Substances Control	Draft Removal Action Workplan	www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/april/RVC220324-05.pdf

Statistics Re: South Coast AQMD's CEQA Roles

- The South Coast AQMD maintains an internal CEQA database which compiles statistics pertaining to:
  - ❑ Number of CEQA and other types of environmental documents received for review
  - ❑ Type of land use and Project Description
  - ❑ Project location (address and county) plus whether project is located in an environmental justice area
  - ❑ Lead Agency name, dates of the public comment period and public hearing
  - ❑ Status of review, including whether written comments were transmitted to a Lead Agency and the location where the comment letter may be accessed on South Coast AQMD's website, as applicable
  - ❑ Whether staff testified at a hearing

Monthly Report Re: South Coast AQMD's CEQA Roles

- Statistics from South Coast AQMD's internal CEQA database are compiled in a monthly report "**Intergovernmental Review of Environmental Documents and CEQA Lead Agency Projects"**
- Monthly written report is organized into three sections:
  - ❑ Attachment A lists all environmental documents prepared by other public agencies seeking IGR review by South Coast AQMD that were received during the reporting period
  - ❑ Attachment B lists the active projects for which South Coast AQMD has reviewed or is continuing to conduct an IGR review of the environmental documents prepared by other public agencies
  - ❑ Attachment C lists the active air permit projects for which South Coast AQMD is a Lead Agency

Significance Criteria

Under CEQA, Lead Agency establishes significance criteria to determine if a project would cause a significant adverse effect.

For example, an evaluation of air quality impacts considers whether a project would:

- Conflict with the air quality plan
- Violate any air quality standard
- Result in a cumulatively considerable increase of any criteria pollutant for which the project region is in non-attainment
- Expose sensitive receptors to substantial pollutant concentrations
- Create objectionable odors affecting a substantial number of people

South Coast AQMD Significance Thresholds

Regional Air Quality Thresholds

- For Construction and Operation

Toxic Air Contaminant Thresholds

- Health Risk Assessment

Localized Air Quality Thresholds

- For Construction and Operation

South Coast AQMD's CEQA Air Quality Thresholds - Details

SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds [a]		
Pollutant	**Construction [b]**	**Operation [c]**
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
SOx	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TACs), Odor, and GHG Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Chronic & Acute Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO2eq for industrial facilities	

South Coast AQMD
Localized Significance Thresholds (LST)

LSTs established as voluntary guidance

- Simplified method that avoids complex dispersion modeling for projects <5 acres in size and a maximum receptors distance up to 500m
- Limited to onsite sources
- Based on daily emissions levels and Source-Receptor Area (SRA) map
- A template dispersion modeling analysis was conducted for each SRA which resulted in max emissions allowed
- LST look-up tables for NOx, CO, PM10 and PM2.5
- LST tables are in the process of being updated
- For projects larger than 5 acres, localized air quality impacts need to be modeled

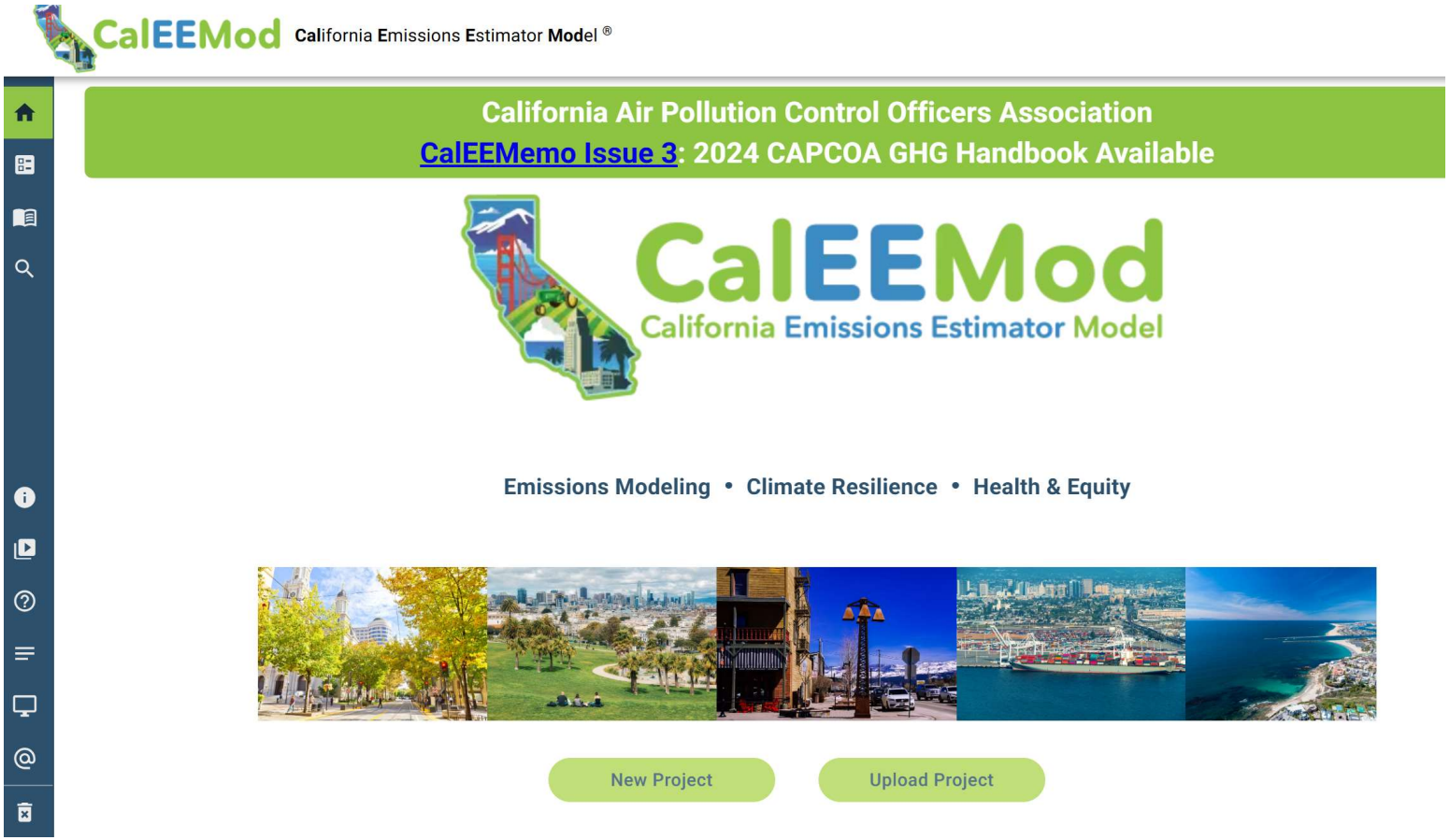
Ambient Air Quality Standards (AAQS) – Localized Air Quality Impacts

Pollutant	Averaging Time	California Standards [1]		National Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Respirable Particulate Matter (PM10)[9]	24 Hour	50 µg/m^3	Gravimetric or Beta Attenuation	150 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m^3		—		
Fine Particulate Matter (PM2.5)[9]	24 Hour	—	—	35 µg/m^3	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m^3	Gravimetric or Beta Attenuation	9.0 µg/m^3	15.0 µg/m^3	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m^3)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m^3)		9 ppm (10 mg/m^3)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m^3)		—	—	
Nitrogen Dioxide (NO_2)[10]	1 Hour	0.18 ppm (339 µg/m^3)	Gas Phase Chemiluminescence	100 ppb (188 µg/m^3)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)		53 ppb (100 µg/m^3)	Same as Primary Standard	

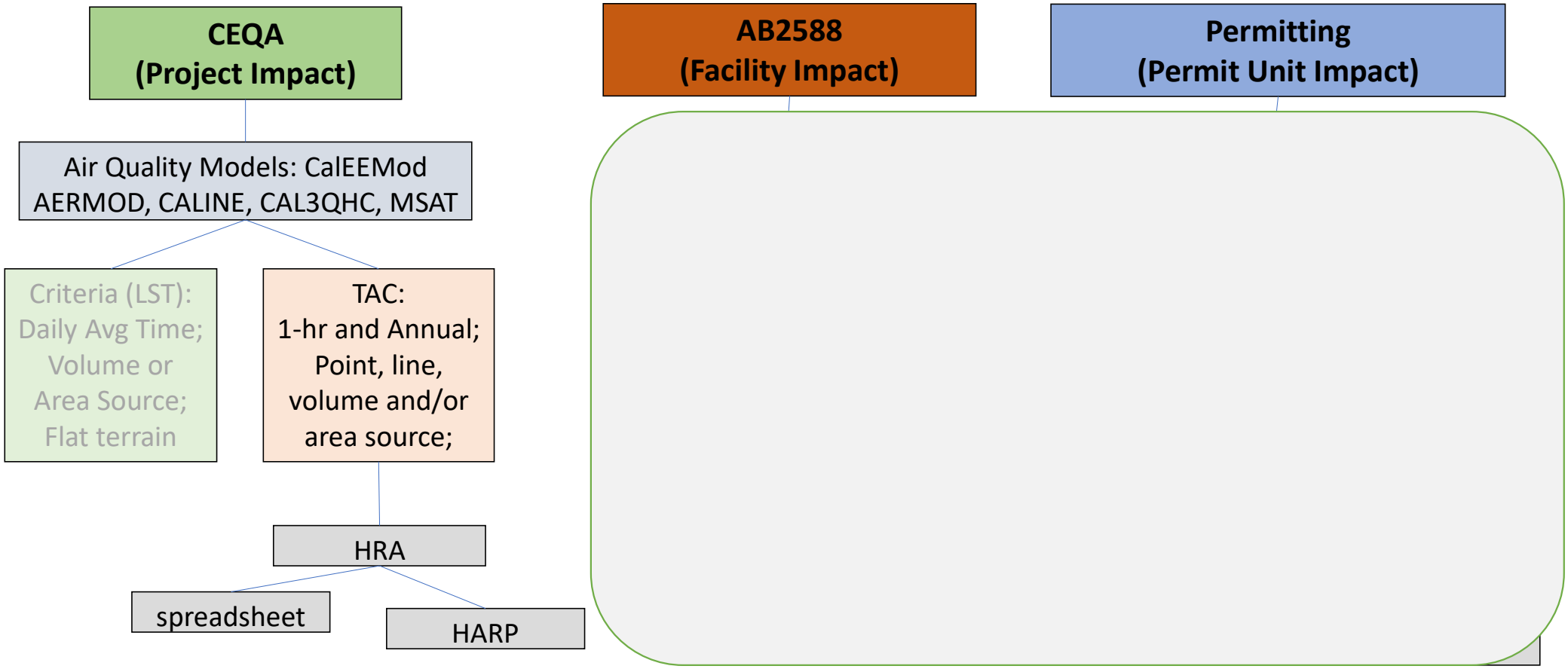
Other Air Quality Analysis Resources

- California Emissions Estimator Model (CalEEMod)
- Emission Factors
  - Off-Road - OFFROAD Model Mobile Source Emission Factors (CARB)
  - On-Road - EMFAC Emission Factors (CARB)
  - Toxic Emission Factors from Combustion Sources
- Air Toxics Analysis
  - Mobile Source Toxics Analysis
  - Risk Assessment Procedures for Rules 1401 and 212
- Air Quality Guidance for General Plans, Local Planning, and School Siting
  - Guidance Document for Addressing Air Quality Issues in General Plans, Local Planning, and School Siting
- Mitigation Measures
  - Mitigation Measures and Control Efficiencies
  - CAPCOA - Quantifying Greenhouse Gas Mitigation Measures
- CEQA Policy Development
- Links to Other Environmental Sources

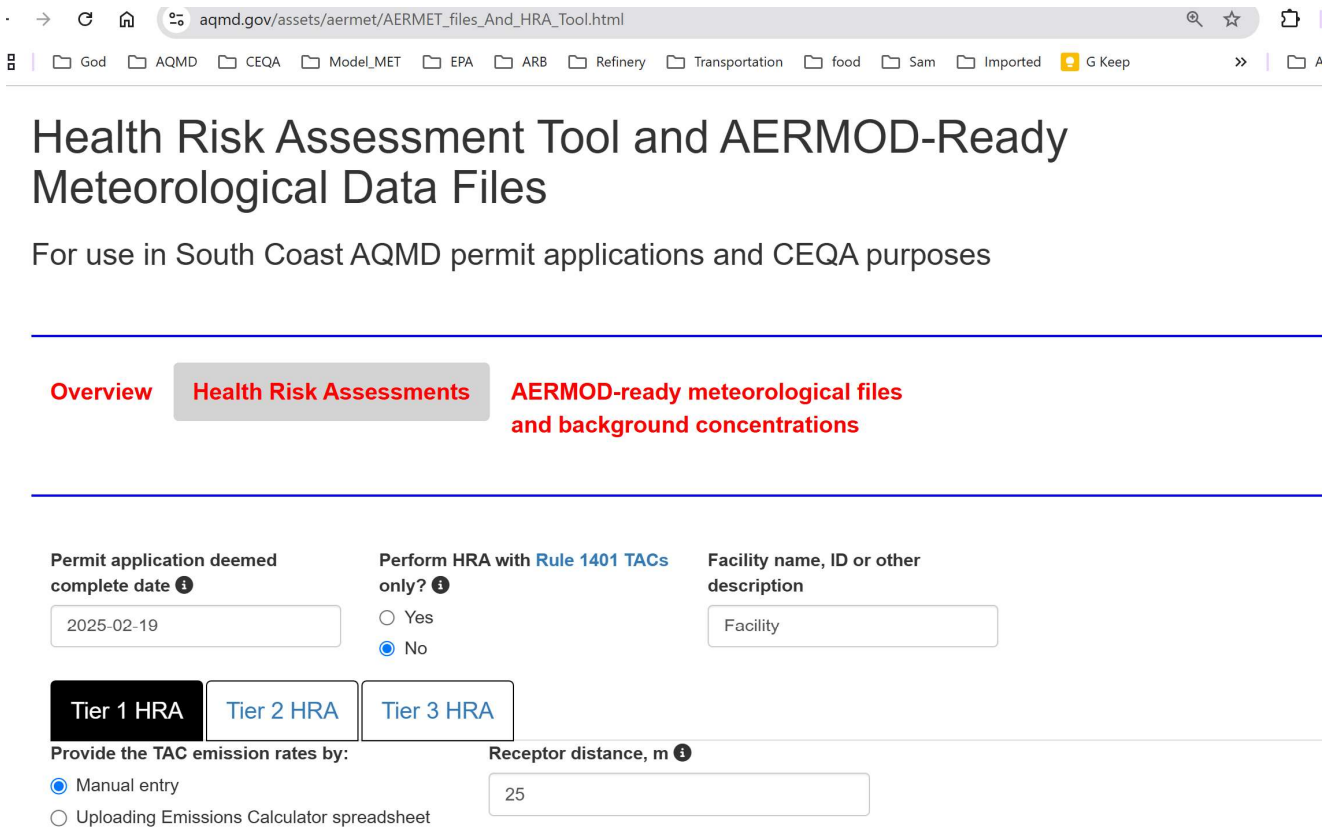
CalEEMod


CalEEMod
California Emissions Estimator Model ®
California Air Pollution Control Officers Association
CalEEMemo Issue 3: 2024 CAPCOA GHG Handbook Available
CalEEMod
California Emissions Estimator Model
Emissions Modeling • Climate Resilience • Health & Equity
New Project
Upload Project

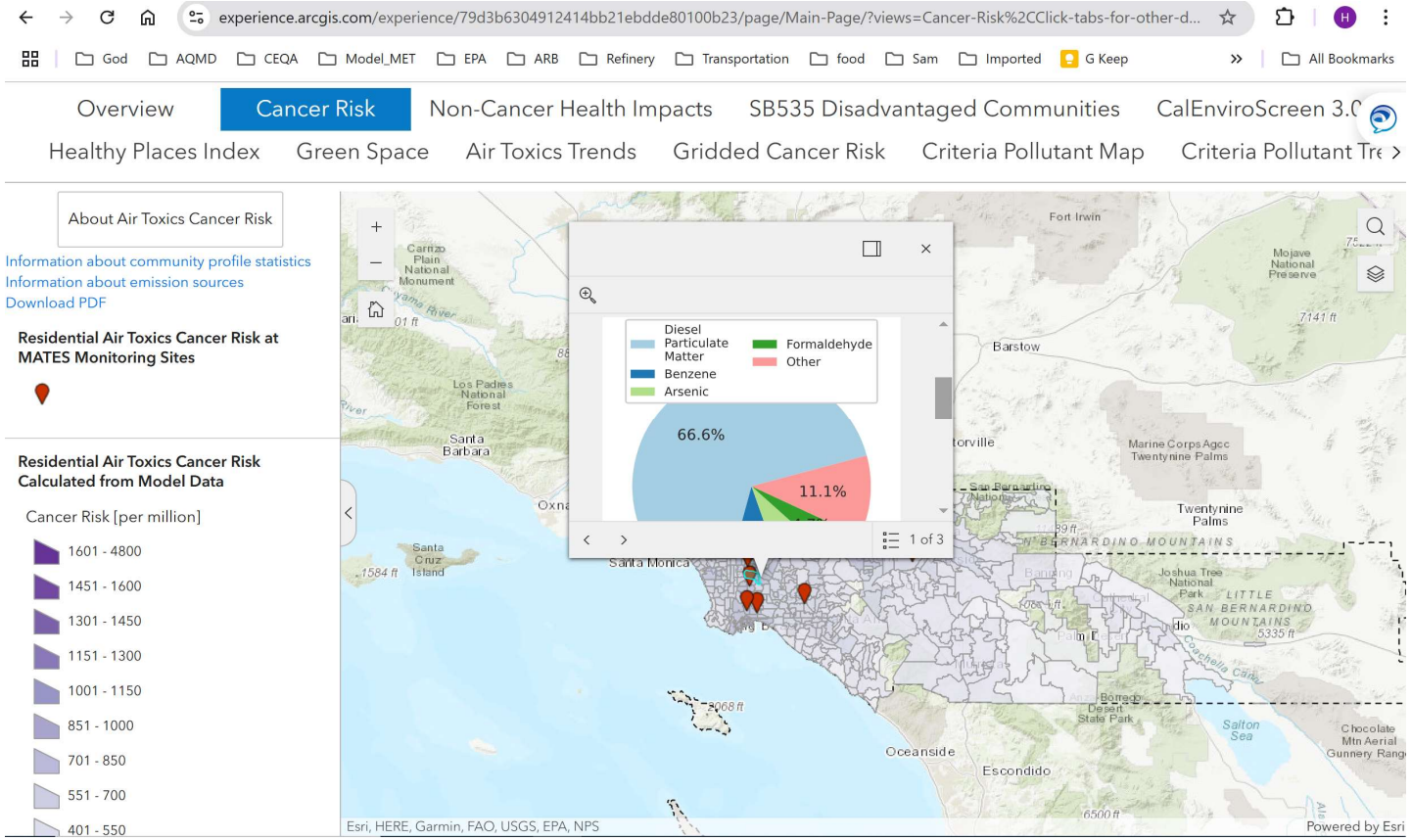
Tools for Quantifying Air Emissions and Assessing Risks



Modeling Tools



Background Risks – Multiple Air Toxics Exposure Study (MATES)



South Coast AQMD's CEQA Resources

- Main CEQA homepage: http://www.aqmd.gov/home/rules-compliance/ceqa
- South Coast AQMD's Air Quality Analysis Handbook: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook
- IGR comment letters: https://www.aqmd.gov/home/rules-compliance/ceqa/commenting-agency/comment-letters-year-2025
- Governing Board Agenda Item "Lead Agency Projects and Environmental Documents Received" provides monthly status report on projects undergoing CEQA review: http://www.aqmd.gov/home/news-events/meeting-agendas-minutes
- CEQA documents for when South Coast AQMD is Lead Agency:
  - Rule Development projects: http://www.aqmd.gov/home/library/documents-support-material/lead-agency-scaqmd-projects
  - Air Permit projects: http://www.aqmd.gov/home/research/documents-reports/lead-agency-permit-projects
- Sign up to receive CEQA updates: http://www.aqmd.gov/sign-up

Contacts

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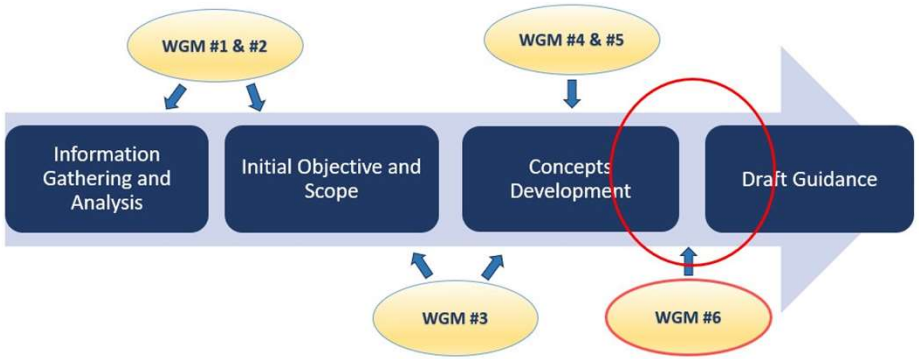
Sign up for CEQA Updates at:

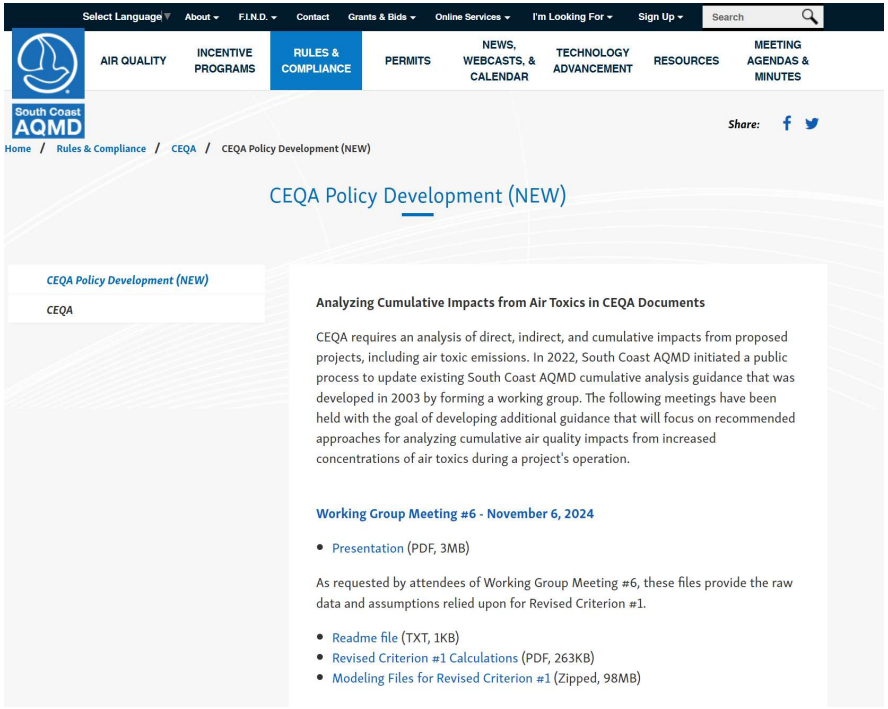
https://www.aqmd.gov/sign-up

CEQA Policy Development

CEQA requires analysis of direct, indirect, and cumulative environmental impacts

- 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, six 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)





Why Analyze Cumulative Impacts to Air Toxics?

CEQA requires analysis of direct, indirect, and cumulative environmental impacts[1]

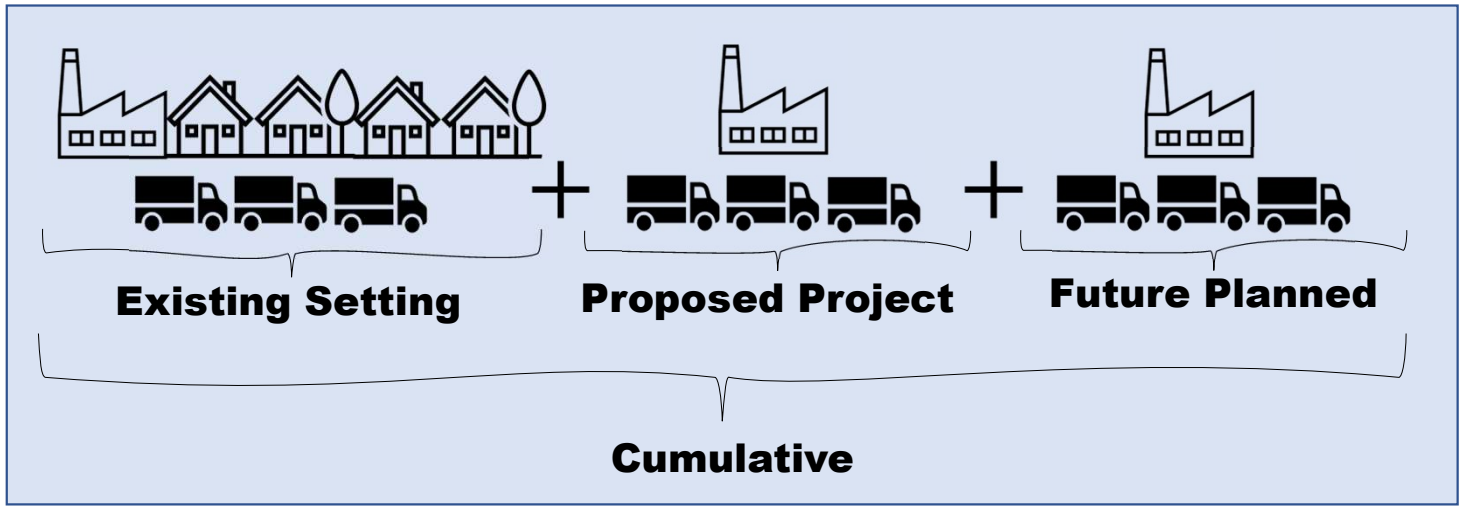
Need for Additional Guidance	Policy Goals	Policy NOT Intended To
• Opportunity to update existing South Coast AQMD cumulative analysis guidance that was developed in 2003[2] • CEQA lawsuit by California Department of Justice in 2021[3] • Community concerns about high health risk impacts from air toxics, particularly from aggregation of warehouses • **South Coast AQMD has initiated policy development to evaluate cumulative air quality impacts from increased concentrations of toxics during project operation**	Provide streamlined guidance that: • Serves as a tool Lead Agencies can rely upon to make informed decisions on projects with potential for cumulative air toxics • Promotes health equity • Addresses community concerns and provides information on a project's potential cumulative health impact	• Delay or stop proposed projects • Automatically assume that all air toxics impacts are cumulatively considerable • Require Environmental Impact Reports (EIRs) for all proposed projects

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 [1]

- A project's incremental effect on the environment, though individually limited, may be *cumulatively considerable*[2]



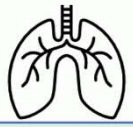
- Cumulatively Considerable – when incremental effects of an individual project are significant when viewed in connection with effects of past, other current, and probable future projects[3]

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

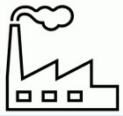
Proposed Policy Considers Key Project Features

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)

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)[1]

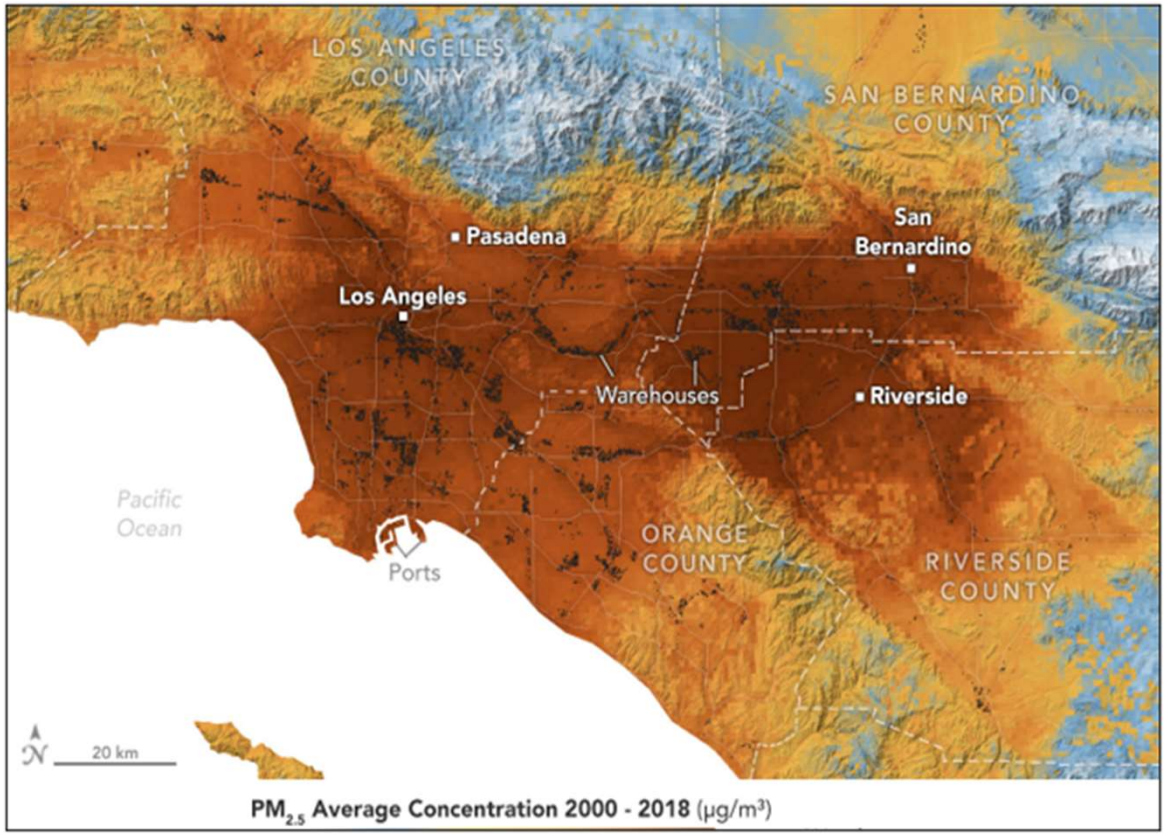
- Summarizes 2-day virtual workshop devoted to non-chemical stressors within a chemical stressor paradigm (workshop held on October 6 & 7, 2021)
- Workshop to be used for upcoming research planning
- Research on interrelationships between chemical and non-chemical stressors and how these interactions 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. Tulve 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

National Aeronautics and Space Administration (NASA) Study [1]

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

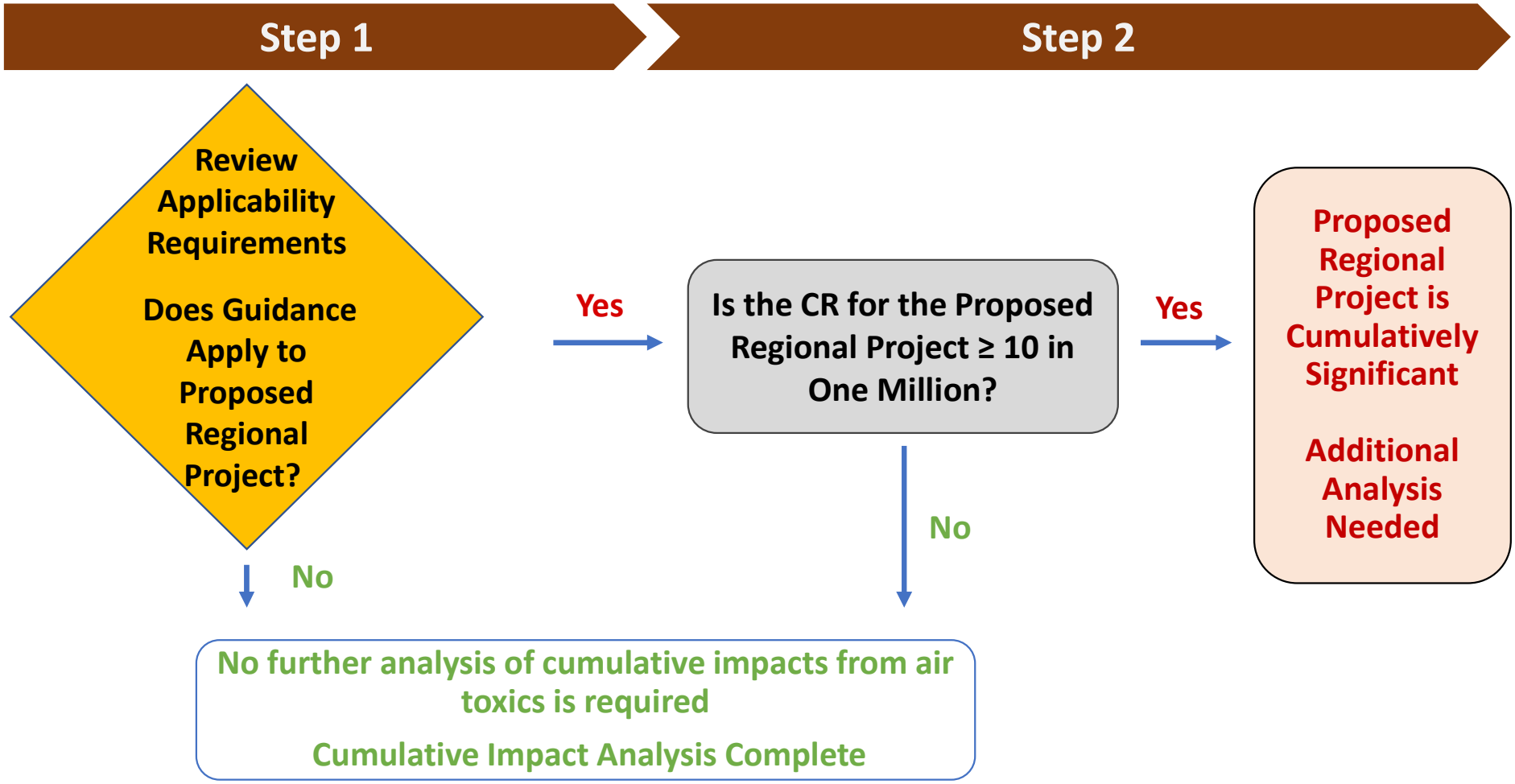
A data visualization shows the average PM2.5 concentration in the Los Angeles region from 2000 to 2018, along with the locations of nearly 11,000 warehouses. Darker red indicates higher concentration of these toxic particles; small black circles represent warehouse locations.



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

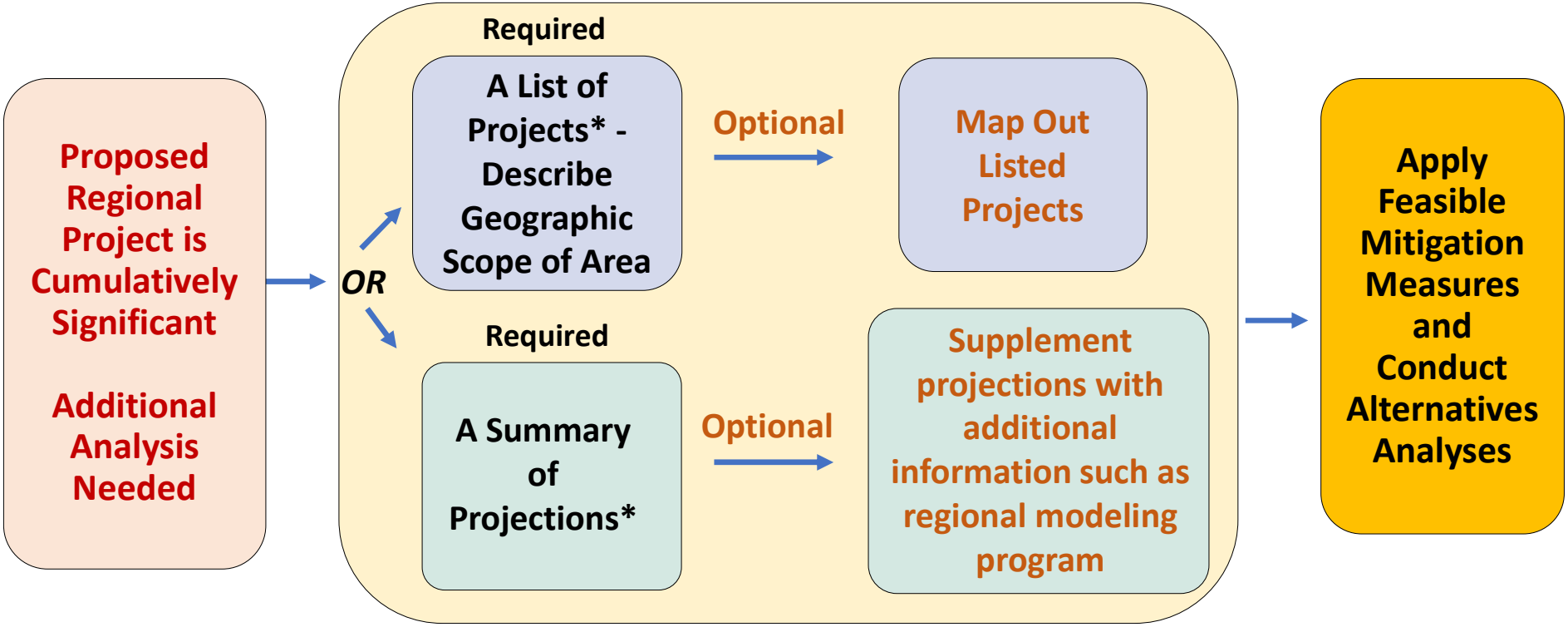
Proposed Process for Regional Projects Analysis

Recap of Process for Analyzing Regional Projects



Recap of Process for Analyzing Regional Projects

Reminder

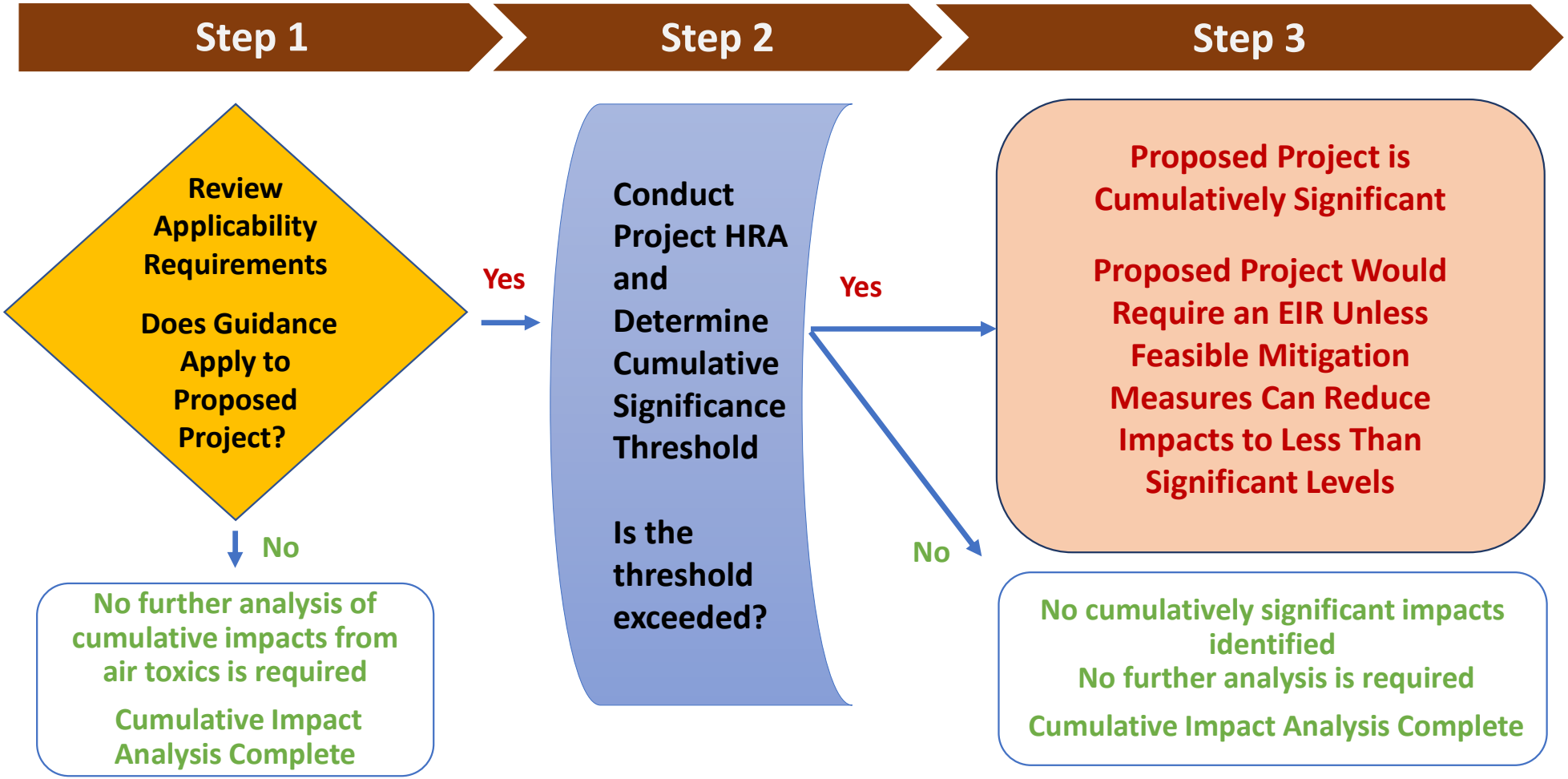


Describe Severity of Cumulative Significant Impacts Via a Qualitative Analysis

*CEQA Guidelines Section 15130(b)

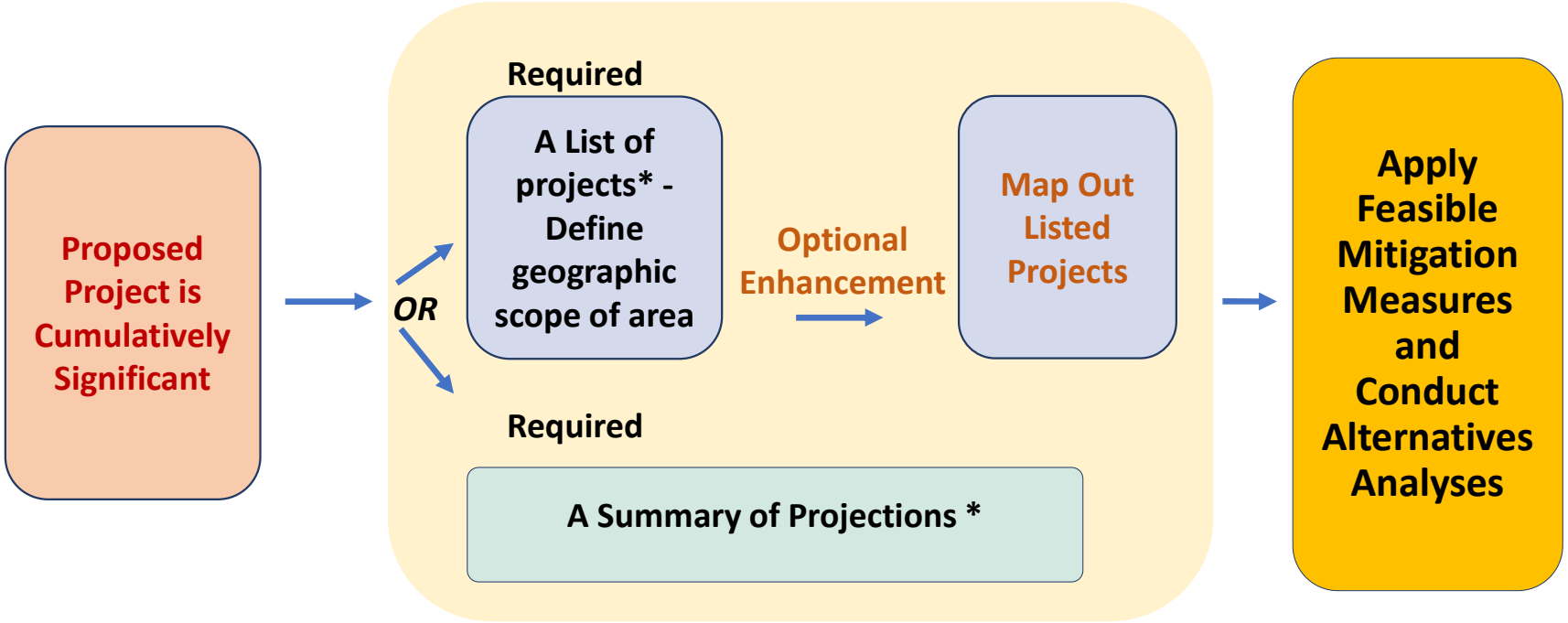
Proposed Process for Project-Level Analysis

Proposed Revised Process for Project-Level Analysis



Proposed Revised Process for Project-Level Analysis

Reminder



Describe Severity of Cumulative Impacts via Qualitative Analysis

*CEQA Guidelines Section 15130(b)

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

Proposed Initial Threshold

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

* Most current MATES V is based on 2018 data

Proposed Additional Criteria (to Adjust Stringency)

	Proposed Revised Additional Criteria
#1	**Post-2018 Projects with High Volume Diesel –fueled Trucks** Along Proposed Project's truck route†
#2	**Health Sensitive Population** Either within SB535 or AB 617 areas

Step 2

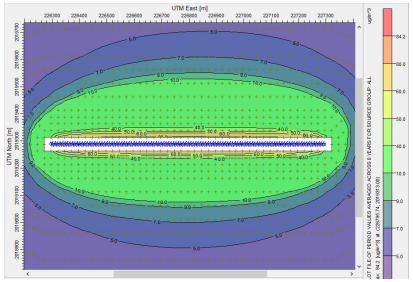
Cumulative Significance Threshold

- 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 Additional Criterion #1 and #2

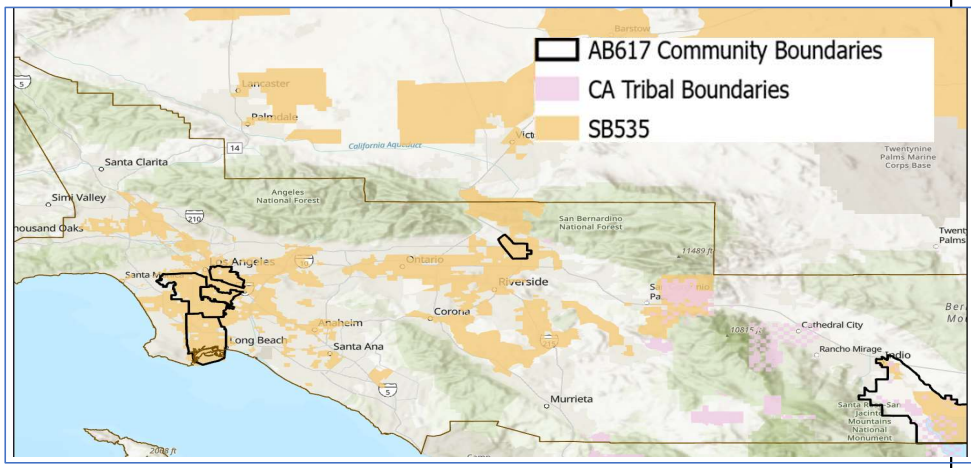
High Volume Diesel-Fueled Trucks Along Route to Freeway

- 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 (µg/m^3)
  - **951 one-way trips/day**



AB 617 and SB535 Disadvantaged Communities because:

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



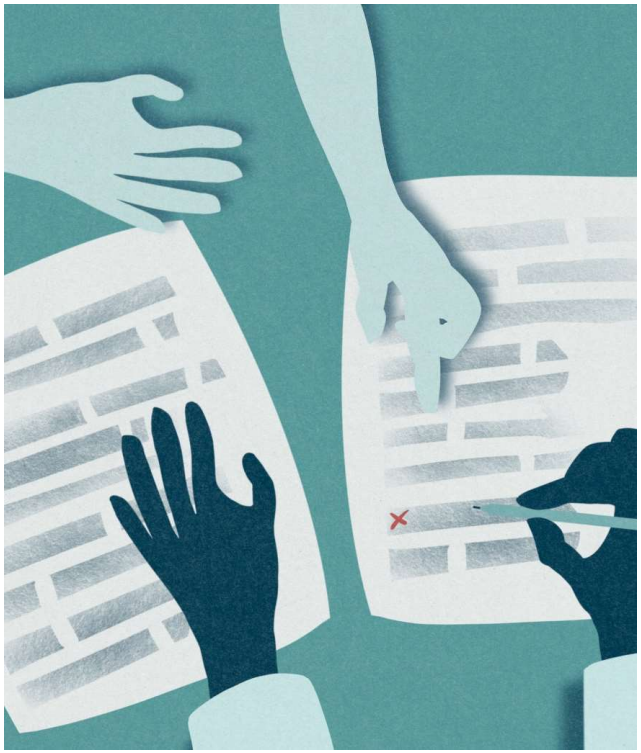
Maps provided by South Coast AQMD

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]

Example of a Project That May Need an HRA

	Example 1	Example 2	Example 3
Project Type	Warehouse 	Residential 	Retail 
Project Description in CEQA Document	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
Surrounding Area	Residential, Commercial & Industrial	Public Park & Residential	Residential & Commercial
Distance to the Nearest Sensitive Receptor	< 50 ft	< 100 ft	< 100 ft
Potential HRA Triggers During Operation	DPM from truck trips and proximity to the sensitive receptors	None	None
HRA Needed ? (Yes/No)	**Yes**	**No**	**No**

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 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)

Air Quality Analysis Considerations in CEQA

Regional vs. Local	LST and AAQS	Construction and Operation Impacts	Onsite and Offsite Impacts
Sources and Receptors	Baseline vs. Post-Project	Averaging Times and Concentrations	GLC and background
Pollutants: Criteria, Toxics and GHGs	Exhaust, idling, fugitive, evaporative	Permit and Rule Compliance	CEQA document type