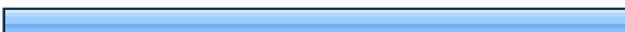


1. Answers to the survey are anonymous. If you wish, please provide the following:

		Response Percent	Response Count
Name:		98.3%	57
Agency:		96.6%	56
Email Address:		94.8%	55
		answered question	58
		skipped question	19

2. As a lead agency, do you use the Air District's 2010 CEQA thresholds of significance when performing environmental review? Please check all that apply.

		Response Percent	Response Count
Criteria air pollutants thresholds of significance		100.0%	73
Greenhouse gas (GHG) thresholds of significance		97.3%	71
Risk and hazards thresholds of significance		75.3%	55
If no, have you developed your own air quality thresholds that you use? Please describe.			7
		answered question	73
		skipped question	4

3. Since June 2010, have you found that potential air quality impacts ALONE have triggered the need for a DEIR during the Initial Study process (i.e., air quality is the sole reason for preparing a DEIR)?

		Response Percent	Response Count
Yes		19.5%	15
No		80.5%	62
answered question			77
skipped question			0

4. If you answered yes, you have found that potential air quality impacts ALONE are the sole purpose in preparing a DEIR, provide the project(s) name below.

		Response Percent	Response Count
I answered no.		75.3%	58
Project names:		24.7%	19
answered question			77
skipped question			0

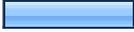
5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

		Response Percent	Response Count
Urbemis and BGM		75.4%	46
Roadway and Highway Screening Tables for Risk and Hazards		54.1%	33
Stationary Source Risk and Hazard Analysis Tool (Google Earth tool)		44.3%	27
Risk and Hazard Modeling Methodology Report		39.3%	24
Construction Risk and Hazard Analysis		42.6%	26
CAPCOA GHG Mitigation Quantification Report		36.1%	22
GHG Plan Level Quantification Guidance		44.3%	27

Are there any other tools or resources you would like the Air District to provide? 25

answered question	61
skipped question	16

6. Do you believe that the Air District's thresholds increase the challenges associated with infill development? Please check all that apply.

		Response Percent	Response Count
Yes, the risk and hazard thresholds do.		61.1%	44
Yes, the criteria air pollutant thresholds do.		40.3%	29
Yes, the GHG thresholds do.		50.0%	36
No, I do not believe the thresholds increase the challenges associated with infill development.		19.4%	14

If yes, please describe why you believe infill development is made more challenging and how the District could address these challenges: 44

answered question	72
skipped question	5

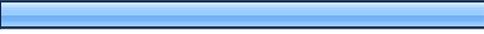
7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

	Response Count
	40
answered question	40
skipped question	37

8. What, if anything, do you find confusing or unclear about the 2010 CEQA Guidelines?

	Response Count
	36
answered question	36
skipped question	41

9. Which elements, outlined below, of the 2010 CEQA Guidelines do you find helpful? Please check all that apply.

		Response Percent	Response Count
The thresholds provide the legal certainty and justification for significance determinations.		62.5%	40
Guidance on sound air quality analysis methodologies for evaluating potential air impacts.		53.1%	34
Guidance on useful mitigation measures.		59.4%	38
The various tools, technical support and documents (i.e. screening tables, Urbemis, etc.) to evaluate potential air impacts.		73.4%	47
	Other (please describe):		17
	answered question		64
	skipped question		13

10. Would additional training sessions from the Air District on the CEQA Guidelines or our analytical tools be helpful? If yes, on what topic(s)?

		Response Percent	Response Count
Yes		79.4%	54
No		20.6%	14
	Please explain:		41
	answered question		68
	skipped question		9

11. Please provide any additional questions or comments on the 2010 CEQA Guidelines:

	Response Count
	28
answered question	28
skipped question	49

Q1. Answers to the survey are anonymous. If you wish, please provide the following:

Name:		
1	Rob Eastwood	May 5, 2011 4:21 PM
2	Scott Briggs, Env Review Division Manager	May 4, 2011 5:20 PM
3	Ken Solomon, Contract Planner	May 4, 2011 4:16 PM
4	Camela Campbell	May 4, 2011 3:47 PM
5	Christina Jaworski	May 3, 2011 1:36 PM
6	Jeanie Poling	May 3, 2011 11:53 AM
7	Monica Pereira	May 3, 2011 8:46 AM
8	Thomas Rogers	May 2, 2011 6:18 PM
9	Diana Keena	May 2, 2011 4:17 PM
10	Noel M. Ibalio	May 2, 2011 1:43 PM
11	Debra Dwyer	May 2, 2011 12:40 PM
12	Gillian Hayes	May 2, 2011 12:27 PM
13	Rachel Schuett	May 2, 2011 11:25 AM
14	David Goodison	May 2, 2011 9:57 AM
15	Rachel Warner	Apr 29, 2011 4:26 PM
16	Janis Moore	Apr 29, 2011 1:34 PM
17	Maureen Riordan	Apr 29, 2011 1:33 PM
18	Damon DiDonato	Apr 29, 2011 10:44 AM
19	Martha Jensen Felsch	Apr 29, 2011 10:08 AM
20	Steven Buckley	Apr 29, 2011 10:08 AM
21	Jeff Bond	Apr 29, 2011 10:08 AM
22	Steve Flint	Apr 29, 2011 9:33 AM
23	William Meeker	Apr 29, 2011 9:18 AM
24	Cathleen Baker	Apr 29, 2011 8:39 AM
25	Peter Albert	Apr 28, 2011 10:19 PM
26	Jason Burke	Apr 28, 2011 8:34 PM
27	Steven H. Smith	Apr 28, 2011 7:01 PM
28	Michael Schwartz	Apr 28, 2011 6:32 PM

Q1. Answers to the survey are anonymous. If you wish, please provide the following:

29	Michelle Hightower	Apr 28, 2011 5:34 PM
30	John Kearns	Apr 28, 2011 5:26 PM
31	Andrew Young	Apr 28, 2011 4:57 PM
32	Gerri Caruso	Apr 28, 2011 4:11 PM
33	Kelly Diekmann	Apr 28, 2011 2:39 PM
34	Devyani Jain	Apr 28, 2011 1:10 PM
35	Andrea Contreras	Apr 28, 2011 11:29 AM
37	Peter Gilli	Apr 27, 2011 11:32 AM
38	Elizabeth Dunn	Apr 27, 2011 10:50 AM
39	Bob Brown	Apr 27, 2011 10:03 AM
40	Steve Prosser	Apr 27, 2011 9:29 AM
41	Dan Marks	Apr 26, 2011 2:42 PM
42	DENNIS TAGASHIRA	Apr 26, 2011 12:53 PM
43	David Woltering, AICP	Apr 26, 2011 12:26 PM
44	Tom Passanisi	Apr 25, 2011 1:33 PM
45	Kathleen Livermore	Apr 25, 2011 12:08 PM
46	Elizabeth Cullinan	Apr 25, 2011 11:14 AM
47	Susan Frost	Apr 25, 2011 8:47 AM
48	Zachary Dahl, AICP	Apr 25, 2011 8:29 AM
49	Tim Tune	Apr 25, 2011 8:29 AM
50	Debbie Mytels	Apr 22, 2011 12:54 PM
51	Philip Vince	Apr 22, 2011 11:47 AM
52	Art Brook	Apr 22, 2011 9:52 AM
53	Darin Ranelletti	Apr 22, 2011 9:25 AM
54	Hillary Gitelman	Apr 22, 2011 8:30 AM
55	Gary Helfrich	Apr 21, 2011 6:33 PM
56	Kenyon Webster	Apr 21, 2011 4:42 PM
57	Tatum Mothershead	Apr 21, 2011 4:40 PM
58	Eugene T. Flannery	Apr 21, 2011 3:52 PM

Q1. Answers to the survey are anonymous. If you wish, please provide the following:

Agency:		
1	County of Santa Clara	May 5, 2011 4:21 PM
2	Sonoma County PRMD	May 4, 2011 5:20 PM
3	Solano County Dept of Resource Mgmt. - Planning Div.	May 4, 2011 4:16 PM
4	City of Union City	May 4, 2011 3:47 PM
5	Valley Transportation Authority	May 3, 2011 1:36 PM
6	San Francisco Planning Department	May 3, 2011 11:53 AM
7	SF Planning	May 3, 2011 8:46 AM
8	City of Menlo Park	May 2, 2011 6:18 PM
9	City of Emeryville	May 2, 2011 4:17 PM
10	City of El Cerrito	May 2, 2011 1:43 PM
11	San Francisco Planning Department	May 2, 2011 12:40 PM
12	City of Santa Rosa	May 2, 2011 12:27 PM
13	City and County of San Francisco, Planning Department	May 2, 2011 11:25 AM
14	City of Sonoma	May 2, 2011 9:57 AM
15	Marin County Community Development Agency	Apr 29, 2011 4:26 PM
16	City of San Jose, Dept of PBCE, Planning Div, Env Team	Apr 29, 2011 1:34 PM
17	Redwood City	Apr 29, 2011 1:33 PM
18	City of Belmont	Apr 29, 2011 10:44 AM
19	City of Dixon	Apr 29, 2011 10:08 AM
20	City of Berkeley Planning Department	Apr 29, 2011 10:08 AM
21	City of Albany	Apr 29, 2011 10:08 AM
22	City of Half Moon Bay	Apr 29, 2011 9:33 AM
23	City of Burlingame	Apr 29, 2011 9:18 AM
24	San Mateo County Health System	Apr 29, 2011 8:39 AM
25	SFMTA	Apr 28, 2011 10:19 PM
27	CCSF	Apr 28, 2011 7:01 PM
28	San Francisco County Transportation Authority	Apr 28, 2011 6:32 PM
29	City of Vallejo	Apr 28, 2011 5:34 PM

Q1. Answers to the survey are anonymous. If you wish, please provide the following:

30	Suisun City	Apr 28, 2011 5:26 PM
31	Alameda County Planning Department	Apr 28, 2011 4:57 PM
32	City of Sunnyvale	Apr 28, 2011 4:11 PM
33	City of Fremont	Apr 28, 2011 2:39 PM
34	San Francisco Planning Department	Apr 28, 2011 1:10 PM
35	San Francisco Planning Department	Apr 28, 2011 11:29 AM
37	City of Mountain View	Apr 27, 2011 11:32 AM
38	City of Novato	Apr 27, 2011 10:50 AM
39	City of San Rafael	Apr 27, 2011 10:03 AM
40	City of Campbell	Apr 27, 2011 9:29 AM
41	City of Berkeley	Apr 26, 2011 2:42 PM
42	City of Hercules	Apr 26, 2011 12:53 PM
43	City of Clayton	Apr 26, 2011 12:26 PM
44	City of Redwood City	Apr 25, 2011 1:33 PM
45	City of San Leandro	Apr 25, 2011 12:08 PM
46	Town of Hillsborough	Apr 25, 2011 11:14 AM
47	City of Livermore	Apr 25, 2011 8:47 AM
48	City of Los Altos	Apr 25, 2011 8:29 AM
49	City of Brisbane	Apr 25, 2011 8:29 AM
50	Acterra	Apr 22, 2011 12:54 PM
51	City of Martinez	Apr 22, 2011 11:47 AM
52	Marin County Public Works	Apr 22, 2011 9:52 AM
53	City of Oakland, Planning and Zoning Division	Apr 22, 2011 9:25 AM
54	Napa County	Apr 22, 2011 8:30 AM
55	Sonoma County Permit and Resource Management Department	Apr 21, 2011 6:33 PM
56	City of Sebastopol	Apr 21, 2011 4:42 PM
57	City of Daly City	Apr 21, 2011 4:40 PM
58	Mayor's Office of Housing - San Francisco	Apr 21, 2011 3:52 PM

Email Address:

Q1. Answers to the survey are anonymous. If you wish, please provide the following:

1	rob.eastwood@pln.sccgov.org	May 5, 2011 4:21 PM
2	sbriggs1@sonoma-county.org	May 4, 2011 5:20 PM
3	kmsolomon@solanocounty.com	May 4, 2011 4:16 PM
4	carmelac@unioncity.org	May 4, 2011 3:47 PM
5	Christina.Jaworski@vta.org	May 3, 2011 1:36 PM
6	jeanie.poling@sfgov.org	May 3, 2011 11:53 AM
7	monica.pereira@sfgov.org	May 3, 2011 8:46 AM
8	throggers@menlopark.org	May 2, 2011 6:18 PM
9	dkeena@emeryville.org	May 2, 2011 4:17 PM
10	nibalio@ci.el-cerrito.ca.us	May 2, 2011 1:43 PM
11	debra.dwyer@sfgov.org	May 2, 2011 12:40 PM
12	ghayes@srcity.org	May 2, 2011 12:27 PM
13	rachel.schuett@sfgov.org	May 2, 2011 11:25 AM
14	dgoodison@sonomacity.org	May 2, 2011 9:57 AM
15	rwarner@co.marin.ca.us	Apr 29, 2011 4:26 PM
16	janis.moore@sanjoseca.gov	Apr 29, 2011 1:34 PM
17	mriordan@redwoodcity.org	Apr 29, 2011 1:33 PM
18	ddidonato@belmont.gov	Apr 29, 2011 10:44 AM
19	mjensen@ci.dixon.ca.us	Apr 29, 2011 10:08 AM
20	sbuckley@cityofberkeley.info	Apr 29, 2011 10:08 AM
21	jbond@albanyca.org	Apr 29, 2011 10:08 AM
22	stevef@hmbcity.com	Apr 29, 2011 9:33 AM
23	wmeeker@burlingame.org	Apr 29, 2011 9:18 AM
24	cabaker@co.sanmateo.ca.us	Apr 29, 2011 8:39 AM
25	peter.albert@sfmta.com	Apr 28, 2011 10:19 PM
27	Steve.Smith@sfgov.org	Apr 28, 2011 7:01 PM
29	mhightower@ci.vallejo.ca.us	Apr 28, 2011 5:34 PM
30	jkearns@suisun.com	Apr 28, 2011 5:26 PM
31	andrew.young@acgov.org	Apr 28, 2011 4:57 PM

Q1. Answers to the survey are anonymous. If you wish, please provide the following:

32	gcaruso@ci.sunnyvale.ca.us	Apr 28, 2011 4:11 PM
33	kdiekmann@fremont.gov	Apr 28, 2011 2:39 PM
34	jain_devyani@yahoo.com	Apr 28, 2011 1:10 PM
35	andrea.contreras@sfgov.org	Apr 28, 2011 11:29 AM
36	scotsteg@monitor.net	Apr 27, 2011 3:48 PM
37	pgilli@mountainview.gov	Apr 27, 2011 11:32 AM
38	edunn@novato.org	Apr 27, 2011 10:50 AM
39	bob.brown@cityofsanrafael.org	Apr 27, 2011 10:03 AM
40	stevep@cityofcampbell.com	Apr 27, 2011 9:29 AM
41	dmarks@ci.berkeley.ca.us	Apr 26, 2011 2:42 PM
42	dennis.tagashira@ci.hercules.ca.us	Apr 26, 2011 12:53 PM
43	dwoltering@ci.clayton.ca.us	Apr 26, 2011 12:26 PM
44	tpassanisi@redwoodcity.org	Apr 25, 2011 1:33 PM
45	klivermore@sanleandro.org	Apr 25, 2011 12:08 PM
47	smfrost@ci.livermore.ca.us	Apr 25, 2011 8:47 AM
48	zdahl@losaltosca.gov	Apr 25, 2011 8:29 AM
49	timtune@ci.brisbane.ca.us	Apr 25, 2011 8:29 AM
50	debbiem@acterra.org	Apr 22, 2011 12:54 PM
51	pvince@cityofmartinez.org	Apr 22, 2011 11:47 AM
52	abrook@co.marin.ca.us	Apr 22, 2011 9:52 AM
53	dranelletti@oaklandnet.com	Apr 22, 2011 9:25 AM
54	hillary.gitelman@countyofnapa.org	Apr 22, 2011 8:30 AM
55	ghelfric@sonoma-county.org	Apr 21, 2011 6:33 PM
56	kplan@sonic.net	Apr 21, 2011 4:42 PM
57	tmothershead@dalycity.org	Apr 21, 2011 4:40 PM
58	eugene.flannery@sfgov.org	Apr 21, 2011 3:52 PM

Q2. As a lead agency, do you use the Air District's 2010 CEQA thresholds of significance when performing environmental review? Please check all that apply.

1	We have not yet had a recent proeject that requires an environmental review.	Apr 29, 2011 10:08 AM
2	As the public health department for San Mateo County, we have been staying up to date on the tools and have discussed the 2010 CEQA thresholds with planners in several of our cities (who have concerns about making infill projects work under the new thresholds and ensuring proper use of tools across varied planning staffs).	Apr 29, 2011 8:39 AM
3	not sure	Apr 28, 2011 10:19 PM
4	No	Apr 28, 2011 1:10 PM
5	SF's Dept. of Public Health has a threshold for PM2.5, which we also use.	Apr 28, 2011 11:29 AM
6	We have neither the resources nor expertise to do our own and if we did, we'd have to then explain why they are different - a very tough test for a local agency in relation to BAAQMD. It would be good for BAAQMD to recognize that local agencies don't really have much choice but to use these as if they were requirements.	Apr 26, 2011 2:42 PM
7	We do not do this kind of work; not applicable.	Apr 22, 2011 12:54 PM

Q4. If you answered yes, you have found that potential air quality impacts ALONE are the sole purpose in preparing a DEIR, provide the project(s) name below.

1	<p>Unfortunately many in the region are not using the guidelines and therefore this question will be skewed. Because the health risk thresholds include individual sources and cumulative sources, any one roadway can trigger an EIR. This means, any one roadway above a cancer threshold of 10 in a million is a significant impact. For those projects where there has been a potential to exceed the single source threshold from the siting of a new receptor, the District has been very much involved in developing solutions or workarounds from the CEQA Guidance that are project-specific. Clearly the published guidance needs to be revised to avoid any misdirection and to clearly document under what circumstances adjustments can be made. These project-specific efforts have resulted in individual projects spending a considerable amount on time and money on an analysis to show that they are below the thresholds. Its not as though a project comes in and the district looks at it and tells you if you pass the thresholds or not. There is considerable back and forth on the level of analysis and the modeling parameters to show that there would not be an impact. Any type of adjustments to the modeling parameters should be defined in the District's methodology to avoid confusion. [Please note that this doesn't necessarily answer the question. Because the thresholds haven't technically been in effect for health risks, we've been able to clear these projects over the last year. However, our ability to do this will end as of May 1.]</p>	May 3, 2011 11:53 AM
2	<p>2895 San Bruno Ave - SF (10 mixed use units). To comply with the District's new guidelines, a tremendous amount of staff time and sponsor's money is spent for screening a project alone. Screening that results in request for additional studies because the project results in a single source threshold excendence and will require a construction risk assessment. The District should put tools in place to streamline the process. Perhaps have more refined regional screening tools that better reflect the "real working environment" in SF.</p>	May 3, 2011 8:46 AM
3	<p>Monterey Road Commercial Center Zone Change and Subdivision and Fortino Zone Change</p>	May 2, 2011 4:22 PM
4	<p>Unfortunately many in the region are not using the guidelines and therefore this question will be skewed. Because the health risk thresholds include individual sources and cumulative sources, any one roadway can trigger an EIR. This means, any one roadway above a cancer threshold of 10 in a million is a significant impact. For those projects where there has been a potential to exceed the single source threshold from the siting of a new receptor, the District has been very much involved in developing solutions or workarounds from the CEQA Guidance that are project-specific. Clearly the published guidance needs to be revised to avoid any misdirection and to clearly document under what circumstances adjustments can be made. These project-specific efforts have resulted in individual projects spending a considerable amount on time and money on an analysis to show that they are below the thresholds. Its not as though a project comes in and the district looks at it and tells you if you pass the thresholds or not. There is considerable back and forth on the level of analysis and the modeling parameters to show that there would not be an impact. Any type of adjustments to the modeling parameters should be defined in the District's methodology to avoid confusion.</p>	May 2, 2011 12:40 PM

Q4. If you answered yes, you have found that potential air quality impacts ALONE are the sole purpose in preparing a DEIR, provide the project(s) name below.

5	<p>Burlingame Downtown Specific Plan, Burlingame Safeway Mixed-Use Development Project, for both of these projects significant mitigation, including changes to the project description were required to keep us from preparing an EIR. Impacts were related to the amount of GHGs generated. Threshold is clearly too low for both programmatic and project-level analysis, as the Burlingame Downtown Specific Plan was designed to be walkable, and the Safeway project was a small addition to a grocery store. For the Oakland Housing Element, many air quality impacts were encountered using the BAAQMD Guidelines. Traffic impacts would have triggered the EIR anyway, but the AQ impacts identified may have been excessive given strict adherence to the BAAQMD Guidelines. For example, by using the buffer zones for TAC emitters, there are very few sites in Oakland that are suitable for housing (sensitive receptors), however, there was no way to verify whether or not all of those stationary sources actually exist, are operational, and/or are actually emitting TACs. Therefore, the analysis that was provided may have identified significant unavoidable impacts that are not actually occurring.</p>	May 2, 2011 11:25 AM
6	<p>We are currently finding with one high profile project that GHG emissions alone are triggering preparation of a Supplemental EIR, rather than allowing for an EIR Addendum.</p>	Apr 29, 2011 4:26 PM
7	<p>I have heard mention of challenging projects in San Mateo, Redwood City, and Daly City but don't know that air quality impacts alone triggered the need for DEIRs in these cases.</p>	Apr 29, 2011 8:39 AM
8	<p>I answered no, but I am in the process of assessing several projects that are expected to required a Neg Dec under CEQA, but may require an EIR, depending on the results of the forthcoming health risk assessment as required by BAAQMD.</p>	Apr 28, 2011 7:01 PM
9	<p>1.) Supplemental EIR for Pacific Commons Retail-certified December 2010 2.) Preliminary Review Aff. Housing Beard Rd. 3.) Preliminary Review Commercial to Residential Central Chevrolet 4.) Preliminary Review Chik-Fil-A Fast Food Restaurant 5.) Preliminary Review Mixed Use High Density Housing Centerville Unified Site **Note that the preliminary review applications did not actually submit and go through CEQA once the potential AQ issue was identified.</p>	Apr 28, 2011 2:39 PM
10	<p>Unfortunately many in the region are not using the guidelines and therefore this question will be skewed. Because the health risk thresholds include individual sources and cumulative sources, any one roadway can trigger an EIR. This means, any one roadway above a cancer threshold of 10 in a million is a significant impact. For those projects where there has been a potential to exceed the single source threshold from the siting of a new receptor, the District has been very much involved in developing solutions or workarounds from the CEQA Guidance that are project-specific. Clearly the published guidance needs to be revised to avoid any misdirection and to clearly document under what circumstances adjustments can be made. These project-specific efforts have resulted in individual projects spending a considerable amount on time and money on an analysis to show that they are below the thresholds. Its not as though a project comes in and the district looks at it and tells you if you pass the thresholds or not. There is considerable back and forth on the level of analysis and the modeling parameters to show that there would not be an impact. Any type of adjustments to the modeling parameters should be defined in the District's methodology to avoid confusion.</p>	Apr 28, 2011 1:10 PM

Q4. If you answered yes, you have found that potential air quality impacts ALONE are the sole purpose in preparing a DEIR, provide the project(s) name below.

11	Decline to state. Please contact me directly to discuss.	Apr 28, 2011 11:29 AM
12	Unfortunately many in the region are not using the guidelines and therefore this question will be skewed. Because the health risk thresholds include individual sources and cumulative sources, any one roadway can trigger an EIR. This means, any one roadway above a cancer threshold of 10 in a million is a significant impact. For those projects where there has been a potential to exceed the single source threshold from the siting of a new receptor, the District has been very much involved in developing solutions or workarounds from the CEQA Guidance that are project-specific. Clearly the published guidance needs to be revised to avoid any misdirection and to clearly document under what circumstances adjustments can be made. These project-specific efforts have resulted in individual projects spending a considerable amount on time and money on an analysis to show that they are below the thresholds. Its not as though a project comes in and the district looks at it and tells you if you pass the thresholds or not. There is considerable back and forth on the level of analysis and the modeling parameters to show that there would not be an impact. Any type of adjustments to the modeling parameters should be defined in the District's methodology to avoid confusion.	Apr 28, 2011 10:31 AM
13	Environmental review for the project was underway prior to June 2010, so it was exempted from a DEIR, but otherwise one would have been required.	Apr 27, 2011 5:14 PM
14	San Antonio Center	Apr 27, 2011 11:32 AM
15	Hanna Ranch	Apr 27, 2011 10:50 AM
16	I answered no, but BAAQMD should recognize that since the Guidelines were adopted, there has been very little residential development proposed in this community and I don't think we're alone. I do not expect the answer to remain "no" for very long once the market recovers.	Apr 26, 2011 2:42 PM
17	No specific projects at this time. In speaking with potential developers the City acknowledged that the likelihood of an EIR had increased due to air quality impacts.	Apr 25, 2011 11:09 AM
18	The survey wouldn't let me respond "not applicable," since I don't ahve any info to share here.	Apr 22, 2011 12:54 PM
19	The Project proponents are private firms who have indicated they will not seek a permit in this air basin due to Air Quality regulations.	Apr 22, 2011 8:39 AM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

1	quantify mitigation measures (Health Hazards Risk) Need assistance on GIS mapping of roads Need Data for stationary sources - not just "contact BAAQMD"	May 5, 2011 4:21 PM
2	While we have not utilized the remainder of these directly (i.e., with County staff), our EIR and/or Air Quality consultants have utilized some, as needed.	May 4, 2011 5:20 PM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

3 First, the roadway tables are incorrect as they pertain to the cancer risks. This has been confirmed by District staff. The stationary source tool has many errors, especially concerning the location of the sources. The stationary source locations can be off by 200 feet. For example, there are some sources in the Bay. Additionally, the district has not prepared any documentation as to the methodology used to develop the screening tools. How confident can we be with this data? It is our experience that many consultants do not understand the risk and hazard modeling methodology, although the cost for conducting the analysis is in the range of 40-80K. The construction risk and hazard analysis is not a useful tool for dense areas because it relies on a minimum of one City block for a less than significant impact. Meaning, you cannot have any construction activities within a block of a residential use. The rationale for conducting long term health risk analyses for very short duration construction periods is questionable. The district has not provided any rationale for short term construction impacts having long term health outcomes. Additionally, the age sensitivity factors developed by OEHHA were designed to be applied to a very specific number of pollutants, but the district's guidance applies the age sensitivity factors to all pollutants, irrespective of the OEHHA guidance. There are also issues with GHG plan-level quantification guidance. Traditional Climate Action Plans focused on higher lever policies and citywide strategies. Having a plan that is much more focused on new development looses sight of the overall goal, especially in San Francisco where existing buildings make up the majority of GHG emissions; although, the Plan level guidance is much improved from the project by project GHG quantification. The GHG threshold itself is suspect, considering the threshold was based only on natural gas, electricity use and vehicle trips and the guidance from the District says to incorporate many other factors into the quantification of project-level GHGs including: water, waste, off-road vehicles, etc. Additionally, the quantitative thresholds do not take into account infill projects along transit lines sufficiently as the transportation component of the analysis is based on ITE trip rates, which are not the trip generation rates used for San Francisco. Additionally, the mitigation measure effectiveness is suspect. Many sites in urban areas already incorporate the features of the mitigation strategies including walkability, neighborhood services, transit service, etc. Has there been any analysis to see how much GHGs are emitted from real project sites? Much of the quantitative GHG analysis is based on very old trip generation guidance. Additional tools to be provided: Update all the tools such that they are accurate, have them peer reviewed to ensure accuracy. Develop a construction health risk tool that is useful in urban areas. Such a tool should include a size of a project that would clearly be below the threshold, as well as a screening tool that takes the outputs from UREBMIS or CalEEMod and conducts a screening level health risk calculation. Also completely missing from the guidance is feasible mitigation measures. For a project that may have a significant impact from construction, what types of construction equipment are not only available on the market, but that a contractor can reasonably be expected to have in their fleet? Furthermore, we need a methodology for calculated health risk reductions from indoors and outdoors and indoors with air filtration. In many locations, the only feasible mitigation measures are filtration systems. The air toxic analysis is always conducted assuming someone is sitting outside their home for 70 years. There is a reduction in air pollutants during the time one is indoors and a further reduction if the ventilation systems include air filtration. There is much needed guidance on this. A local agency needs a methodology that can be employed to show how effective air filtration is. The current methodology documents do not provide any such guidance for analysis. For example, what TACs are filtered through filtration systems? How effective are various filtration systems? How can we quantitatively assess the residual impact after incorporating filtration to ensure that projects are mitigated below the level of significance-

May 3, 2011 11:53 AM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

3	for each individual source that may be affecting the site.	May 3, 2011 11:53 AM
4	Additional tools to be provided: Update all the tools such that they are accurate, have them peer reviewed to ensure accuracy. Develop a construction health risk tool that is useful in urban areas. Such a tool should include a size of a project that would clearly be below the threshold, as well as a screening tool that takes the outputs from UREBMIS or CalEEMod and conducts a screening level health risk calculation. Also completely missing from the guidance is feasible mitigation measures. For a project that may have a significant impact from construction, what types of construction equipment are not only available on the market, but that a contractor can reasonably be expected to have in their fleet? Furthermore, we need a methodology for calculated health risk reductions from outdoors and indoors with air filtration.	May 3, 2011 8:46 AM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

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May 2, 2011 12:40 PM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

5 for each individual source that may be affecting the site.

May 2, 2011 12:40 PM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

6 Note: We do not use BGM. First, the roadway tables are incorrect as they pertain to the cancer risks. This has been confirmed by District staff. The stationary source tool has many errors, especially concerning the location of the sources. The stationary source locations can be off by 200 feet. For example, there are some sources in the Bay. Additionally, the district has not prepared any documentation as to the methodology used to develop the screening tools. How confident can we be with this data? It is our experience that many consultants do not understand the risk and hazard modeling methodology, although the cost for conducting the analysis is in the range of 40-80K. The construction risk and hazard analysis is not a useful tool for dense areas because it relies on a minimum of one City block for a less than significant impact. Meaning, you cannot have any construction activities within a block of a residential use. The rationale for conducting long term health risk analyses for very short duration construction periods is questionable. The district has not provided any rationale for short term construction impacts having long term health outcomes. Additionally, the age sensitivity factors developed by OEHHA were designed to be applied to a very specific number of pollutants, but the district's guidance applies the age sensitivity factors to all pollutants, irrespective of the OEHHA guidance. There are also issues with GHG plan-level quantification guidance. Traditional Climate Action Plans focused on higher lever policies and citywide strategies. Having a plan that is much more focused on new development looses sight of the overall goal, especially in San Francisco where existing buildings make up the majority of GHG emissions; although, the Plan level guidance is much improved from the project by project GHG quantification. The GHG threshold itself is suspect, considering the threshold was based only on natural gas, electricity use and vehicle trips and the guidance from the District says to incorporate many other factors into the quantification of project-level GHGs including: water, waste, off-road vehicles, etc. Additionally, the quantitative thresholds do not take into account infill projects along transit lines sufficiently as the transportation component of the analysis is based on ITE trip rates, which are not the trip generation rates used for San Francisco. Additionally, the mitigation measure effectiveness is suspect. Many sites in urban areas already incorporate the features of the mitigation strategies including walkability, neighborhood services, transit service, etc. Has there been any analysis to see how much GHGs are emitted from real project sites? Much of the quantitative GHG analysis is based on very old trip generation guidance. Additional tools to be provided: Update all the tools such that they are accurate, have them peer reviewed to ensure accuracy. Develop a construction health risk tool that is useful in urban areas. Such a tool should include a size of a project that would clearly be below the threshold, as well as a screening tool that takes the outputs from UREBMIS or CalEEMod and conducts a screening level health risk calculation. Also completely missing from the guidance is feasible mitigation measures. For a project that may have a significant impact from construction, what types of construction equipment are not only available on the market, but that a contractor can reasonably be expected to have in their fleet? Furthermore, we need a methodology for calculated health risk reductions from indoors and outdoors and indoors with air filtration. In many locations, the only feasible mitigation measures are filtration systems. The air toxic analysis is always conducted assuming someone is sitting outside their home for 70 years. There is a reduction in air pollutants during the time one is indoors and a further reduction if the ventilation systems include air filtration. There is much needed guidance on this. A local agency needs a methodology that can be employed to show how effective air filtration is. The current methodology documents do not provide any such guidance for analysis. For example, what TACs are filtered through filtration systems? How effective are various filtration systems? How can we quantitatively assess the residual impact after incorporating filtration to ensure that projects are mitigated below the

May 2, 2011 11:25 AM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

6	level of significance- for each individual source that may be affecting the site.	May 2, 2011 11:25 AM
7	Our EIR consultants might us all/some of the above BAAQMD. Am uncertain on exactly all of them.	Apr 29, 2011 4:26 PM
8	Our EIR consultants use all the above.	Apr 29, 2011 1:33 PM
9	Not yet, but have attended the training annd hope to get more directly involved.	Apr 29, 2011 10:08 AM
10	We are in the scoping phases of a rapid health impact assessment that will focus on Daly City and it is likely to include air quality impacts from proposed change, so we will be employing the above BAAQMD tools. Given the concerns coming out of our cities, we would like our staff to build capacity in this area so we can be a resource to them work through the tools and help them select cost-effective changes / mitigation options that are most supportive of public health. Given the individual plans and local data that that our many jurisdictions would use to customize URBEMIS & BGM values, we're not in a position to run the tools "for" each of our cities, but want to be able to help them, because it furthers all of our goals (growth, human health, slowing climate change, etc.).	Apr 29, 2011 8:39 AM
11	I manage the consultants that use some or all of these tools. But I would like to see a construction risk calculator or some other screening method that can be used to identify projects that are not likely to result in a health risk, as defined by the BAAQMD guidelines.	Apr 28, 2011 7:01 PM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

12

ROADWAY TABLES: The roadway tables are incorrect as they pertain to the cancer risks. This has been confirmed by District staff. The stationary source tool has many errors, especially concerning the location of the sources. The stationary source locations can be off by 200 feet. For example, there are some sources in the Bay. Additionally, the district has not prepared any documentation as to the methodology used to develop the screening tools. How confident can we be with this data? It is our experience that many consultants do not understand the risk and hazard modeling methodology, although the cost for conducting the analysis is in the range of 40-80K. The construction risk and hazard analysis is not a useful tool for dense areas because it relies on a minimum of one City block for a less than significant impact. Meaning, you cannot have any construction activities within a block of a residential use. The rationale for conducting long term health risk analyses for very short duration construction periods is questionable. The district has not provided any rationale for short term construction impacts having long term health outcomes. Additionally, the age sensitivity factors developed by OEHHA were designed to be applied to a very specific number of pollutants, but the district's guidance applies the age sensitivity factors to all pollutants, irrespective of the OEHHA guidance. GHG PLAN LEVEL ANALYSIS: There are issues with GHG plan-level quantification guidance. Traditional Climate Action Plans focused on higher lever policies and citywide strategies. Having a plan that is much more focused on new development loses sight of the overall goal, especially in San Francisco where existing buildings make up the majority of GHG emissions; although, the Plan level guidance is much improved from the project by project GHG quantification. The GHG threshold itself is suspect, considering the threshold was based only on natural gas, electricity use and vehicle trips and the guidance from the District says to incorporate many other factors into the quantification of project-level GHGs including: water, waste, off-road vehicles, etc. The creation of a "Qualified Climate Action Strategy" appears to push the focus of municipal climate planning from higher level, comprehensive view of all community sectors to an emphasis on new construction projects specifically and in isolation. VEHICLE EMISSIONS AND INFILL: The quantitative GHG thresholds do not take into account infill projects along transit lines sufficiently as the transportation component of the analysis is based on ITE trip rates, which are not the trip generation rates used for San Francisco. Additionally, the mitigation measure effectiveness is suspect. Many sites in urban areas already incorporate the features of the mitigation strategies including walkability, neighborhood services, transit service, etc. Has there been any analysis to see how much GHGs are emitted from real project sites? Much of the quantitative GHG analysis is based on very old trip generation guidance. New studies have shown that new residential infill development does not generate any net new vehicle trips. TOOLS & RESOURCES : Additional tools to be provided: Update all the tools such that they are accurate, have them peer reviewed to ensure accuracy. Develop a construction health risk tool that is useful in urban areas. Such a tool should include a size of a project that would clearly be below the threshold, as well as a screening tool that takes the outputs from UREBMIS or CalEEMod and conducts a screening level health risk calculation. MITIGATION MEASURES: AIR QUALITY, Missing from the guidance is feasible mitigation measures. For a project that may have a significant impact from construction, what types of construction equipment are not only available on the market, but that a contractor can reasonably be expected to have in their fleet? A methodology for calculated health risk reductions from indoors and outdoors and indoors with air filtration is needed. In many locations, the only feasible mitigation measures are filtration systems. The air toxic analysis is always conducted assuming someone is sitting outside their home for 70 years. There is a reduction in air pollutants during the time one is indoors and a further reduction if the ventilation systems include air filtration. Guidance on how to approach this is needed.

Apr 28, 2011 6:32 PM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

12 A local agency needs a methodology that can be employed to show how effective air filtration is. The current methodology documents do not provide any such guidance for analysis. For example, what TACs are filtered through filtration systems? How effective are various filtration systems? How can we quantitatively assess the residual impact after incorporating filtration to ensure that projects are mitigated below the level of significance- for each individual source that may be affecting the site. GHG's, Guidance on qualifying GHG mitigation measure is also needed. The District should consult with local governments when developing this guidance so as to assist them in their existing local mitigation measures. ANY MITIGATION FUNDS SHOULD REMAIN LOCAL.

Apr 28, 2011 6:32 PM

13 Used by our consultants.

Apr 28, 2011 5:34 PM

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Apr 28, 2011 1:10 PM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

14	for each individual source that may be affecting the site.	Apr 28, 2011 1:10 PM
15	None of the tools provided take into account dense, urban settings in which infill development is the norm. Basically, none of my projects have met the screening criteria because they are mixed use and construction would occur close to a sensitive receptor. This renders the screening criteria useless for all of my projects. The cost for subsequent modeling is prohibitive for smaller projects which are cannot be screened out. Consequently, a number of infill projects become infeasible due to increased time and cost associated with modeling necessary to assess project against BAAQMD thresholds. Roadway tables should be accurate before released for use by agencies. Inaccurate information can lead to a faulty analysis and conclusion.	Apr 28, 2011 11:29 AM

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16

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Apr 28, 2011 10:31 AM

Q5. Do you use the air quality analysis tools provided by the Air District? Please check all that apply.

16	for each individual source that may be affecting the site.	Apr 28, 2011 10:31 AM
17	We don't need more screening tables, we do need more standard mitigations that would allow us to adopt CEQA exemptions when there are potential impacts (similar to those already existing for construction impacts).	Apr 26, 2011 2:42 PM
18	We contract out for the analyses; we ask the consultants involved to use the Air District's thresholds.	Apr 26, 2011 12:26 PM
19	These were used by EIR consultant. Not sure staff could use them.	Apr 26, 2011 11:54 AM
20	We are looking to use more of the web-site tools.	Apr 25, 2011 1:33 PM
21	These are used by the City's consultants.	Apr 25, 2011 11:09 AM
22	Not applicable to our work as a public education organization. We do home energy efficiency and outdoor restoration projects.	Apr 22, 2011 12:54 PM
23	The majority of our environmental documents are prepared by outside consultants. I am not sure which of the Air Resources tools are utilized by the consultants.	Apr 22, 2011 10:04 AM
24	List of BMPs for TAC exposure that if implemented will reduce impact to less than significant without need for quantified analysis.	Apr 22, 2011 9:25 AM
25	Our consultant used your tools.	Apr 21, 2011 4:42 PM

Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development? Please check all that apply.

1	<p>Many state, regional, and local policies encouraging infill development - from AB 32, to SB 375 to the BAAQMD CEQA GHG thresholds. Infill development by definition is located in areas where there is much infrastructure, and many roads, thus exposed to higher ambient health hazards risk. Thus very big challenge with encouraging and completing infill development in light of the health hazards thresholds - especially without defined and quantified mitigation measures.</p>	May 5, 2011 4:21 PM
2	<p>Frankly, infill development has not been a major issue here yet, so although I have heard from some who work in more urban settings about such concerns I have insufficient experience with this in my jurisdiction to have an opinion. I can say, however, that projects near major highways (i.e., Hwy 101) have been challenging regarding the impact of background highway related emissions/diesel particulates and the implications of these on our projects...this came up RE the Dutra Asphalt plant near Petaluma, for example.</p>	May 4, 2011 5:20 PM
3	<p>Low GHG significance levels</p>	May 4, 2011 4:16 PM
4	<p>Generally speaking, it appears that the GHG thresholds have the potential to trigger significant impacts for larger projects that are not located nearby transit. Regarding development within Union City, we have an approved Climate Action Plan that we hope to utilize to address this requirement where appropriate.</p>	May 4, 2011 3:47 PM
5	<p>There are so many variables concerning the causes of cancer. I question whether it's possible to accurately quantify cancer risks from exposure, particularly from short-term exposure during construction. The 2010 CEQA Guidelines penalize urban projects that are close to traffic sources and large buildings with emergency generators. Infill sites already incorporate measures that reduce automobile use and emissions, i.e., walkability, neighborhood services, transit service. To reduce air quality impacts, the District should focus on air pollutant sources, not quantification of impacts. The health risk analyses in the 2010 CEQA Guidelines discourage infill development by increasing the cost and time required for modeling. The District has provided no guidance on what a cumulatively considerable contribution is. How can the district permit any more generators in downtown San Francisco without exceeding the cumulative thresholds and having significant effects on nearby receptors? At what point is a project's contribution to already cumulative impacts significant? This level of analysis, followed by an EIR requirement because there isn't any guidance on mitigation measures, could be cost prohibitive for infill development. In addition, the Guidelines do nothing to decrease emissions from existing sources.</p>	May 3, 2011 11:53 AM

Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development? Please check all that apply.

6	<p>The risk and hazard thresholds for a significant impact that triggers an EIR, when siting new receptors, is effectively a cancer risk of 10 in a million, and PM2.5 at 0.3 ug/m3. What is the purpose of the single source thresholds? There should only be a cumulative threshold when citing new receptors. These thresholds are easily triggered along many roadways and the district has not provided adequate mitigations that can reduce impacts to less than significant. (For more information on this, see other responses in this survey.) Without adequate mitigation measures, it will be very challenging for infill projects to meet the single source threshold, especially when the district has permitted generators that clearly exceed the single source thresholds, and sometime also exceed the cumulative thresholds. How can the district permit any more generators in downtown San Francisco without exceeding the cumulative thresholds and having significant effects on nearby receptors? At what point is a project's contribution to already cumulative impacts significant? The District has provided no guidance on what a cumulatively considerable contribution is. In addition to the lack of available mitigation measures, the thresholds require extensive and expensive modeling efforts, in the range of 40-80K. This level of analysis, followed by an EIR requirement because there isn't any guidance on mitigation measures, could be cost prohibitive for infill projects that are usually also plagued by hazardous materials clean up requirements, and other potential environmental effects as a result of being located in an urban environment.</p>	May 3, 2011 8:46 AM
7	<p>The City of Menlo Park has recently released the Draft EIR for our El Camino Real/Downtown Specific Plan (http://www.menlopark.org/projects/comdev_eocrdowntown_eir.htm). Our analysis of the GHG impacts found this sustainably-intended, compact development infill project to significantly exceed the 4.6 per capita threshold. Taking some credits for improved energy use didn't change things significantly, since so much comes from transportation and infill projects still generate single-car trips. We could see the threshold being raised to account for transportation analyses that need to be conservative (i.e., not include unprecedented transit/mixed-use trip reductions). There may be a benefit to setting a Specific Plan threshold that maybe isn't as high as the General Plan one, but which is higher than the project-level threshold.</p>	May 2, 2011 6:18 PM
8	<p>We can't exempt projects without a study.</p>	May 2, 2011 4:17 PM

Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development? Please check all that apply.

9	<p>The risk and hazard thresholds for a significant impact that triggers an EIR, when siting new receptors, is effectively a cancer risk of 10 in a million, and PM2.5 at 0.3 ug/m3. What is the purpose of the single source thresholds? There should only be a cumulative threshold when citing new receptors. These thresholds are easily triggered along many roadways and the district has not provided adequate mitigations that can reduce impacts to less than significant. (For more information on this, see other responses in this survey.) Without adequate mitigation measures, it will be very challenging for infill projects to meet the single source threshold, especially when the district has permitted generators that clearly exceed the single source thresholds, and sometime also exceed the cumulative thresholds. How can the district permit any more generators in downtown San Francisco without exceeding the cumulative thresholds and having significant effects on nearby receptors? At what point is a project's contribution to already cumulative impacts significant? The District has provided no guidance on what a cumulatively considerable contribution is. In addition to the lack of available mitigation measures, the thresholds require extensive and expensive modeling efforts, in the range of 40-80K. This level of analysis, followed by an EIR requirement because there isn't any guidance on mitigation measures, could be cost prohibitive for infill projects that are usually also plagued by hazardous materials clean up requirements, and other potential environmental effects as a result of being located in an urban environment.</p>	May 2, 2011 12:40 PM
10	<p>Bottom line is that more mitigation is required on a project by project basis...but this is a good thing in ordre to preserve our air quality.</p>	May 2, 2011 12:27 PM
11	<p>The risk and hazard thresholds for a significant impact that triggers an EIR, when siting new receptors, is effectively a cancer risk of 10 in a million, and PM2.5 at 0.3 ug/m3. What is the purpose of the single source thresholds? There should only be a cumulative threshold when citing new receptors. These thresholds are easily triggered along many roadways and the district has not provided adequate mitigations that can reduce impacts to less than significant. (For more information on this, see other responses in this survey.) Without adequate mitigation measures, it will be very challenging for infill projects to meet the single source threshold, especially when the district has permitted generators that clearly exceed the single source thresholds, and sometime also exceed the cumulative thresholds. How can the district permit any more generators in downtown San Francisco without exceeding the cumulative thresholds and having significant effects on nearby receptors? At what point is a project's contribution to already cumulative impacts significant? The District has provided no guidance on what a cumulatively considerable contribution is. In addition to the lack of available mitigation measures, the thresholds require extensive and expensive modeling efforts, in the range of 40-80K. This level of analysis, followed by an EIR requirement because there isn't any guidance on mitigation measures, could be cost prohibitive for infill projects that are usually also plagued by hazardous materials clean up requirements, and other potential environmental effects as a result of being located in an urban environment.</p>	May 2, 2011 11:25 AM
12	<p>The thresholds are stringent and existing air quality in many infill areas is already poor or could readily become so due to high density. This makes infill development more challenging, which is counter-productive and unfortunate.</p>	Apr 29, 2011 4:26 PM

**Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development?
Please check all that apply.**

13	Development of infill projects adjacent to transit which typically occurs in the middle of and/or is aligned with adjacent to freeways/major roadways can make infill projects challenging; however, it is not impossible provided that certain building/design specific mitigation measures are deemed adequate. Would be really helpful to get agreement on those mitigation measures to provide certainty to developers when they decide to work on an infill site.	Apr 29, 2011 1:52 PM
14	For infill site near major roads/freeways - more difficult to come in under the risk & hazard threshold Infill development (indeed almost all development) is made more difficult due to GHG emissions thresholds -	Apr 29, 2011 1:34 PM
15	Locations near freeways/transit/rail lines can trigger residential health risk impacts (our PDA areas-Downtown & El Camino Real and all of our Mixed Use Corridor TOD sites where all our future growth is planned), even though residential development near transit is considered a benefit. The CEQA analysis adds to project delays, expense and leaves projects more vulnerable to CEQA challenges. The BAAQMD could assist with technical assistance and funding for a Community Risk Reduction Plan Perhaps Redwood City and San Mateo can be the pilot cities for the CRRP similar to San Francisco and San Jose. Also, BAAQMD letters of support for infill projects may help to minimize the City's exposure to CEQA challenges.	Apr 29, 2011 1:33 PM
16	We have a Climate Action Plan, so that helps address most infill, but we are concerned about the risk and hazards thresholds, without having the funding to prepare a risk reduction plan.	Apr 29, 2011 10:08 AM
17	To qualify my "yes" responses: I don't think the thresholds alone are a problem. These are exactly the thresholds we should be trying to fall under if we are to build a sustainable and healthy region. But, many local planning departments are extremely understaffed and under-resourced and my impression from them is that: 1. Getting familiar with and using the tools adds a challenging layer to the processing of projects and proposals. 2. There is a perception that the mitigation measures drive up project costs to a point where developers may balk and remove their application, which further undercuts a local governments resources. 3. Confusion: people are unsure about the community risk reduction plans, whether their existing specific/general plans are invalidated, etc. Lastly, we've heard the concerns - as BAAQMD has - from the affordable housing community (Mid-Pen, BRIDGE, Nonprofit Housing Association, etc.) that the thresholds undercut the critical need to provide more workforce and affordable housing within the region's priority development areas.	Apr 29, 2011 8:39 AM
18	I can't really speak from SFMTA on this.	Apr 28, 2011 10:19 PM
19	Trying to build near a eBART station, which is close to a freeway. Provide more design solutions, we can't move infill away from BART stations (or move BART stations away from freeways)	Apr 28, 2011 8:34 PM
20	It's not a belief, it's a fact. Under the recent BAAQMD guidelines, a project proponent can more readily develop a greenfield site versus an urban infill site. While perhaps unintended, the result is that a diservice for compact, transit-oriented development has been created, which equates to an increased incentive for more sprawling development in undeveloped areas. For example, the suggested mitigation for DPM whereby a setback provided is simply not feasible for nearly all urban infill sites.	Apr 28, 2011 7:01 PM

Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development? Please check all that apply.

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| 21 | <p>The risk and hazard thresholds for a significant impact that triggers an EIR, when siting new receptors, is effectively a cancer risk of 10 in a million, and PM2.5 at 0.3 ug/m3. What is the purpose of the single source thresholds? There should only be a cumulative threshold when citing new receptors. These thresholds are easily triggered along many roadways and the district has not provided adequate mitigations that can reduce impacts to less than significant. (For more information on this, see other responses in this survey.) Without adequate mitigation measures, it will be very challenging for infill projects to meet the single source threshold, especially when the district has permitted generators that clearly exceed the single source thresholds, and sometime also exceed the cumulative thresholds. How can the district permit any more generators in downtown San Francisco without exceeding the cumulative thresholds and having significant effects on nearby receptors? At what point is a project's contribution to already cumulative impacts significant? The District has provided no guidance on what a cumulatively considerable contribution is. In addition to the lack of available mitigation measures, the thresholds require extensive and expensive modeling efforts, in the range of 40-80K. This level of analysis, followed by an EIR requirement because there isn't any guidance on mitigation measures, could be cost prohibitive for infill projects that are usually also plagued by hazardous materials clean up requirements, and other potential environmental effects as a result of being located in an urban environment.</p> | Apr 28, 2011 6:32 PM |
| 22 | <p>The risk and hazards thresholds for receptors are the issue, I am fine with thresholds for sources. Adding an additional standard for TAC to areas already planned or designated for infill development seems to counterproductive on fostering change to TOD areas when in urbanized areas there are really no other choices to develop additional housing when you are trying to match it to existing resources. The issue of equity comes up when building new housing may be considered a significant impact when the site is already surrounded by existing homes. The jurisdictional boundaries of a city versus the boundaries of the air district itself limits site selection and doesn't take into account comparative existing conditions. GHG project thresholds, even service population ratios, appear to only facilitate the "very good to ideal" TOD projects. The GHG threshold does not help facilitate the incremental improvement in planning and design needed to create places and transform areas to TOD neighborhoods when they are starting out from a suburban baseline. Employment and retail only projects will not be able to meet the GHG standards. Difficult to sort out the technicalities of double counting trips, diverted trips, pass by trips etc. for commercial uses to try and justify why they can meet standards.</p> | Apr 28, 2011 2:39 PM |
| 23 | <p>The greenhouse gas thresholds do not include an efficiency threshold that take customers into account, and therefore retail uses and other uses that have a majority of their trips from customers will be more challenging to approve, given that they can't use the efficiency threshold to achieve CEQA compliance.</p> | Apr 28, 2011 1:56 PM |

Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development? Please check all that apply.

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| 24 | <p>The risk and hazard thresholds for a significant impact that triggers an EIR, when siting new receptors, is effectively a cancer risk of 10 in a million, and PM2.5 at 0.3 ug/m3. What is the purpose of the single source thresholds? There should only be a cumulative threshold when citing new receptors. These thresholds are easily triggered along many roadways and the district has not provided adequate mitigations that can reduce impacts to less than significant. (For more information on this, see other responses in this survey.) Without adequate mitigation measures, it will be very challenging for infill projects to meet the single source threshold, especially when the district has permitted generators that clearly exceed the single source thresholds, and sometime also exceed the cumulative thresholds. How can the district permit any more generators in downtown San Francisco without exceeding the cumulative thresholds and having significant effects on nearby receptors? At what point is a project's contribution to already cumulative impacts significant? The District has provided no guidance on what a cumulatively considerable contribution is. In addition to the lack of available mitigation measures, the thresholds require extensive and expensive modeling efforts, in the range of 50-100K. This level of analysis, followed by an EIR requirement because there isn't any guidance on mitigation measures, could be cost prohibitive for infill projects that are usually also plagued by hazardous materials clean up requirements, and other potential environmental effects as a result of being located in an urban environment.</p> | Apr 28, 2011 1:10 PM |
| 25 | <p>SF has a lot of high-traffic roadways. This makes exceedance of the PM2.5 threshold certain for all development along many roadways in SF. These projects, due to their mixed use nature (residential over ground-floor retail) and construction activity proximity to sensitive receptors, cannot be screened out. Given BAAQMD has not clearly and publicly endorsed any mitigation for this exceedance, all projects along these corridors would need to prepare an EIR due to a significant and unavoidable impact of sensitive receptor exposure for which there is no mitigation. I support the goal of improving air quality, but I don't think EIR preparation for infill projects is the way to achieve this. At least consider filtration as mitigation for PM 2.5 exceedance.</p> | Apr 28, 2011 11:29 AM |
| 26 | <p>The risk and hazard thresholds for a significant impact that triggers an EIR, when siting new receptors, is effectively a cancer risk of 10 in a million, and PM2.5 at 0.3 ug/m3. What is the purpose of the single source thresholds? There should only be a cumulative threshold when citing new receptors. These thresholds are easily triggered along many roadways and the district has not provided adequate mitigations that can reduce impacts to less than significant. (For more information on this, see other responses in this survey.) Without adequate mitigation measures, it will be very challenging for infill projects to meet the single source threshold, especially when the district has permitted generators that clearly exceed the single source thresholds, and sometime also exceed the cumulative thresholds. How can the district permit any more generators in downtown San Francisco without exceeding the cumulative thresholds and having significant effects on nearby receptors? At what point is a project's contribution to already cumulative impacts significant? The District has provided no guidance on what a cumulatively considerable contribution is. In addition to the lack of available mitigation measures, the thresholds require extensive and expensive modeling efforts, in the range of 40-80K. This level of analysis, followed by an EIR requirement because there isn't any guidance on mitigation measures, could be cost prohibitive for infill projects that are usually also plagued by hazardous materials clean up requirements, and other potential environmental effects as a result of being located in an urban environment.</p> | Apr 28, 2011 10:31 AM |

Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development? Please check all that apply.

27	A number of infill communities in the Bay Area are severely impacted by regional transportation facilities. These facilities can end up limiting urban infill development by requiring a project proponent to either mitigate for impacts it cannot control or effectively mitigate on a project-level. The costs of infill development are high and adding to those costs with a health assessment and probable EIR (even if traffic isn't a problem) can hurt cities - especially smaller infill cities in the long run. A credit of some sort for being within a certain distance of a regional generator would be an excellent start.	Apr 27, 2011 5:14 PM
28	The threshold levels result in a smart growth retail/residential infill project on major throughfares and near major transit requiring an EIR and overriding considerations. To meet the thresholds, the project would have to have been significantly reduced in scale, resulting in a 1950s style shopping center, instead of a modern, intensified mixed-use project. Also, there is conflicting principles of intensification along transit corridors and air quality expectations. Changing the thresholds would solve the problem, or providing for credits or exemptions for infill projects on transit corridors.	Apr 27, 2011 11:32 AM
29	The risk and hazard thresholds will make the location of multi-family housing near transportation corridors more difficult, at a time when particulate pollution should be decreasing as electric vehicles become more prominent.	Apr 27, 2011 10:03 AM
30	Potential infill sites are normally located adjacent to transit corridors which is a concern with regards to the siting limitations for new sensitive receptor developments in existing populated areas.	Apr 27, 2011 9:29 AM
31	Infill development, as a smart growth strategy, should be given as much leeway and exemption potential as possible, and not have to go through the gyrations of proving itself further (as it is in itself a mitigation measure in the big picture). At a minimum, the project size threshold should equate with the 5 acre threshold otherwise provided by CEQA for infill, and should include mixed use and commercial development.	Apr 26, 2011 5:21 PM
32	While BAAQMD made an effort in regard to GHG to minimize the impacts on infill development, they still fail to recognize that certain locations in the region and development at higher densities - by their nature - are GHG reducing on a regional basis despite local impacts. The criteria air pollutant thresholds seem to make infill exemptions for almost any higher density project in Berkeley unachievable since virutally all of the locations where development is likely to occur (which is the same as our PDA's) are shown as meeting the threshold for analysis - and I expect most will meet the need for mitigation (hence, at minimum a Neg Dec - and more likely, an EIR). We have not done enough of these yet to know for sure (see resonse to #4) - but suspect this is the case.	Apr 26, 2011 2:42 PM
33	Sustainable development is encouraged near transit and transportation corridors, yet these areas have the highest potential impacts.	Apr 26, 2011 11:54 AM
34	On the surface, in-fill projects by their very location are difficult to conduct air quallity risk and hazard thresholds . However, using the BAAQMD tools on the web site and staff guidance can make it easier.	Apr 25, 2011 1:33 PM

Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development? Please check all that apply.

35	<p>These assessment tools are too quantitative. If California cities are to implement AB32 and SB375, we need to focus on infill development instead of greenfield development. If an infill development qualifies for CEQA cat ex 15332 infill exemption - that should be enough. If we have to keep the thresholds, a qualitative look at infill development along side the quantitative thresholds should be a must. For example, if a rezoning or General Plan Amendment kicks a project out of 15322 cat ex, look at the positive characteristics of the proposal. Risk assessment is important to keep new populations from being impacted by existing unhealthy polluters. It seems to make more sense to regulate heavy agricultural or industrial polluters, especially methane producers, than attack sustainable infill development. Also, NIMBYs use whatever tools they can to fight infill development. Having thresholds too low and artificial helps NIMBYs effectively fight good, sustainable development.</p>	Apr 25, 2011 12:08 PM
36	<p>The City has an already approved infill project and due to the new GHG regulations the developer is not easily able to go back through the process and create a smaller project without opening the environmental document again because it requires an additional discretionary approval.</p>	Apr 25, 2011 11:09 AM
37	<p>For an infill project of any meaningful size (i.e. 200,000 sq of office), it is impossible, even with all feasible mitigation measures, to get to a less than significant level for GHG thresholds. We have a plan for a CAP in the near future, but until that point, any large project will most likely face the need for a Statement of Overriding Considerations (SOC) purely due to the GHG threshold.</p>	Apr 25, 2011 8:29 AM
38	<p>Smart growth encourages infill along major transit corridors, which the risk and hazard thresholds identify as exposing future residents to significant health risks. A potential mitigation measure is HVAC air filtering, which is less "green" than utilization of natural ventilation (open windows). Conducting site specific air quality analysis will delay approvals and increase costs for potential affordable housing projects. Any finer level of analysis that BAAQMD could provide in developing the thresholds might identify additional project sites that would not exceed the thresholds.</p>	Apr 25, 2011 8:29 AM
39	<p>The Air District's thresholds are (thankfully) becoming more rigorous. This is bound to create challenges for infill development, since infill typically means adding more cars to a smaller area. The best way to mitigate this problems is to ensure that the infill development does NOT add in more cars -- by having the development be more transit oriented, compact (ie, not single-family sprawl), and with services within a walkable radius. In other words the two issues CAN be divided IF the infill follows a "walkable cities" model.</p>	Apr 22, 2011 12:54 PM
40	<p>I think the trip treshhold is too arbitrary and cumbersome of developers who might otherwise build affordable housing in the downtown area. Sometimes the mitigation measures are far in excess of the pollution.</p>	Apr 22, 2011 11:47 AM
41	<p>1) According to the District, TAC exposure mitigation (air filtration) does not reduce outdoor exposure; i.e., there is no way to mitigate TAC exposure. District needs to develop realistic methodology to account for indoor vs. outdoor exposure. 2) In areas where the existing TAC exposure exceeds cumulative threshold, ANY construction is a significant impact. District needs to identify easy construction BMPs that will reduce to less than significant and/or adjust approach to construction-period TAC generation. A small six month construction project shouldn't be considered a significant TAC impact even if the existing TAC levels in the community are high.</p>	Apr 22, 2011 9:25 AM

**Q6. Do you believe that the Air District's thresholds increase the challenges associated with infill development?
Please check all that apply.**

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| 42 | In urban and mixed-use environments, sensitive receptors such as schools or residential uses will be proximate to many sites. If normal code requirements can address impacts, analysis should not be structured to identify 'potential impacts.' Thresholds should be set to capture unusual impacts/situations. Otherwise, what model is saying is go develop in greenfields. The new GHG threshold was triggered by a recent local 19,000 sq. ft. project (pharmacy + bank)--a surprising result. We don't yet have a City GHG plan (and don't the money to prepare). In meantime, is it intended that projects of this scale be forced to do EIRs when otherwise they would not be required? | Apr 21, 2011 4:42 PM |
| 43 | Increase in GHG and air pollution are associated with more development - there isn't enough focus on infill vs greenfield in the guidelines. | Apr 21, 2011 4:01 PM |
| 44 | Many infill development areas inevitably suffer from higher pollutant levels as they are near major employment centers, commercial districts, or highways. This means that stringent pollution standards will red flag such developments. | Apr 21, 2011 3:50 PM |

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

1	Health Hazards Risk - Ability to map areas around Freeways and County roads with data has been VERY problematic - much due to many nuances and questions on using the layers and data. Not having data for Stationary Sources is also very problematic - and could result in unnecessary delays with projects needing to obtain feedback from BAAQMD staff. No quantified mitigation measures also very problematic.	May 5, 2011 4:21 PM
2	Again, the details of such challenges have resided mainly with our consultants, but issues regarding the significance of GHG impacts - particularly for projects such as power plants in the Geysers - has been challenging, particularly in light of things such as the Avenol decision, etc. We are still wrestling with whether proposed geothermal plants that produce emissions that greatly surpass basic GHG annual thresholds might still be capable of being handled through the MND process by virtue of State goals regarding increased use of renewable resources, etc.	May 4, 2011 5:20 PM
3	Since adoption of the Guidelines, the City has been using consultants to prepare its environmental assessments so our experience using the 2010 CEQA Guidelines has been limited.	May 4, 2011 3:47 PM
4	I was assigned the CEQA review of an infill project at 121 Golden Gate Avenue, San Francisco, which proposed demolition of an existing building and construction of a new building with 90 units of affordable senior housing above a social service (St. Anthony's Dining Hall). The NOP/Initial Study was published in April 2010. Air quality was analyzed using the 1999 CEQA Guidelines, which found impacts to be less than significant -- the EIR was only to analyze only cultural resources. But the new Guidelines were published in June, and it wasn't until December 15, 2010 that the District decided to revise the effective date of the health risk thresholds. So during this time, I had to reevaluate the project using the new Guidelines. Because of the new health risk standards, the project was found to result in significant, unavoidable impacts during project construction and operation. We prepared a health risk assessment and addressed air quality in the EIR. The project site already exceeded risk thresholds due to the proximity of a stationary source -- a pre-existing air quality risk. The new threshold thus penalized this urban infill development by requiring the project proponent to analyze impacts it cannot control. The EIR consultant ran URBEMIS again for criteria air pollutants, which remained less than significant. The health risk assessment, however, determined that the one stationary source within 1,000 feet of the project site exceeded the threshold of significance. An air quality consultant contacted the District to determine the diesel risk adjustment factor. We needed to revise the air quality discussion and address health risks of both stationary sources and roadway sources. In September and October, I spent over 60 hours re-evaluating and revising the air quality discussion. Our in-house air quality expert also spent 12 hours on this project, and our in-house air quality group used this project as a learning experience in calculating roadway sources; this group collectively spent another 10 hours calculating portions of roadways to contribute to the spreadsheet that was included in the EIR. Adding the time that consultants also spent on this re-analysis, the revised air quality analysis probably required about 100 hours of professional time. All of this time was spent because BAAQMD published its new guidelines before it worked out the kinks in the analysis methodology.	May 3, 2011 11:53 AM

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

- 5 Cumulative thresholds only for siting new receptors. Revise the thresholds for siting new sensitive receptors to have only one cumulative threshold that looks at all sources within 1,000 feet of the project site. Ultimately the risks associated with single sources are reflected in a cumulative analysis and therefore (because risks are based on distance to MEI), single source thresholds are unnecessary. The BAAQMD's Thresholds of Significance, May 3, 2010, at page 46 support a cumulative cancer risk threshold of 100 in a million, HI of 10, and risk from PM 2.5 at 0.8 ug/m3. At issue: It makes no difference whether one street contributes more to a health risk than another. Health risks in urban areas are a combination of cumulative risks from a number of point sources, area sources and roadways. The current project-level thresholds being distinct from cumulative thresholds when siting new sensitive receptors is not only confusing, overly burdensome from an analytical standpoint, but also do not yield valuable information pertinent to siting new receptors. Under the current guidelines you could have Scenario A or B, described below. Scenario A- A project that has one roadway or one source that exceeds the project level thresholds with a number of smaller sources and cumulative health risks at a cancer risk of 50 in a million. Scenario B- A site with a number of sources at a risk just below the threshold and cumulative health risks greater than 50 in a million. Under these two scenarios, Scenario A would have a significant impact with respect to siting new sensitive receptors, but Scenario B would not, even though the risks at the MEI receptor is greater in Scenario B. As discussed above, ultimately the risks associated with single sources are reflected in a cumulative analysis and therefore, single source thresholds are unnecessary when siting new receptors. Allow additional mitigation measures when siting new receptors. BAAQMD Guidelines 2010 identify locating air intakes and installing air filtration systems as appropriate mitigation measures for siting new sources in areas with poor air quality. At issue: District Staff appears to be conflicted as to whether the installation of air filtration systems is acceptable mitigation. However, this mitigation measure is listed in the Guidelines and would reduce exposure. When siting new receptors, besides design considerations for the site, there currently are no additional mitigation measures. Varying the identified location of air intakes and air filters allows for a meaningful health risk analysis when siting new receptors and a path for mitigating impacts to less than significant. For projects located in highly dense urban areas, there is no other mitigation available. There is currently limited benefit from modeling air quality impacts on new receptors in urban settings because there is no guidance for assessing the impact of pollutants after incorporating air filtration systems. How can a lead agency be assured that impacts are mitigated below the level of significance? An analysis that considers all health risk sources and where air intakes can be located or a combination of air intake location plus air filtration systems ensures that indoor exposure to pollutants will be limited. This would require some research and information as to the expected efficiency of air filtration systems. It would be necessary to know exactly what pollutants are filtered by the systems and the effectiveness. Develop methods for determining a cumulatively considerable contribution. The current guidelines are unclear as to how to define a cumulatively considerable contribution to cumulative impacts. The State CEQA Guideline require that in the event that there are cumulative impacts, that the project include an analysis of its contribution to those impacts and a determination of whether the project's contribution is cumulatively considerable (CEQA Guidelines Section 15064(h)(1)). At issue: Page 42 of BAAQMD's Proposed Thresholds of Significance, May 3, 2010, Section 3.3.2 Construction, Land Use and Stationary Source Risk and Hazard Thresholds, states that, "for new sources of TACs, thresholds of significance for a single source are designed to ensure that emissions do not raise the risk of cancer or non-cancer health impacts to cumulatively significant levels." Therefore, it

May 3, 2011 8:46 AM

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

5 can be concluded that if your project does not exceed the project level thresholds, then it would not contribute considerably to cumulative health risk impacts. Similarly, the document goes on to state that cumulative PM2.5 thresholds are designed to ensure that PM2.5 concentrations are maintained below state and federal standards, similar to the criteria air pollutant thresholds. Therefore, projects that do not exceed the project level thresholds should not be anticipated to result in a cumulatively considerable contribution. While this makes sense, it is contrary to direction from BAAQMD staff which suggests that projects that clearly would not generate emissions above the project level thresholds should be included in a cumulative analysis. This suggests that such sources (i.e. small apartment building generating some new traffic) would contribute considerably to the cumulative setting. Refine criteria for construction health risks. It is currently unclear when a construction health risk analysis is required and cumulative construction health risk thresholds are not defensible from a CEQA standpoint. There needs to be a standard for the size of a project that could exceed the construction thresholds in an urban setting. At issue: The Air District has produced a screening document for determining when a construction health risk assessment is required. According to the screening tables, a project of 5 or more residential units would need to have a roughly 300 foot buffer between construction activities and another residential use (at least one City block). The only place where this would be likely to occur is in very suburban or rural areas, or industrial areas. There is no guidance as to the size of a project required to exceed the construction thresholds when a receptor is located on an adjacent property. The construction health risk thresholds present a very sharp contrast from the 1999 Guidelines which stated that adverse health risks were associated with long-term (70+ year) exposures. Prior to the revised guidelines, health risk analyses were only conducted for major construction projects expected to last 10+ years. The new guidelines only identify construction less than 6 months as "minor" sources. The new guidelines do not provide any substantial evidence supporting the health impacts from short-term construction activities. In addition to not providing substantial evidence to support health impacts from short-term construction activities, the Air District has introduced OEEHA methodology which finds that the elderly and children may be more aggravated by DPM exposure, increasing the risk 10 times for children, effectively the cancer risk threshold for construction has been reduced from 10 in a million to one in a million when the age sensitivity factors are incorporated. There is even less guidance on types of equipment that are available to mitigate construction impacts. Although equipment may be commercially available, upgrading all construction fleets may not be feasible. It is necessary to find out what types of equipment are commonly available and could be required during the CEQA process. Cumulative construction health risks are estimated by adding project construction emissions+ operational emissions (from roadways and stationary sources within 1,000 feet) + emissions from known construction projects. The requirement that a cumulative construction analysis include other known projects is not defensible. As mentioned above, only very large projects have even undergone a construction health risk analysis in the past, and, in those instances, used very different methodology than the air district is now proposing. There are many proposals in various entitlement stages and it would not be feasible to estimate health risks from projects without a health risk analysis in the past or for future projects that are in the beginning stages of entitlement. Someone would always be able to challenge that we did not analyze the entirety of construction activities within 1000 feet. Furthermore, health risks are analyzed for the MEI. The MEI for one project may, and in most cases, will be in a different location than the MEI for the proposed project. The cumulative thresholds leave projects very vulnerable to challenge. Of course, an option that moves towards a BMP-based approach would ensure that

May 3, 2011 8:46 AM

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

- 5 all projects are using the best available equipment to the degree feasible and would reduce the potential for CEQA challenges. Determining when project generated traffic should be included in operational health risk analysis. The current guidelines are unclear as to when project-generated traffic should be included in a health risk analysis. It would be useful to provide an indication of how many project generated vehicles would be expected to increase the cancer risk by 1 in a million. At Issue: Larger residential and/or commercial buildings (200-300 residential units with some retail) typically generate over about 1,000 vehicle trips. These larger buildings may also require back up generators as per the building code. While individually, the vehicle trips and generator may not exceed project-level thresholds, it is unclear whether together these two sources actually do have the potential to exceed the thresholds. The Recommended Methods for Screening and Modeling Local Risks and Hazards only identifies Roads with less than 10,000 vehicles/day to be minor low impact sources (page 13). It does not give any indication of the potential risks from 10,000 vehicles.

May 3, 2011 8:46 AM

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

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May 2, 2011 12:40 PM

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| 7 | issues with BGM operating correctly | May 2, 2011 12:27 PM |

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May 2, 2011 11:25 AM

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9	N.A.	May 2, 2011 9:57 AM
10	Quantification of reduction measures	May 2, 2011 9:21 AM
11	I have a couple of big projects coming up where I will review the 2010 CEQA Guides for Air Quality/GHG, but have not worked in any projects subject to these guidelines yet.	Apr 29, 2011 1:52 PM
12	I'm kind of an old hand at CEQA analysis - but I find it more confusing now that we have more air quality tables, etc. to deal with.	Apr 29, 2011 1:34 PM
13	Deciding how to apply thresholds to long-term plans and deciding compliance with CAP.	Apr 29, 2011 1:33 PM
14	No issues or challenges.	Apr 29, 2011 10:08 AM
15	A major issue is that many of data sources are in flux, or continuously being refined. For example, new studies are prompting many submissions to ITE to change trip generation rates that are based on outdated or invalidated assumptions. Likewise, the magnitude attributed to several mitigation measures and the summation of them also seems to be nebulous or in a state of flux (e.g. bicycle facilities, HVAC intake placement, street trees, etc.) so, though people innately seem to "get" that these help, they seem unsure of what are "the best" measures to layer together and apply.	Apr 29, 2011 8:39 AM
16	N/A	Apr 28, 2011 10:19 PM
17	Developers/politicians not wanting to do it.	Apr 28, 2011 8:34 PM
18	I work for a water agency that has spent a great deal of resources addressing the health risk associated with the construction of infrastructure projects. This expenditure of resources will continue due to the lack of proper screening tools for construction health risks, and potentially unrealistic thresholds of significance.	Apr 28, 2011 7:01 PM

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20	Need better training. URBEMIS training was only helpful if you use hte model often.	Apr 28, 2011 4:11 PM
21	The issue of mitigating TAC at a receptor is hard to know what is acceptable in terms of mitigating indoor AQ vs outdoor tac levels and the certainty that the measures will work. The Clean Air Plan consistency guidelines is difficult too since the CAP has a short time horizon and most plans extend beyond that, seems to be unfair comparison since usually short term growth rates don't vary from CAP projections.	Apr 28, 2011 2:39 PM
22	Calculating impacts and applying thresholds for construction-related activities. The idea that doubling the length of time a construction project is phased over halves the impacts is strange, to say the least.	Apr 28, 2011 1:56 PM

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| 23 | all projects are using the best available equipment to the degree feasible and would reduce the potential for CEQA challenges. Determining when project generated traffic should be included in operational health risk analysis. The current guidelines are unclear as to when project-generated traffic should be included in a health risk analysis. It would be useful to provide an indication of how many project generated vehicles would be expected to increase the cancer risk by 1 in a million. At Issue: Larger residential and/or commercial buildings (200-300 residential units with some retail) typically generate over about 1,000 vehicle trips. These larger buildings may also require back up generators as per the building code. While individually, the vehicle trips and generator may not exceed project-level thresholds, it is unclear whether together these two sources actually do have the potential to exceed the thresholds. The Recommended Methods for Screening and Modeling Local Risks and Hazards only identifies Roads with less than 10,000 vehicles/day to be minor low impact sources (page 13). It does not give any indication of the potential risks from 10,000 vehicles. | Apr 28, 2011 1:10 PM |
| 24 | See #5. | Apr 28, 2011 11:29 AM |

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

25 Cumulative thresholds only for siting new receptors. Revise the thresholds for siting new sensitive receptors to have only one cumulative threshold that looks at all sources within 1,000 feet of the project site. Ultimately the risks associated with single sources are reflected in a cumulative analysis and therefore (because risks are based on distance to MEI), single source thresholds are unnecessary. The BAAQMD's Thresholds of Significance, May 3, 2010, at page 46 support a cumulative cancer risk threshold of 100 in a million, HI of 10, and risk from PM 2.5 at 0.8 ug/m3. At issue: It makes no difference whether one street contributes more to a health risk than another. Health risks in urban areas are a combination of cumulative risks from a number of point sources, area sources and roadways. The current project-level thresholds being distinct from cumulative thresholds when siting new sensitive receptors is not only confusing, overly burdensome from an analytical standpoint, but also do not yield valuable information pertinent to siting new receptors. Under the current guidelines you could have Scenario A or B, described below. Scenario A- A project that has one roadway or one source that exceeds the project level thresholds with a number of smaller sources and cumulative health risks at a cancer risk of 50 in a million. Scenario B- A site with a number of sources at a risk just below the threshold and cumulative health risks greater than 50 in a million. Under these two scenarios, Scenario A would have a significant impact with respect to siting new sensitive receptors, but Scenario B would not, even though the risks at the MEI receptor is greater in Scenario B. As discussed above, ultimately the risks associated with single sources are reflected in a cumulative analysis and therefore, single source thresholds are unnecessary when siting new receptors. Allow additional mitigation measures when siting new receptors. BAAQMD Guidelines 2010 identify locating air intakes and installing air filtration systems as appropriate mitigation measures for siting new sources in areas with poor air quality. At issue: District Staff appears to be conflicted as to whether the installation of air filtration systems is acceptable mitigation. However, this mitigation measure is listed in the Guidelines and would reduce exposure. When siting new receptors, besides design considerations for the site, there currently are no additional mitigation measures. Varying the identified location of air intakes and air filters allows for a meaningful health risk analysis when siting new receptors and a path for mitigating impacts to less than significant. For projects located in highly dense urban areas, there is no other mitigation available. There is currently limited benefit from modeling air quality impacts on new receptors in urban settings because there is no guidance for assessing the impact of pollutants after incorporating air filtration systems. How can a lead agency be assured that impacts are mitigated below the level of significance? An analysis that considers all health risk sources and where air intakes can be located or a combination of air intake location plus air filtration systems ensures that indoor exposure to pollutants will be limited. This would require some research and information as to the expected efficiency of air filtration systems. It would be necessary to know exactly what pollutants are filtered by the systems and the effectiveness. Develop methods for determining a cumulatively considerable contribution. The current guidelines are unclear as to how to define a cumulatively considerable contribution to cumulative impacts. The State CEQA Guideline require that in the event that there are cumulative impacts, that the project include an analysis of its contribution to those impacts and a determination of whether the project's contribution is cumulatively considerable (CEQA Guidelines Section 15064(h)(1)). At issue: Page 42 of BAAQMD's Proposed Thresholds of Significance, May 3, 2010, Section 3.3.2 Construction, Land Use and Stationary Source Risk and Hazard Thresholds, states that, "for new sources of TACs, thresholds of significance for a single source are designed to ensure that emissions do not raise the risk of cancer or non-cancer health impacts to cumulatively significant levels." Therefore, it

Apr 28, 2011 10:31 AM

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

25 can be concluded that if your project does not exceed the project level thresholds, then it would not contribute considerably to cumulative health risk impacts. Similarly, the document goes on to state that cumulative PM2.5 thresholds are designed to ensure that PM2.5 concentrations are maintained below state and federal standards, similar to the criteria air pollutant thresholds. Therefore, projects that do not exceed the project level thresholds should not be anticipated to result in a cumulatively considerable contribution. While this makes sense, it is contrary to direction from BAAQMD staff which suggests that projects that clearly would not generate emissions above the project level thresholds should be included in a cumulative analysis. This suggests that such sources (i.e. small apartment building generating some new traffic) would contribute considerably to the cumulative setting. Refine criteria for construction health risks. It is currently unclear when a construction health risk analysis is required and cumulative construction health risk thresholds are not defensible from a CEQA standpoint. There needs to be a standard for the size of a project that could exceed the construction thresholds in an urban setting. At issue: The Air District has produced a screening document for determining when a construction health risk assessment is required. According to the screening tables, a project of 5 or more residential units would need to have a roughly 300 foot buffer between construction activities and another residential use (at least one City block). The only place where this would be likely to occur is in very suburban or rural areas, or industrial areas. There is no guidance as to the size of a project required to exceed the construction thresholds when a receptor is located on an adjacent property. The construction health risk thresholds present a very sharp contrast from the 1999 Guidelines which stated that adverse health risks were associated with long-term (70+ year) exposures. Prior to the revised guidelines, health risk analyses were only conducted for major construction projects expected to last 10+ years. The new guidelines only identify construction less than 6 months as "minor" sources. The new guidelines do not provide any substantial evidence supporting the health impacts from short-term construction activities. In addition to not providing substantial evidence to support health impacts from short-term construction activities, the Air District has introduced OEEHA methodology which finds that the elderly and children may be more aggravated by DPM exposure, increasing the risk 10 times for children, effectively the cancer risk threshold for construction has been reduced from 10 in a million to one in a million when the age sensitivity factors are incorporated. There is even less guidance on types of equipment that are available to mitigate construction impacts. Although equipment may be commercially available, upgrading all construction fleets may not be feasible. It is necessary to find out what types of equipment are commonly available and could be required during the CEQA process. Cumulative construction health risks are estimated by adding project construction emissions+ operational emissions (from roadways and stationary sources within 1,000 feet) + emissions from known construction projects. The requirement that a cumulative construction analysis include other known projects is not defensible. As mentioned above, only very large projects have even undergone a construction health risk analysis in the past, and, in those instances, used very different methodology than the air district is now proposing. There are many proposals in various entitlement stages and it would not be feasible to estimate health risks from projects without a health risk analysis in the past or for future projects that are in the beginning stages of entitlement. Someone would always be able to challenge that we did not analyze the entirety of construction activities within 1000 feet. Furthermore, health risks are analyzed for the MEI. The MEI for one project may, and in most cases, will be in a different location than the MEI for the proposed project. The cumulative thresholds leave projects very vulnerable to challenge. Of course, an option that moves towards a BMP-based approach would ensure that

Apr 28, 2011 10:31 AM

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

25	all projects are using the best available equipment to the degree feasible and would reduce the potential for CEQA challenges. Determining when project generated traffic should be included in operational health risk analysis. The current guidelines are unclear as to when project-generated traffic should be included in a health risk analysis. It would be useful to provide an indication of how many project generated vehicles would be expected to increase the cancer risk by 1 in a million. At Issue: Larger residential and/or commercial buildings (200-300 residential units with some retail) typically generate over about 1,000 vehicle trips. These larger buildings may also require back up generators as per the building code. While individually, the vehicle trips and generator may not exceed project-level thresholds, it is unclear whether together these two sources actually do have the potential to exceed the thresholds. The Recommended Methods for Screening and Modeling Local Risks and Hazards only identifies Roads with less than 10,000 vehicles/day to be minor low impact sources (page 13). It does not give any indication of the potential risks from 10,000 vehicles.	Apr 28, 2011 10:31 AM
26	A consultant ran the models, so I don't have this information.	Apr 27, 2011 11:32 AM
27	Criteria for air pollutants is set at an extremely low threshold. We do not want to be a position to have to do an EIR for construction dust. That is a temporary impact, and SHOULD NOT be an issue for an EIR. The thresholds need to be reasonable, not punitive.	Apr 27, 2011 10:50 AM
28	None, with the training provided, the methodologies are useful CEQA tools.	Apr 27, 2011 9:29 AM
29	Had to spend much time on resolving live/work and mixed use.	Apr 26, 2011 5:21 PM
30	See comment #4. We have had virtually no new projects proposed since the Guidelines were adopted. But based on our experience with previous projects, we believe the guidelines establish a significant new hurdle for infill developments in Berkeley.	Apr 26, 2011 2:42 PM
31	N/A	Apr 26, 2011 12:26 PM
32	The risk and hazards assessment is costly and time consuming for an in-fill project. Particularly for a project that is just over the screening criteria.	Apr 25, 2011 8:47 AM
33	We rarely have enough data about a project to answer questions associated with construction of the project.	Apr 22, 2011 2:16 PM
34	Not applicable	Apr 22, 2011 12:54 PM
35	The one area that the developers couldn't mitigate for was the collective number of threshold trips. What are they supposed to do- take a jitney to the top of the hill and their driveway every day?	Apr 22, 2011 11:47 AM
36	See answer to #6.	Apr 22, 2011 9:25 AM
37	The odor thresholds are not quantitative based and were reported as recommended thresholds leaving ambiguity for the permitted community. They are complaint based for similar facilities which is not an indication of the environmental impacts of a proposed facility.	Apr 22, 2011 8:39 AM

Q7. Identify any issues or challenges you have encountered using the air quality analysis methodologies outlined in the 2010 CEQA Guidelines.

38	We often have to analyze mixed use projects or land uses that don't fit neatly into the Urbemis and BGM categories. Some guidance would be helpful. Also, the construction threshold for NOx seems to be easily exceeded, and can be mitigated by lengthening the construction period, which seems counter productive. Some other, cost effective mitigation strategies or a different threshold would be usefull.	Apr 22, 2011 8:30 AM
39	In general, the thresholds are far to low to create any meaningful change in GHG emissions. Most smaller projects are far below the thresholds, yet have a cumulatively significant impact.	Apr 21, 2011 6:33 PM
40	Hire consultants to complete air quality analysis, which increases the cost and time associated withthe development review process.	Apr 21, 2011 4:01 PM

Q8. What, if anything, do you find confusing or unclear about the 2010 CEQA Guidelines?

1	Health Hazards Risk - Cumulative vs. Project Specific. The inclusion of both cumulative and project specific is confusing and appears unproductive. As the focus is on limiting exposure of new sensitive receptors to ambient health hazards risk - I don't see the purpose of distinguishing these, as it does not address the key issue.	May 5, 2011 4:21 PM
2	We are still struggling somewhat regarding the applicability of the 4.6 MT Co2e/SP/yr threshold to our projects...this issue came up with our recent Sutter hospital EIR.	May 4, 2011 5:20 PM
3	Commercial wind energy development in Solano County often spans more than one Air District jurisdiction, which adds unnecessary complication to project air quality assessment.	May 4, 2011 4:16 PM
4	Since adoption of the Guidelines, the City has been using consultants to prepare its environmental assessments so our experience using the 2010 CEQA Guidelines has been limited.	May 4, 2011 3:47 PM
5	The district has put together many materials and in some documents the Districts finds that certain types of projects would not have significant impacts (projects generating less than 10,000 vehicles/day, construction less than six months). However, in our experience, District Staff has not been able to confirm whether lead agencies can rely on these statements. As mentioned in the above responses, the single source threshold for health risks does not make sense for siting new receptors. There is also no guidance on what a cumulatively considerable contribution would be. There is no rationale as for how short term construction projects may translate into long term health risk impacts. There is no rationale as to why the District is applying the OEHHA age sensitivity factors to all TACs, and not the ones identified by OEHHA. There is no guidance on effective mitigation for construction health risks and siting new receptors in an area where the single and/or cumulative thresholds are exceeded. (Effectively, the threshold is the single source threshold.)	May 3, 2011 11:53 AM
6	The district has put together many materials and in some documents the Districts finds that certain types of projects would not have significant impacts (projects generating less than 10,000 vehicles/day, construction less than six months). However, in our experience, District Staff has not been able to confirm whether lead agencies can rely on these statements. As mentioned in the above responses, the single source threshold for health risks does not make sense for siting new receptors. There is also no guidance on what a cumulatively considerable contribution would be. There is no rationale as for how short term construction projects may translate into long term health risk impacts. There is no rationale as to why the District is applying the OEHHA age sensitivity factors to all TACs, and not the ones identified by OEHHA. There is no guidance on effective mitigation for construction health risks and siting new receptors in an area where the single and/or cumulative thresholds are exceeded. (Effectively, the threshold is the single source threshold.)	May 3, 2011 8:46 AM
7	Some BAAQMD summary documents didn't make it clear that the Plan-level GHG criteria only applied to General Plans (not Specific Plans like ours). This was clear in the full Guidelines themselves, but not in the summaries.	May 2, 2011 6:18 PM

Q8. What, if anything, do you find confusing or unclear about the 2010 CEQA Guidelines?

8	<p>The district has put together many materials and in some documents the Districts finds that certain types of projects would not have significant impacts (projects generating less than 10,000 vehicles/day, construction less than six months). However, in our experience, District Staff has not been able to confirm whether lead agencies can rely on these statements. As mentioned in the above responses, the single source threshold for health risks does not make sense for siting new receptors. There is also no guidance on what a cumulatively considerable contribution would be. There is no rationale as for how short term construction projects may translate into long term health risk impacts. There is no rationale as to why the District is applying the OEHHA age sensitivity factors to all TACs, and not the ones identified by OEHHA. There is no guidance on effective mitigation for construction health risks and siting new receptors in an area where the single and/or cumulative thresholds are exceeded. (Effectively, the threshold is the single source threshold.)</p>	May 2, 2011 12:40 PM
9	<p>The district has put together many materials and in some documents the Districts finds that certain types of projects would not have significant impacts (projects generating less than 10,000 vehicles/day, construction less than six months). However, in our experience, District Staff has not been able to confirm whether lead agencies can rely on these statements. As mentioned in the above responses, the single source threshold for health risks does not make sense for siting new receptors. There is also no guidance on what a cumulatively considerable contribution would be. There is no rationale as for how short term construction projects may translate into long term health risk impacts. There is no rationale as to why the District is applying the OEHHA age sensitivity factors to all TACs, and not the ones identified by OEHHA. There is no guidance on effective mitigation for construction health risks and siting new receptors in an area where the single and/or cumulative thresholds are exceeded. (Effectively, the threshold is the single source threshold.)</p>	May 2, 2011 11:25 AM
10	N.A.	May 2, 2011 9:57 AM
11	See above.	Apr 29, 2011 1:52 PM
12	Too many tables, thresholds. It would be nice if it could be made simpler	Apr 29, 2011 1:34 PM
13	See #7 above.	Apr 29, 2011 1:33 PM
14	They are pretty clear.	Apr 29, 2011 10:08 AM
15	<p>Comments from planning staff indicate that the confusion arises because the tools come with plug and play default values but there are so many localized values that one could customize with (which is great) that people are unsure of when to apply local or go with defaults.</p>	Apr 29, 2011 8:39 AM
16	N/A	Apr 28, 2011 10:19 PM
17	<p>That analysis of cumulative health risks is particularly problematic. While the BAAQMD guidelines are fairly clear about the method of calculating a cumulative impact, there is no clear guidance about what constitutes a significant project contribution to the cumulative impact. Is it one molecule? Assuredly not, but the BAAQMD needs to clarify more precisely what the level should be. The obvious answer is the level associated with a significant project impact. But regardless of the answer, the BAAQMD are fatally flawed without a specific level for a cumulatively considerable project contribution.</p>	Apr 28, 2011 7:01 PM

Q8. What, if anything, do you find confusing or unclear about the 2010 CEQA Guidelines?

18	<p>The district has put together many materials and in some documents the Districts finds that certain types of projects would not have significant impacts (projects generating less than 10,000 vehicles/day, construction less than six months). However, in our experience, District Staff has not been able to confirm whether lead agencies can rely on these statements. As mentioned in the above responses, the single source threshold for health risks does not make sense for siting new receptors. There is also no guidance on what a cumulatively considerable contribution would be. There is no rationale as for how short term construction projects may translate into long term health risk impacts. There is no rationale as to why the District is applying the OEHHA age sensitivity factors to all TACs, and not the ones identified by OEHHA. There is no guidance on effective mitigation for construction health risks and siting new receptors in an area where the single and/or cumulative thresholds are exceeded. (Effectively, the threshold is the single source threshold.) The relationship between project level GHG quantification and municipal climate plan GHG inventory practices is not clear. Since the District has chosen to grant the option of a “Qualified Climate Action Strategy” it should provide clarification on the nature of this type of strategy vs the common municipal climate action plan.</p>	Apr 28, 2011 6:32 PM
19	<p>After using threshold criteria, deciding what comes next.</p>	Apr 28, 2011 4:11 PM
20	<p>We do not support the construction impact methodologies. The TAC is especially hard to understand what is the basis for it and why it should be done for such a limited exposure.</p>	Apr 28, 2011 2:39 PM
21	<p>Cumulative cancer risk for TACs.</p>	Apr 28, 2011 1:56 PM
22	<p>The district has put together many materials and in some documents the Districts finds that certain types of projects would not have significant impacts (projects generating less than 10,000 vehicles/day, construction less than six months). However, in our experience, District Staff has not been able to confirm whether lead agencies can rely on these statements. As mentioned in the above responses, the single source threshold for health risks does not make sense for siting new receptors. There is also no guidance on what a cumulatively considerable contribution would be. There is no rationale as for how short term construction projects may translate into long term health risk impacts. There is no rationale as to why the District is applying the OEHHA age sensitivity factors to all TACs, and not the ones identified by OEHHA. There is no guidance on effective mitigation for construction health risks and siting new receptors in an area where the single and/or cumulative thresholds are exceeded. (Effectively, the threshold is the single source threshold.)</p>	Apr 28, 2011 1:10 PM
23	<p>It has taken me months to understand how to apply these new thresholds and analysis tools to my projects, and there seem to be frequent updates to methodologies.</p>	Apr 28, 2011 11:29 AM

Q8. What, if anything, do you find confusing or unclear about the 2010 CEQA Guidelines?

24	The district has put together many materials and in some documents the Districts finds that certain types of projects would not have significant impacts (projects generating less than 10,000 vehicles/day, construction less than six months). However, in our experience, District Staff has not been able to confirm whether lead agencies can rely on these statements. As mentioned in the above responses, the single source threshold for health risks does not make sense for siting new receptors. There is also no guidance on what a cumulatively considerable contribution would be. There is no rationale as for how short term construction projects may translate into long term health risk impacts. There is no rationale as to why the District is applying the OEHHA age sensitivity factors to all TACs, and not the ones identified by OEHHA. There is no guidance on effective mitigation for construction health risks and siting new receptors in an area where the single and/or cumulative thresholds are exceeded. (Effectively, the threshold is the single source threshold.)	Apr 28, 2011 10:31 AM
25	Is a Climate Action Plan to address AB32 GHG targets a "lplan" for the purposes of needing to assess consistency as regards "plans" against which a project must be tested. Meaning is the failure to address meeting AB32 targets comprise missing data	Apr 27, 2011 3:48 PM
26	The consultant initially did not realize that the analysis was based on the net increase over existing conditions, which delayed the project.	Apr 27, 2011 11:32 AM
27	No	Apr 27, 2011 9:29 AM
28	N/A	Apr 26, 2011 12:26 PM
29	Finding and applying the screening tables is difficult.	Apr 26, 2011 9:10 AM
30	The GHG thresholds need to be refined to better deal with the reality of the impact.	Apr 25, 2011 8:29 AM
31	Actually, BAAQMD staff has been very responsive when I've requested clarification.	Apr 25, 2011 8:29 AM
32	Until I spoke with Air District staff I didn't understand there were screening criteria for projects. This should be more clear to anyone using the guidelines, not just staff that have attended training	Apr 22, 2011 2:16 PM
33	Not applicable	Apr 22, 2011 12:54 PM
34	Trying to determine appropriate off sight mitigations for a project that exceeds the trip threshold.	Apr 22, 2011 11:47 AM
35	Why the district has developed CEQA Guidelines for an area that the state legislature has delegated to cal recycle.	Apr 22, 2011 8:39 AM
36	Not related to air quality, but establishing thresholds for impacts to tranist, pedsetrians, and bicycles is difficult.	Apr 21, 2011 6:33 PM

Q9. Which elements, outlined below, of the 2010 CEQA Guidelines do you find helpful? Please check all that apply.

1	GHG thresholds well done, well thought out.	May 5, 2011 4:21 PM
2	plus an occasional telephone call to district staff	May 4, 2011 5:20 PM
3	Although there are many problems with the tools, they do allow lead agencies to be able to take a first cut at screening a project. The problems with the tools should be easily fixed by clearly documenting the methodology for developing the tools and having the tools peer reviewed before having the entire region relying on incorrect information. As mentioned before, the guidance on the methodologies are suspect, especially as they relate to project-level GHG quantification and construction health risks from very short duration (and low intensity) activities. The use of the OEHHA age sensitivity factors by the District should be confirmed with OEHHA. As mentioned before, the district has not developed useful mitigation measures for air toxics.	May 3, 2011 11:53 AM
4	Although there are many problems with the tools, they do allow lead agencies to be able to take a first cut at screening a project. The problems with the tools should be easily fixed by clearly documenting the methodology for developing the tools and having the tools peer reviewed before having the entire region relying on incorrect information. As mentioned before, the guidance on the methodologies are suspect, especially as they relate to project-level GHG quantification and construction health risks from very short duration (and low intensity) activities. The use of the OEHHA age sensitivity factors by the District should be confirmed with OEHHA. As mentioned before, the district has not developed useful mitigation measures for air toxics.	May 3, 2011 8:46 AM
5	Although there are many problems with the tools, they do allow lead agencies to be able to take a first cut at screening a project. The problems with the tools should be easily fixed by clearly documenting the methodology for developing the tools and having the tools peer reviewed before having the entire region relying on incorrect information. As mentioned before, the guidance on the methodologies are suspect, especially as they relate to project-level GHG quantification and construction health risks from very short duration (and low intensity) activities. The use of the OEHHA age sensitivity factors by the District should be confirmed with OEHHA. As mentioned before, the district has not developed useful mitigation measures for air toxics.	May 2, 2011 12:40 PM
6	Although there are many problems with the tools, they do allow lead agencies to be able to take a first cut at screening a project. The problems with the tools should be easily fixed by clearly documenting the methodology for developing the tools and having the tools peer reviewed before having the entire region relying on incorrect information. As mentioned before, the guidance on the methodologies are suspect, especially as they relate to project-level GHG quantification and construction health risks from very short duration (and low intensity) activities. The use of the OEHHA age sensitivity factors by the District should be confirmed with OEHHA. As mentioned before, the district has not developed useful mitigation measures for air toxics.	May 2, 2011 11:25 AM
7	I'm still getting familiar with all of these.	Apr 29, 2011 4:26 PM
8	All of those will be helpful.	Apr 29, 2011 1:52 PM
9	The risk reduction strategies suggested in recent guidance is not useful.	Apr 29, 2011 10:08 AM
10	N/A	Apr 28, 2011 10:19 PM

Q9. Which elements, outlined below, of the 2010 CEQA Guidelines do you find helpful? Please check all that apply.

11	No comment.	Apr 28, 2011 7:01 PM
12	Although there are many problems with the tools, they do allow lead agencies to be able to take a first cut at screening a project. The problems with the tools should be easily fixed by clearly documenting the methodology for developing the tools and having the tools peer reviewed before having the entire region relying on incorrect information. As mentioned before, the guidance on the methodologies are suspect, especially as they relate to project-level GHG quantification and construction health risks from very short duration (and low intensity) activities. The use of the OEHHA age sensitivity factors by the District should be confirmed with OEHHA. As mentioned before, the district has not developed useful mitigation measures for air toxics.	Apr 28, 2011 6:32 PM
13	Although there are many problems with the tools, they do allow lead agencies to be able to take a first cut at screening a project. The problems with the tools should be easily fixed by clearly documenting the methodology for developing the tools and having the tools peer reviewed before having the entire region relying on incorrect information. As mentioned before, the guidance on the methodologies are suspect, especially as they relate to project-level GHG quantification and construction health risks from very short duration (and low intensity) activities. The use of the OEHHA age sensitivity factors by the District should be confirmed with OEHHA. As mentioned before, the district has not developed useful mitigation measures for air toxics.	Apr 28, 2011 1:10 PM
14	I have found the guidelines have provided legal uncertainty as the Air District has told me that their guidance is only suggestive and not binding. However, in providing thresholds a fair argument can be made if a lead agency does not adhere to the thresholds. Analysis methodologies seem to change every couple of months, which makes it difficult to ensure an analysis underway is still accurate after an update. The Air District has not provided clear guidance on the use of filtration as a mitigation measure for PM2.5 exceedance. This has been frustrating for project sponsors, the lead agency, and all involved in many projects. The screening tables have not been helpful as all of my projects are mixed use and would perform construction activities near a sensitive receptor.	Apr 28, 2011 11:29 AM
15	Although there are many problems with the tools, they do allow lead agencies to be able to take a first cut at screening a project. The problems with the tools should be easily fixed by clearly documenting the methodology for developing the tools and having the tools peer reviewed before having the entire region relying on incorrect information. As mentioned before, the guidance on the methodologies are suspect, especially as they relate to project-level GHG quantification and construction health risks from very short duration (and low intensity) activities. The use of the OEHHA age sensitivity factors by the District should be confirmed with OEHHA. As mentioned before, the district has not developed useful mitigation measures for air toxics.	Apr 28, 2011 10:31 AM
16	We need a lot more standard "mitigations" approved by BAAQMD that if applied would allow infill projects otherwise exempt to be exempt. Because almost all development sites in Berkeley are affected by the new PM 2.5 and 10 standards, we will need to prepare a Health Risk Reduction Plan - but have no resources to do so. Making significant grants for this purpose available to local jurisdictions most affected by these new standards is essential - as virutally no one can undertake this at this time without those resources (and small "competitive grants" that do not cover the full cost of doing this will not be helpful - we don't even have matching money for this purpose at this time).	Apr 26, 2011 2:42 PM

Q9. Which elements, outlined below, of the 2010 CEQA Guidelines do you find helpful? Please check all that apply.

- | | | |
|----|---|-----------------------|
| 17 | Specific guidance about what to do is always helpful. I'm not sufficiently knowledgeable about these Guidelines or the tools developed for implementing them to make comments that are any more specific, but the direction implied in the question certainly sounds like a good one. | Apr 22, 2011 12:54 PM |
|----|---|-----------------------|

Q10. Would additional training sessions from the Air District on the CEQA Guidelines or our analytical tools be helpful? If yes, on what topic(s)?

1	Need much more technical assistance on Health Hazards Risk. 1) Mapping Assistance 2) Provide data for stationary sources 3) Provide quantifiable mitigation measures.	May 5, 2011 4:21 PM
2	I think what could help us is not some general, overview-type presentation from the district, but - rather - a session focused on specific Bay Area project examples with which your District is familiar, as well as project examples we provide from Sonoma County.	May 4, 2011 5:20 PM
3	Training is always good. Discussion of most recent updated guidelines would be helpful.	May 4, 2011 4:16 PM
4	I attended a training on Urbemus and the GHG Calculator that I found very helpful, which was not well attended by local government staff. In the future, you may want to consider hosting an additional training on this issue. In addition, a training that provides an overview of the guidelines, methodologies, screening tools would be helpful.	May 4, 2011 3:47 PM
5	General overview of the thresholds and all the tools.	May 3, 2011 1:36 PM
6	The District should hold training sessions for all consultants and lead agencies conducting this work. An overall training session of the Guidelines is needed as some people have mistaken the criteria air pollutant screening tables as construction air toxic screening tables, and other serious misunderstandings. Another training should focus clearly on screening projects for air toxics and a third training should be designed specifically for those conducting modeling and develop a step by step training on how to run the models and what the defaults should be, how to include the age sensitivity factors, etc.	May 3, 2011 11:53 AM
7	The District should hold training sessions for all consultants and lead agencies conducting this work. An overall training session of the Guidelines is needed as some people have mistaken the criteria air pollutant screening tables as construction air toxic screening tables, and other serious misunderstandings. Another training should focus clearly on screening projects for air toxics and a third training should be designed specifically for those conducting modeling and develop a step by step training on how to run the models and what the defaults should be, how to include the age sensitivity factors, etc.	May 3, 2011 8:46 AM
8	The District should hold training sessions for all consultants and lead agencies conducting this work. An overall training session of the Guidelines is needed as some people have mistaken the criteria air pollutant screening tables as construction air toxic screening tables, and other serious misunderstandings. Another training should focus clearly on screening projects for air toxics and a third training should be designed specifically for those conducting modeling and develop a step by step training on how to run the models and what the defaults should be, how to include the age sensitivity factors, etc.	May 2, 2011 12:40 PM
9	The District should hold training sessions for all consultants and lead agencies conducting this work. An overall training session of the Guidelines is needed as some people have mistaken the criteria air pollutant screening tables as construction air toxic screening tables, and other serious misunderstandings. Another training should focus clearly on screening projects for air toxics and a third training should be designed specifically for those conducting modeling and develop a step by step training on how to run the models and what the defaults should be, how to include the age sensitivity factors, etc.	May 2, 2011 11:25 AM

Q10. Would additional training sessions from the Air District on the CEQA Guidelines or our analytical tools be helpful? If yes, on what topic(s)?

10	more practical application training for real world projects	May 2, 2011 9:21 AM
11	More training sessions on GHG emission measurement and mitigation.	Apr 29, 2011 4:26 PM
12	Existing risks and how to map and/or document them; how to use URBEMIS and other programs; info on GHG levels and published standards.	Apr 29, 2011 1:52 PM
13	Hands-on workshops with several different kinds of projects - not just a lecture w/ handouts	Apr 29, 2011 1:34 PM
14	Training on CEQA Guidelines & analytical tools.	Apr 29, 2011 1:33 PM
15	Additional training is always important.	Apr 29, 2011 10:08 AM
16	We typically rely on consultants to prepare environmental documents at the applicant's expense.	Apr 29, 2011 9:33 AM
17	I think the training videos are great so, rather than training sessions, it may be worthwhile for the Air District to do additional outreach to alert people to those videos. Also, think of efficiency: until the CRRP pilots are done and BAAQMD can provide guidance and resources to develop those in every community, maybe it's more efficient to have a core person in each planning department. This would be a person who gets well versed in these tools, knows local data and analysis that could customize default values as projects come through, and has contact with the great staff at BAAQMD; that person could serve as the intermediary / new guidelines "expert" for the time being. It may not be feasible for every planner to get up to speed at this point in time. Just a thought. I also encourage strengthened partnerships with the affordable housing community - we need to make sure those projects are quality but that they can move ahead. Infill affordable housing near transit is a huge need and, in this region, a climate change prevention strategy in and of itself.	Apr 29, 2011 8:39 AM
18	Since I can't really answer the main questions, a training about the implications of the guidelines would help clarify their role/value	Apr 28, 2011 10:19 PM
19	Mitigation measures with measurable benefits, most of the current mitigations are either infeasible or too vague.	Apr 28, 2011 8:34 PM
20	No comment.	Apr 28, 2011 7:01 PM
21	The District should hold training sessions for all consultants and lead agencies conducting this work. An overall training session of the Guidelines is needed as some people have mistaken the criteria air pollutant screening tables as construction air toxic screening tables, and other serious misunderstandings. Another training should focus clearly on screening projects for air toxics and a third training should be designed specifically for those conducting modeling and develop a step by step training on how to run the models and what the defaults should be, how to include the age sensitivity factors, etc.	Apr 28, 2011 6:32 PM
22	Any new legislation...	Apr 28, 2011 5:26 PM
23	GHG mitigation quantification; BGM spreadsheet	Apr 28, 2011 4:57 PM

Q10. Would additional training sessions from the Air District on the CEQA Guidelines or our analytical tools be helpful? If yes, on what topic(s)?

24	There should be ongoing annual opportunities for lead agency staff to receive training/refresher course on the issues, but there has been good training opportunities over the past year. Maybe a session on what is actually in EMFAC and Off-Road background and assumptions and trends for the future would be helpful.	Apr 28, 2011 2:39 PM
25	The District should hold training sessions for all consultants and lead agencies conducting this work. An overall training session of the Guidelines is needed as some people have mistaken the criteria air pollutant screening tables as construction air toxic screening tables, and other serious misunderstandings. Another training should focus clearly on screening projects for air toxics and a third training should be designed specifically for those conducting modeling and develop a step by step training on how to run the models and what the defaults should be, how to include the age sensitivity factors, etc.	Apr 28, 2011 1:10 PM
26	Technical training for all analytical tools used in the process for consultants and lead agency staff would help us follow the guidelines correctly.	Apr 28, 2011 11:29 AM
27	The District should hold training sessions for all consultants and lead agencies conducting this work. An overall training session of the Guidelines is needed as some people have mistaken the criteria air pollutant screening tables as construction air toxic screening tables, and other serious misunderstandings. Another training should focus clearly on screening projects for air toxics and a third training should be designed specifically for those conducting modeling and develop a step by step training on how to run the models and what the defaults should be, how to include the age sensitivity factors, etc.	Apr 28, 2011 10:31 AM
28	Health Risk Reduction Plans	Apr 26, 2011 2:42 PM
29	The screening tables. GHG modeling.	Apr 26, 2011 9:10 AM
30	Applying real case examples in a City (such as Redwood City) would be helpful. Our meeting with BAAQMD was really beneficial.	Apr 25, 2011 1:33 PM
31	Additional training on the use of Urbemis. Only one of our staff members has been trained to use this. Also, with the down economy, with infrequent use, people forget how to use the tool.	Apr 25, 2011 12:08 PM
32	An overview of the thresholds would be useful.	Apr 25, 2011 11:09 AM
33	Now that the guidelines have been in use for almost a year, some information on case studies would be helpful.	Apr 25, 2011 8:47 AM
34	Project-specific assistance would be more helpful, since we don't process that many projects in a typical year that are subject to this level of review.	Apr 25, 2011 8:29 AM
35	perhaps just more often training sessions.	Apr 22, 2011 2:16 PM
36	N/A	Apr 22, 2011 12:54 PM
37	Guidance on useful mitigation measures	Apr 22, 2011 11:47 AM
38	The tools that the Air District has developed to assist cities, i.e. Urbemis, screening tables,	Apr 22, 2011 10:04 AM

Q10. Would additional training sessions from the Air District on the CEQA Guidelines or our analytical tools be helpful? If yes, on what topic(s)?

39	General training on all aspects of air quality and evaluating impacts and exposures	Apr 22, 2011 9:52 AM
40	Additional training would be helpful if and when you modify the Guidelines or tools.	Apr 22, 2011 9:25 AM
41	All	Apr 21, 2011 3:52 PM

Q11. Please provide any additional questions or comments on the 2010 CEQA Guidelines:

1	As we discussed - strongly encourage close coordination with our office. I have inquired of all other cities in the South Bay and none seem to be prepared to implement the thresholds. The County would like to complete mapping of the Main Freeways and Roads to assist not only ourselves but also the other cities in providing a systematic way of analyzing for Health Hazards Risks with new projects.	May 5, 2011 4:21 PM
2	We think your guidelines, and particularly your just updated CEQA Guidelines and associated tools, represent a fabulous resource, and we very much appreciate your district efforts on these ... as we continue to learn to use them properly!!	May 4, 2011 5:20 PM
3	These comments are based on a commercial wind energy project EIR in Solano County, which spans two different air quality districts; much of the project is either not subject BAAQMD guidelines or specific guidelines are not applicable. Solano County Public Works - Engineering Division has negative experience enforcing requirements for alternative fuels. These are believed to be non-beneficial because they, overall, create greater air quality impacts than without. Problems cited include construction equipment failure, increased fuel use, equipment power loss, and equipment warranty issues.	May 4, 2011 4:16 PM
4	I have been very impressed by your extensive outreach on this subject. Keep up the good work!	May 3, 2011 1:36 PM
5	In this time of limited government and private sector funding, it's irresponsible for BAAQMD to overextend its mandate by creating undue complexity that requires agencies and project sponsors to spend time and money performing analyses of questionable use. BAAQMD should focus on its madate of regulating the sources of air pollution rather than analyzing its impacts. CEQA should not be a substitute for regional planning. BAAQMD needs to coordinate better with other regional planning agencies.	May 3, 2011 11:53 AM
6	Please see all of the above responses. In the current environment, we have adopted thresholds and insufficient tools to analyze projects against those thresholds. The District should convene technical work groups with City department and air quality specialists to address the issues identified through this survey and issues with the guidelines that were previously transmitted to the District. Until then, lead agencies will be very uncertain as to how to be compliant with the new guidelines and thresholds. Many, if not all, of the concerns mentioned in this survey response have been transmitted to District Staff.	May 3, 2011 8:46 AM
7	Thanks for the opportunity to comment. We are hoping BAAQMD will review our Draft EIR and comment on whether our analysis was too conservative in any area, or whether it had any other potential errors.	May 2, 2011 6:18 PM
8	We haven't prepared a CEQA document since November of 2009, so we haven't had a chance to try out your tools. But thanks for asking.	May 2, 2011 4:17 PM
9	Please see all of the above responses. In the current environment, we have adopted thresholds and insufficient tools to analyze projects against those thresholds. The District should convene technical work groups with City department and air quality specialists to address the issues identified through this survey and issues with the guidelines that were previously transmitted to the District. Until then, lead agencies will be very uncertain as to how to be compliant with the new guidelines and thresholds. Many, if not all, of the concerns mentioned in this survey response have been transmitted to District Staff.	May 2, 2011 12:40 PM

Q11. Please provide any additional questions or comments on the 2010 CEQA Guidelines:

10	Please see all of the above responses. In the current environment, we have adopted thresholds and insufficient tools to analyze projects against those thresholds. The District should convene technical work groups with City department and air quality specialists to address the issues identified through this survey and issues with the guidelines that were previously transmitted to the District. Until then, lead agencies will be very uncertain as to how to be compliant with the new guidelines and thresholds. Many, if not all, of the concerns mentioned in this survey response have been transmitted to District Staff.	May 2, 2011 11:25 AM
11	Thanks for requesting our feedback	Apr 29, 2011 1:34 PM
12	The survey forced me to answer no to questions #3 and #4. A more accurate answer would be "not applicable."	Apr 29, 2011 10:08 AM
13	People are really concerned about S.B. 375 / Plan Bay Area and how the new Guidelines seem to run up against allowing us to better accommodate projected growth. When the information is actually determined, assurances and insights into how these will be reconciled and can work together will be incredibly helpful to some very nervous planners and local leaders. Developing and implementing the new Guidelines and tools is clearly a huge and challenging task, but a necessary one if we are to protect the health of our communities, our region, our planet. Thank you, BAAQMD staff, for all you're doing to try to make the transition easier, we're happy to help in anyway we can to roll this out in San Mateo County.	Apr 29, 2011 8:39 AM
14	No comment.	Apr 28, 2011 7:01 PM
15	Please see all of the above responses. In the current environment, we have adopted thresholds and insufficient tools to analyze projects against those thresholds. The District should convene technical work groups with City department and air quality specialists to address the issues identified through this survey and issues with the guidelines that were previously transmitted to the District. Until then, lead agencies will be very uncertain as to how to be compliant with the new guidelines and thresholds. Many, if not all, of the concerns mentioned in this survey response have been transmitted to District Staff. To emphasize, the District should clarify if it is indeed its intention to create a need for all municipal climate action plans to undergo CEQA review per the new Guidelines or not. Per the new guidelines municipalities are under the impression that CEQA review will be necessary on what have traditionally been high level visioning documents. Further distinction between and clarification on the requirements of (if any) Climate Action Plans, the "Qualified Climate Action Strategy" and project level GHG assessments is needed. Scare funds should be allocated to mitigation and community development.	Apr 28, 2011 6:32 PM
16	Personally, I have too few CEQA-reliant projects to make fair assessment of Guidelines and tools.	Apr 28, 2011 4:57 PM
17	The GHG thresholds as currently adopted are a strong incentive for completing a Greenhouse Gas Reduction Strategy.	Apr 28, 2011 1:56 PM

Q11. Please provide any additional questions or comments on the 2010 CEQA Guidelines:

18	Please see all of the above responses. In the current environment, we have adopted thresholds and insufficient tools to analyze projects against those thresholds. The District should convene technical work groups with City department and air quality specialists to address the issues identified through this survey and issues with the guidelines that were previously transmitted to the District. Until then, lead agencies will be very uncertain as to how to be compliant with the new guidelines and thresholds. Many, if not all, of the concerns mentioned in this survey response have been transmitted to District Staff.	Apr 28, 2011 1:10 PM
19	Jessica Range is the lead AQ specialist for the San Francisco Planning Department and has provided valuable feedback to BAAQMD on their Guidelines. I fully support her comments to the Air District as she provides all Planning staff and consultants in San Francisco with guidance on complying with the Guidelines. She has identified key issues and solutions for how to work them out and I strongly suggest the Air District take her suggestions into consideration.	Apr 28, 2011 11:29 AM
20	Please see all of the above responses. In the current environment, we have adopted thresholds and insufficient tools to analyze projects against those thresholds. The District should convene technical work groups with City department and air quality specialists to address the issues identified through this survey and issues with the guidelines that were previously transmitted to the District. Until then, lead agencies will be very uncertain as to how to be compliant with the new guidelines and thresholds. Many, if not all, of the concerns mentioned in this survey response have been transmitted to District Staff.	Apr 28, 2011 10:31 AM
21	Please consider credits for infill development along transit corridors. In my opinion, the San Antonio Center project should not have needed to have overriding considerations based on its proximity to transit, location on major roads.	Apr 27, 2011 11:32 AM
22	Most practitioners in smaller communities are generalists. The organization is not large enough for specialists. Generalists look for easily administered thresholds, beyond which analysis is handed over to consultants (usually at a significant cost to the project). A reasonable size threshold for small scale non-residential (including neighborhood commercial, industrial, and mixed use) is needed,	Apr 26, 2011 5:21 PM
23	N/A	Apr 26, 2011 12:26 PM
24	Please see comments in Number 6 above. More thought needs to be made on exempting from these regulations sustainable infill development that implements AB32/SB375.	Apr 25, 2011 12:08 PM
25	Since development is still slow in our community, we have not yet encountered too many issues with the District's 2010 CEQA Guidelines. However, we anticipate that this may change as the economy picks up and new projects are submitted. The biggest issue seems to be the particulates impacts adjacent to the freeway and railroad. We are reviewing a couple of projects now that will give us an indication of the challenges we may face in the future to address air quality impacts.	Apr 25, 2011 8:47 AM

Q11. Please provide any additional questions or comments on the 2010 CEQA Guidelines:

26	The City of Oakland supports healthy infill development. The focus of air quality impact review should be on identifying the BMPs, that if incorporated reduce impact to less than significant (like dust control), instead of doing expensive studies. The City would rather not spend \$25,000 - \$50,000 on an air quality study and instead have that money spent on making the project healthier.	Apr 22, 2011 9:25 AM
27	I know the District has gotten criticism for the risk and hazard thresholds, but I appreciate the screening criteria and think it's important that we find ways to construct infill housing AND be protective of public health.	Apr 22, 2011 8:30 AM
28	Thresholds for cumulative analysis of GHG emissions are needed. Additionally, thresholds for transportation-related GHG impacts should be developed.	Apr 21, 2011 6:33 PM