

**Bay Area Air Quality Management District**  
**Revisions to the CEQA Guidelines**

The summary of revisions below tracks the major changes Air District staff made to the CEQA Guidelines document that was published on November 2, 2009. The revisions are based on public comments and Board direction.

The revised CEQA Guidelines was published on December 7, 2009 and is available on the District’s website, <http://www.baaqmd.gov/Divisions/Planning-and-Research/Planning-Programs-and-Initiatives/CEQA-GUIDELINES.aspx>.

Revision	Changes/ Status
<b>Revisions from Response to Comments</b>	
1. Provide screening analysis and risk modeling from toxic air emissions sources and roadways. Include construction screening criteria for community risk and hazards. Provide risk tables for magnet sources.	The CEQA Guidelines contains screening tables for risks from roadways. Staff will be providing screening risk tables for unpermitted sources in the future; and will continuing work on providing additional screening tables which will be available online.
2. Provide direction on how lead agencies should calculate GHG emissions from indirect sources, including electricity use and water conveyance. Reference existing protocols and OPR guidance as appropriate.	Section 4.1.2, p.4-4, in the CEQA Guidelines contains improved guidance on quantifying direct and indirect GHG emission.
3. Consider NRDC’s standards for clean construction in the CEQA Guidelines best management practices for construction. Add language on idling at schools and phasing. Consider measure 9 in the list of additional measures to be part of basic construction mitigation measures rather than additional.	Mitigation measures that were deemed to be feasible were added in Chapter 8.
4. Streamline screening tables in Chapter 2. Clarify what GHG thresholds the screening tables refer to.	Screening tables in Chapter 3 were streamlined and clarified as recommended.
5. Define impacted communities. Provide more explanation on the CARE program.	Term defined in glossary and the CARE program is better explained in Section 5.1.4, p5-3.

Revision	Changes/ Status
6. Define and explain unscaled reductions. Provide direction on the non-quantifiable non-URBEMIS mitigation measures listed. Insert language in mitigation section that cumulatively significant projects could be approved only with a Statement of Overriding Considerations and a showing that all feasible mitigation measures have been implemented.	Section 4.3, p.4-8, clarifies unscaled mitigations and contains recommended language. Staff will continue to provide guidance on quantifying mitigation measures.
7. In Chapter 2, clarify that the first section thresholds are for projects.	Recommended clarification made in Chapter 2.
8. Clarify guidance on naturally occurring asbestos; consider recommending mitigation measures for NOA.	Section 8.3, p.8-8, contains clarified guidance on NOA and recommended mitigation measures.
9. Insert language on biogenic emissions to be consistent with the Air District's GHG Fee regulation.	Language added in Section 4.2.1, p.4-4.
10. Clarify odor impact methodology and refer to CIWMB guidance.	Section 2.5, p.2-6, and Chapter 7 were revised as recommended.
11. Provide methodology for calculating mobile emissions for mixed use projects that account for vehicle trip reduction benefits. Add language on deducting pass by trips, lead agencies, "must discuss and justify its reasoning with substantial evidence."	Appendix B-2 contains guidance for adjusting trip rates for mixed use projects and recommended language.
12. Define high volume roads.	Section 5.2.7, p.5-11, recommends assessing risks from roads with more than 10,000 vehicles per day.
13. Provide screening criteria to identify roadway intersections for CO analysis; and guidance on CO analysis for construction projects.	Section 3.3, p.3-3, contains CO screening criteria language. The language stating that construction projects need to do a CO analysis was removed in Section 6.
14. Clarify that the efficiency based GHG threshold should be used with some discretion as advised in the Thresholds Report.	Language clarified in Section 2.2, p.2-4.
15. Insert language on the no project alternative as a requirement of CEQA.	Recommended language added in Section 1.2.1, p1-5.
16. Insert language that projects should consider sources beyond a 1,000 foot zone of influence where appropriate	Recommended language added in Section 2.3, p.2-5, and Chapter 5.

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17. Provide guidance on what a community risk reduction plan should contain.	Section 5.4, p.5-18, contains guidance on CRRPs.
18. Clarify that a plan’s consistency with an SCS should not determine significance	Recommended language added in section 2.7.2, p2-9.
19. Change “maximum daily” or “daily maximum” to “average daily” or “daily average” wherever criteria pollutant thresholds are discussed, including construction and operations.	Recommended revision made throughout document.
20. The steps in Chapter 6 should be consistent with how Chapter 8 is organized.	Recommended revisions were made to Chapter 6.
21. Remove reference to Appendix F	Done.
22. Move construction mitigation URBEMIS directions to appendix.	All URBEMIS directions are found in Appendix B.
23. Include CAL and US EPA in CRRP engagement process. Consider public outreach recommendations in CRRP engagement process.	Staff will be conducting a public involvement process for the CRRP and will consider these comments at that time.
24. Consider providing guidance on methodologies for calculating loss of carbon sequestration from clearing of forest.	Staff will continue studying these suggestions and may provide guidance at a later date.
25. Staff will review the URBEMIS model emission factors for consumer products, architectural coatings, and fugitive and roadway dust and request changes as appropriate.	
26. Consider mitigation measure of mitigating GHG emissions in power plants cooling systems by using recycled water. Consider adding specific measures that address facilities with high electrical demand (data centers).	
27. Provide bibliographic citation for all referenced reports, and website links to download documents.	
28. Provide guidance on methods to establish overlay zones and buffers and what standards are to be applied for acceptable exposure levels.	
29. Consider odor methodologies for restaurants.	
30. Follow up on research on Jacobson Effect.	