



These guidelines are nonbinding recommendations, intended to assist lead agencies with navigating the CEQA process. They may be updated as needed in the future, and any updates will likewise be nonbinding and advisory.

1 INTRODUCTION

1.1 PURPOSE OF GUIDELINES

The Bay Area Air Quality Management District (Air District) California Environmental Quality Act (CEQA) Guidelines (Guidelines) were developed to assist lead agencies in evaluating air quality and climate impacts from proposed land use projects and plans in the San Francisco Bay Area Air Basin (SFBAAB). The Guidelines do not replace the State CEQA Statute and Guidelines; rather, they are designed to provide Air District-recommended procedures for evaluating potential air quality and climate impacts during the environmental review process that are consistent with CEQA requirements. These revised Guidelines supersede the Air District's previous CEQA guidance titled BAAQMD CEQA Air Quality Guidelines (BAAQMD 2017).

Land use projects and plans have the potential to generate air pollutants (and precursors) that contribute to the degradation of regional air quality, increase the exposure of local populations to harmful pollutants, and contribute to climate change. These Guidelines contain instructions and examples for how a lead agency can evaluate, measure, and mitigate air quality and climate impacts generated from land use construction and operational activities. They focus on generated emissions of criteria air pollutants and precursors, toxic air contaminants, GHGs, and odors from local plans and projects.

1.1.1 California Environmental Quality Act

When a lead agency takes a discretionary action that may have an environmental impact, the agency must undertake CEQA review to inform decision makers and the public about potentially significant impacts and identify measures to reduce them. These Guidelines are intended to assist lead agencies with navigating the CEQA process by providing recommended thresholds of significance for air quality and climate

impacts from greenhouse gas (GHG) emissions, and by providing approaches for determining significance and mitigating impacts. **Recommendations in these Guidelines are advisory and should be followed by local governments at their own discretion.** These Guidelines may be updated as needed in the future, and any updates will likewise be non-binding and advisory. These Guidelines offer step-by-step procedures for conducting a thorough review of environmental impacts related to air quality and climate change. They may inform environmental review of land use projects in the SFBAAB but do not commit local governments or the Air District to any specific course of regulatory action.

These Guidelines also promote sustainable land use projects and plans in the region by providing resources that offer numerous air quality and climate impact reduction measures and plan policies for lead agencies to review and consider. Implementation of these mitigation measures and policies contributes to achieving smart growth and transit-oriented goals related to land use projects and plans, reducing population exposure to air pollution risks, and addressing disproportionate impacts in communities overburdened by air pollution.

CEQA EXEMPTIONS AND STREAMLINING

Lead agencies should refer to the State CEQA Statute and Guidelines to learn about what types of projects may be exempt from environmental review. A project that is exempt from CEQA is not required to undertake further environmental review. There are two types of CEQA exemptions: statutory and regulatory. Statutory exemptions are enacted by the Legislature based on policy goals and apply regardless of whether the exempted project or class of projects may have environmental impacts. Statutory exemptions are found within CEQA itself and are also located in various other codes.¹ Many statutory exemptions are addressed in the State CEQA Guidelines, Sections 15261-15285. Within CEQA, statutory exemptions are discussed in Section 21080 et seq. and in other places, such as Section 21159.20 et seq. for special housing exemptions, and Section 21155.1 for Senate Bill 375 transit priority projects.

Most regulatory exemptions are known as categorical exemptions. These exemptions are granted to classes of projects that generally are considered not to have any potential impacts on the environment and are found in the State CEQA Guidelines at Sections 15301-15333. The State CEQA Guidelines also codify the “common sense” exemption. This exemption can be used for projects “[w]here it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment” (State CEQA Guidelines Section 15061[b][3]). Note that some categorical exemptions and the common sense exemption may not apply if emissions from toxic air contaminants warrant further review.

Because only a handful of exemptions apply to housing projects (i.e., Class 1, Class 2, and Class 32 categorical exemptions), it is more common for these projects to be “streamlined” through CEQA than for them to qualify for an exemption. Environmental review streamlining involves a lighter level of analysis for a project than is typically required under CEQA. The extent to which a project is streamlined varies depending on the qualifying conditions. To qualify for streamlining opportunities, projects must satisfy certain criteria, such as

¹ This includes other areas of the Public Resources Code as well as the Business and Professions, Education, Fish and Game, Government, Health and Safety, Military and Veterans, Penal, Water, and Welfare and Institutions Codes (See OPR, Technical Advisory: CEQA Exemptions Outside of the CEQA Statute (2018), available at https://opr.ca.gov/ceqa/docs/20180606-Tech_Advisory_CEQA_Exemptions.pdf). Further, not all statutory exemptions have been codified.

location within an urbanized area or a certain distance from transit, or coverage by a specific plan's environmental review. The Governor's Office of Planning and Research (OPR) has developed advisories and tools to assist with the acceleration of housing production by facilitating planning decisions and clarifying where existing streamlining opportunities under CEQA apply. OPR's *Technical Advisory: CEQA Review of Housing Projects* (OPR 2020) provides a list of statutes, regulations, and requirements for streamlined review of housing projects. In addition, OPR's Site Check platform (OPR n.d.) allows practitioners to select parcels of interest and generates reports on potential accelerated pathways to CEQA compliance.

1.1.2 Role of the Air District

The Air District is the primary agency responsible for ensuring that the national and California ambient air quality standards are attained and maintained in the SFBAAB. The Air District's jurisdiction includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties, the southern portion of Sonoma County, and the southwestern portion of Solano County, as shown in Figure 1-1. The Air District's responsibilities related to improving air quality in the region include preparing plans for attaining and maintaining air quality standards, adopting and enforcing rules and regulations, issuing permits for stationary sources of air pollutants, inspecting stationary sources and responding to citizen complaints, monitoring air quality and meteorological conditions, awarding grants to reduce mobile emissions, implementing public outreach campaigns, working with overburdened and impacted communities to reduce local sources of emissions, and assisting local governments in reducing GHG emissions.

The Air District takes on one of several roles in the CEQA process, depending on the nature of the proposed project:

Lead agency – The Air District acts as a lead agency when it has the primary authority to implement or approve a project, such as when it adopts rules and regulations or, in certain circumstances, when it issues stationary source permits. As lead agency, the Air District completes the environmental review and prepares all necessary environmental documents for the project.

Responsible agency – The Air District acts as a responsible agency when it has discretionary authority over a portion of a project (e.g., a stationary source, such as a backup generator or boiler requiring an Air District permit) but is not the primary discretionary authority. As a responsible agency, the Air District may coordinate the environmental review process with the lead agency regarding the Air District's permitting process including whether the project may be subject to additional conditions as part of the permitting process, provide comments to the lead agency regarding potential impacts, and recommend mitigation measures.

Commenting agency – The Air District may act as a commenting agency when it is not a lead or responsible agency but has concerns about the air quality or GHG emissions of a proposed project or plan. As a commenting agency, the Air District may review environmental documents prepared for projects and plans in the region and provide comments to the lead agency regarding the adequacy of the air quality or GHG impact analysis, determination of significance, and mitigation measures proposed.

Figure 1-1 Bay Area Air Quality Management District Jurisdictional Boundaries



1.2 GUIDELINES COMPONENTS

The recommendations in these Guidelines should be viewed as minimum considerations for analyzing air quality and climate impacts. Lead agencies are encouraged to tailor impact analyses to meet the needs of the local community and may conduct refined analyses using more sophisticated models, more precise input data, innovative mitigation measures, or other features.

The Guidelines are comprised of the following chapters:

Chapter 1, “Introduction” – The Introduction provides a summary of the purpose of the Guidelines, an overview of Air District responsibilities, and a summary of the Guidelines’ components.

Chapter 2, “Best Practices for Centering Environmental Justice, Health and Equity” – The purpose of this chapter is to provide lead agencies with best practices on centering Environmental Justice, health, and equity in the siting, design, and development of land use projects.

Chapter 3, “Thresholds of Significance” – This chapter outlines the current thresholds of significance for determining the significance of air pollutants and climate impacts.

Chapter 4, “Screening for Criteria Air Pollutants and Precursors” – This chapter provides easy-reference tables to determine whether projects may have potentially significant criteria air pollutant impacts requiring a detailed analysis.

Chapter 5, “Project-Level Air Quality Impacts” – This chapter provides guidance on how to conduct an air quality analysis at the project level, as well as a project-level cumulative impact analysis.

Chapter 6, “Project-Level Climate Impacts” – This chapter provides guidance on applying the Air District’s thresholds of significance for climate impacts from GHG emissions to projects, including land use and stationary source projects.

Chapter 7, “Plan-Level Impacts” – This chapter presents guidance on conducting plan-level air quality impacts and applying plan-level climate impact thresholds to plans.

Chapter 8, “Mitigating Air Quality and Climate Impacts” – This chapter provides recommendations for mitigating air quality and climate impacts for land use plans and projects.

The Guidelines include the following appendices that provide additional technical detail and information that may be helpful to lead agencies and practitioners:

Appendix A, “Thresholds of Significance Justification” – This appendix is the Air District’s 2010 *Thresholds of Significance* document explaining the rationale for the air quality thresholds.

Appendix B, “CEQA Thresholds for Evaluating the Significance of Climate Impacts” – This appendix presents the rationale for the Air District’s recommended thresholds of significance for use in determining whether a proposed project will have a significant impact on climate change.

Appendix C – “Guidance for Greenhouse Gas Reduction Strategies” – This appendix is designed to assist users in developing community-scale greenhouse gas (GHG) reduction strategies that are aligned with the State CEQA Guidelines Section 15183.5(b)(1) and (2) and meet the Air District’s plan-level GHG threshold of significance.

Appendix D, "Using CalEEMod for Bay Area Projects" – This appendix provides guidance on using the California Emissions Estimator Model (CalEEMod) modeling tool for Bay Area projects.

Appendix E, "Recommended Methods for Screening and Modeling Local Risks and Hazards" – This appendix provides guidance for conducting individual project and cumulative cancer risk and hazards analysis as part of their environmental review.

Appendix F – Glossary of terms used throughout this guide.

And lastly, resources to assist lead agencies in analyzing and reducing air quality and climate impacts from proposed land use projects and plans are available on the Air District [CEQA Resources](#) webpage, including the Mixed Land Use Screening Tool for Criteria Pollutants and Precursors discussed in Chapter 4 and the screening tools discussed in Appendix E.

1.2.1 Early Consultation

The Air District encourages consultation between the lead agency and project applicant as early as possible in the project planning stage. Consultation should focus on potential air quality and GHG concerns and opportunities to minimize impacts before substantial resources (public and private) have been devoted to the project. Addressing land use and site design issues while a project is still in the conceptual stage increases options to incorporate project design features to minimize land use compatibility issues and air quality and GHG impacts. By the time a project enters the CEQA process, it is usually more costly and time-consuming to redesign the project to include mitigation measures.

The following air quality and GHG considerations warrant particular attention during early consultation between lead agencies and project applicants: land uses and design features that minimize use of single-occupancy vehicles, conserve energy, reduce project emissions, and eliminate fossil fuel reliance; land uses and design features that minimize or eliminate the exposure of sensitive receptors to odors, toxic air contaminants, and criteria air pollutants; and application of all relevant Air District rules, regulations, and permit requirements.

1.3 REFERENCES

BAAAQMD. See Bay Area Air Quality Management District.

Bay Area Air Quality Management District, 2017 (May). California Environmental Quality Act Air Quality Guidelines. Available: https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed February 28, 2022.

Governor's Office of Planning and Research. 2020 (January). *Technical Advisory: CEQA Review of Housing Projects*. Available: https://opr.ca.gov/docs/20190208-TechAdvisory-Review_of_Housing_Exemptions.pdf. Accessed February 28, 2022.

———. n.d. Site Check website. Available: <https://sitecheck.opr.ca.gov/>. Accessed February 28, 2022.

OPR. See Governor's Office of Planning and Research.