



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.

7 PLAN-LEVEL IMPACTS

7.1 OVERVIEW OF PLANS

This chapter presents the Air District’s guidance on how to analyze and apply the plan-level air quality and climate impact thresholds. As a general principle, the guidance offered in this chapter should be applied to discretionary, program-level planning activities, whereas the project-level guidance presented in Chapters 5 and 6 should be applied to individual project-specific approvals, such as a proposed land use project.

Long-range plans typically contain strategies implemented over a 20-year, or longer, time horizon and include or rely upon discretionary planning activities (e.g., zoning). Local long-range plans include general plans and general plan elements, specific plans, area plans, communitywide plans, congestion management plans, and annexations of lands and service areas. Communitywide plans to reduce greenhouse gas (GHG) emissions—often referred to as climate action plans—are long-range plans that include policies, ordinances, and programs to reduce GHG emissions over 20-to-30-year timeframe. Climate action plans often address additional aspects of sustainability, such as community resiliency, adaptation, equity, and environmental justice, and typically are updated every 3–5 years.

Regional plans are assessed differently than local long-range plans because of their unique characteristics and because they do not establish land use designations. Regional plans include the Regional Transportation Plan (i.e., Plan Bay Area) prepared by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG).

7.2 AIR QUALITY IMPACTS

The following describes how to analyze and apply the plan-level air quality thresholds of significance to determine if a local long-range plan has a less-than-significant impact for criteria air pollutants and precursors (Section 7.2.1), local risks and hazards (Section 7.2.2) and odors (Section 7.2.3).

7.2.1 Criteria Air Pollutants and Precursors

For a long-range plan to have a less-than-significant impact related to criteria air pollutant and precursor impacts, the plan must satisfy two requirements: It must be consistent with current air quality plan (AQP) control measures, and the proposed plan's projected growth rate of vehicle activity in VMT or vehicle trips must be less than or equal to the projected population growth rate.

Confirm consistency with air quality plans

AQPs include clean air plans prepared per the California Clean Air Act, state implementation plans prepared per the federal Clean Air Act, and community emission reduction plans (CERPs) adopted by the Air District per AB 617. The Air District's most current clean air plans are the [2017 Clean Air Plan: Spare the Air, Cool the Climate](#) and the [Owning the Air: The West Oakland Community Action Plan](#). Note that as of June 2022, CERPs are under development in Richmond/North Richmond/San Pablo and in East Oakland. Lead agencies and other interested parties should check with the Air District about the current status of [CERPs in the Bay Area](#). In addition, other regional agencies and local jurisdictions adopt plans that include air quality policies. These include the MTC/ABAG [Plan Bay Area](#), as well as local jurisdiction air quality policies within general plans or other adopted plans.

To demonstrate long-range plan consistency with AQPs, lead agencies should incorporate all feasible AQP control measures and demonstrate that the plan would not conflict with or obstruct implementation of the applicable AQPs. To guide this process, the Air District recommends that lead agencies use the questions below. If the first two questions are answered in the affirmative, and the third and final question answered in the negative, and those conclusions are supported by substantial evidence, the long-range plan is consistent with current AQPs prepared for the Bay Area.

For each applicable AQP, does the long-range plan support the primary goals?

The analysis should identify the primary goals of the AQP and discuss how the long-range plan would support the primary goals.

For each applicable AQP, does the long-range plan include all applicable control measures?

All AQP control measures should be incorporated into long-range plans or applied as mitigation measures. For any AQP control measures that are not included, a clear justification of why they were excluded, supported by substantial evidence, should be provided. Plans that incorporate all feasible control measures are considered consistent with the AQP.

For each applicable AQP, does the long-range plan disrupt or hinder implementation of any control measures?

If approval of the long-range plan would not disrupt, delay, or otherwise hinder the implementation of any AQP control measure, it would be considered consistent with the AQP. Examples of plans that may cause disruption or delay of control measures include plans that incorporate policies that encourage single-

occupancy-vehicle use and parking or policies that do not incorporate a comprehensive transportation demand management program.

Confirm that VMT or vehicle trips do not exceed population increase

A proposed long-range plan must demonstrate that the projected growth rate of vehicle activity in VMT or vehicle trips under the plan would be less than or equal to the projected population growth rate to have a less-than-significant impact on criteria air pollutants. The vehicle activity and population growth rates are to be measured in terms of percent growth from baseline year levels. For example, in a given plan area, the percent growth in annual VMT between an established baseline year and a plan's projected buildout year should be less than or equal to the percent growth in population between the same years. The growth estimates used in the analysis should be for the years covered by the plan.

7.2.2 Local Community Risks and Hazards

Identify special overlay zones around existing and proposed land uses and sources of TACs

For a long-range plan to have a less-than-significant impact related to local risks and hazards, special overlay zones should be established around existing and proposed land uses that emit toxic air contaminants (TACs) or fine particulate matter (PM_{2.5}), and at least a 500-foot overlay zone should be established on each side of all freeways, high-volume roadways,¹ railyards, Ports, rail lines using diesel locomotives. The plan should specify goals, policies, and objectives to minimize the potential impacts of TACs and PM_{2.5} sources, such as freeways and high-traffic roads, commercial distribution centers, railyards, ports, refineries, chrome platers, gasoline stations, and other industrial facilities on sensitive receptors in the special overlay zones. Lead agencies can refer to the Air District's [Planning Healthy Places](#) and the California Air Resources Board's [Air Quality and Land Use Handbook](#) for recommended planning goals, policies, and objectives to avoid or reduce impacts on sensitive receptors.

7.2.3 Odors

Identify existing and planned odor sources, and site new receptors away from these sources

For a long-range plan to have a less-than-significant impact related to odors, the locations of existing and planned odor sources should be identified for the plan area. In addition, the plan should ensure that any new receptors are not sited near an odor source. See Chapter 5, Table 5-4 for Air District–recommended odor screening distances for specific odor-generating facilities.

The long-range plan should also include policies to reduce potential odor impacts in the plan area. If odor impacts are anticipated, proposed land use policies should be reconsidered and/or an odor management plan should be developed (See Chapter 8, Mitigating Air Quality and Climate Impacts, for details). To ensure the odor management plan is implemented and enforced, it should be included in the project's Mitigation Monitoring and Reporting Program (see Chapter 8, Mitigating Air Quality and Climate Impacts).

¹ The definition of a high-volume roadway can vary depending on road type, location, and use purpose. As an example, for traffic data collection or monitoring purposes, the Federal Highway Administration typically used 50,000 AADT (annual average daily traffic) while for road dust emissions estimation the U.S. EPA uses 10,000 AADT (AP-42 method).

7.3 CLIMATE IMPACTS

Demonstrate consistency with the State's 2030 and 2045 GHG reduction and carbon neutrality goals

Long-range plans would have a less-than-significant impact related to operational GHG emissions if the plan demonstrates that it would achieve the State's 2030 GHG reduction target, consistent with the California Global Warming Solutions Act of 2016 Senate Bill 32, and the 2045 carbon neutrality goal, consistent with Executive Order B-55-18. The plan should demonstrate, through aggressive GHG reduction measures and a robust implementation and monitoring strategy, how the community will meet the 2030 target for its overall community GHG emissions. The plan should also demonstrate that it will achieve as ambitious emission reductions as technologically and financially feasible by 2045, minimizing the residual amount of emissions needed to close the gap to carbon neutrality. The plan can demonstrate consistency with the statewide carbon neutrality target by minimizing residual emissions to the greatest extent possible as a result of including all feasible measures, and by including a robust implementation strategy that maximizes the likelihood that the full GHG reduction strategy will be implemented. The plan must include a vigorous monitoring program that will continue to adjust and fine-tune the plan to ensure that it maximizes GHG reductions over time. The monitoring program should include adjusting the GHG reduction strategy as additional technologies become feasible and to account for emerging statewide policies and programs.

A long-range plan should include clear goals, policies, performance standards, and implementation measures that when fully implemented would reduce GHG emissions sufficiently to meet the State's goals. To achieve these goals, future land use projects and plans must be planned and implemented in the most GHG-efficient manner possible. The California Air Pollution Control Officers Association's (CAPCOA) has produced the *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers*². The Handbook provides a diverse set of measures that can be used to reduce GHG emissions and improve air quality. Chapter 3 of the Handbook, "Measures to Reduce GHG Emissions," includes measures by environmental sector: Construction, Energy, Lawn and Landscaping, Natural and Working Lands, Solid Waste, Transportation, Water, Refrigerants, and lists mitigation measures for the various project types along with measures to improve health and equity. Elements that make for a strong mitigation strategy include:

- ▶ a preponderance of mandatory vs. voluntary measures;
- ▶ measures that address the largest GHG emission sources;
- ▶ a focus on quality (measures likely to reduce large amounts of emissions) over quantity (many measures with small impact);
- ▶ a minimal reliance on offsets, if any, with preference for those that achieve local benefits;
- ▶ transparency in methods of quantification (assumptions and their bases, emission factors, etc.);
- ▶ and a strong implementation and monitoring strategy.

² Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers, https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf

Demonstrate consistency with the GHG Reduction Strategy criteria in State CEQA Guidelines Section 15183.5(b)

A communitywide long-range plan would have a less-than-significant impact related to operational GHG emissions if the plan demonstrates consistency with the GHG reduction strategy criteria in State CEQA Guidelines Section 15183.5(b). Additional guidance for how to achieve consistency with the State CEQA Guidelines is provided in Appendix C, "Guidance for GHG Reduction Strategies."

7.4 REGIONAL PLAN IMPACTS

Demonstrate no net increase in air quality pollutants and GHGs

Regional plans would have a less-than-significant impact related to air quality and GHG emissions if they demonstrate no net increase in criteria air pollutants, risks and hazards, and GHG emissions. To demonstrate no net increase, two comparative analyses should be completed for the projected future emissions:

- ▶ Compare the existing (base year) emissions with projected future year emissions plus the regional plan's emissions (base year/regional plan comparison).
- ▶ Compare projected future year emissions with projected future year emissions plus the regional plan's emissions (no regional plan/regional plan comparison).

If both comparative analyses demonstrate no net increase in emissions, the air quality and GHG impacts of the regional plan would be less than significant.

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