SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT

CEQA GUIDELINES SECTION 15187 ENVIRONMENTAL REVIEW

1. Project Title:

San Diego Air Pollution Control District Rule 1210 – Toxic Air Contaminant Public Health Risks-Public Notification and Risk Reduction

2. Lead Agency Name and Address:

San Diego County Air Pollution Control District (District) 10124 Old Grove Road San Diego, CA 92131

3. Contact Person and Phone Number:

Eric Luther, (858) 586-2806

4. Project Location:

San Diego County

5. Description of Project:

District Rule 1210 was first adopted in 1996 to establish public notification and risk reduction thresholds and procedures for San Diego County. Rule 1210, which has not been revised since adoption, establishes the cancer risk reduction threshold as 100 in one million, which means that facilities contributing to an increased estimated cancer risk do not need to reduce their risk unless the risk is equal to or greater than 100 in one million (i.e., the likelihood that up to 100 people, out of one million equally exposed people, would contract cancer).

The District is proposing to decrease the cancer risk reduction threshold from 100 in one million to 10 in one million for the following reasons:

- Establish a health protective limit. Given the scientific data established by the Office of Environmental Health Hazard Assessment (OEHHA), which demonstrates the contaminants emitted by the facilities subject to this amendment create an increased estimated cancer risk, the District has a responsibility to require cancer risk reductions to the extent it is feasible. The rule, as proposed, allows for extensions when it is not feasible to reduce the estimated cancer risk to below the significant risk threshold. The District must consider extensions because for some industries, technology is not feasible and is still advancing.
- Align the cancer risk reduction threshold with the significant risk notification threshold, which is currently 10 in one million. It is just and necessary to reduce confirmed high risks from controllable emissions to a small number of disproportionately affected people.
- Make the cancer risk reduction threshold consistent with 11 other California air districts that have already implemented a 10 in one million cancer risk reduction threshold. California has a total of 35 local air districts and out of these 35 air districts, the five largest districts include: San Diego County Air Pollution Control District (SDAPCD); San Joaquin Valley Air Pollution Control District (Valley Air District); South Coast Air Quality Management District (South Coast AQMD); Bay Area Air Quality Management District (BAAQMD) and Sacramento Metropolitan Air Quality Management District (Sac Metro AQMD). Out of the five largest districts, SDAPCD and Valley Air District are the only districts that have a 100 in one million cancer risk reduction threshold.

South Coast AQMD has a 25 in one million cancer risk reduction threshold and Sac Metro AQMD and BAAQMD have a 10 in one million cancer risk reduction threshold.

• The District has carefully evaluated the impact of this proposal on the facilities under its jurisdiction (in San Diego County). Specifically, the District has quantified the toxic air contaminants from all facilities subject to the Air Toxics "Hot Spots" Program through the 2019 calendar year. The District has also identified the facilities that might create elevated health risks and require health risk assessments, which quantify the health risks. In accordance with State law, health risk assessments are conducted by the facilities, reviewed by OEHHA, and approved by the Air Pollution Control Officer. Under this evaluation, the District identified up to 26 facilities that may be subject to the proposed change in the cancer risk reduction threshold. For context, the District evaluated a total of approximately 400 facilities under its jurisdiction and, out of the 400 facilities evaluated, it identified up to 26 facilities that may be affected by this proposal. Based on the nature of the facilities identified, it is feasible for most of them to reduce estimated cancer risks within a 5-year period. Some facilities might need additional time to reduce the estimated cancer risk to below 10 in one million due to future technological advancements, which is why the proposed rule has provisions for extension when reducing the estimated cancer risk is not feasible.

The types of facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. These types of facilities currently have permits with the District, but it is not known which actions each facility will take to comply. The potential actions they could take include installing control devices or modifying their operations. The list of potential control devices that may be installed are baghouses, carbon adsorption and oxidation catalysts, enclosures with HEPA filters or diesel particulate filters or diesel oxidation catalysts. Adding these types of control devices will require a modification of their District permit to operate. A facility may also choose to modify their operation by paving haul roads, using soil stabilizers, increased watering of haul roads, limiting their hours of operation or relocating their operation. These types of operational changes would also be reflected in a facility's permit to operate. A facility-specific CEQA review will be conducted during permit modification to determine if proposed actions to comply with Rule 1210 risk reduction requirements could result in an environmental impact.

6. Evaluation of Environmental Impacts of the Methods of Compliance:

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The intent of the regulation is to improve air quality by reducing cancer-causing air pollutants and imposing the revised rule by the District would therefore be categorically exempt under Section 15308 of the CEQA Guidelines. Nonetheless, the methods of compliance, to the extent they are known, are analyzed herein for any significant environmental impacts pursuant to Section 15187 of the CEQA Guidelines.

To comply with this rule revision only minor modifications to existing 26 industrial facilities will be required because new facilities are required to comply with different rules. The types of facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. It is not known which actions each facility affected by this rule will take to comply. Some potential types of control equipment which may be used to comply with the rule are baghouses, carbon absorption, oxidation catalysts, diesel particulate filters, thermal oxidizers, wet gas scrubbers and electrostatic precipitators. Some alternative types of activities which may be employed to comply with the rule are paving dirt roads, watering dirt roads/piles, reducing operational throughput and or hours of operation and other minor changes to facilities or operations.

Based upon the types of facilities affected and the potential controls that may be used to comply with the rule revision, there is certainty there will be no environmental impacts or cumulative environmental impacts (as analyzed in the attachment) in the areas of aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, land use and planning, mineral resources,

population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, or wildfire. In the following document each of these areas is examined further to evaluate questions related to each topic. Evaluation of cumulative environmental impacts for the following issues are:

- Noise To comply with this rule revision only minor modifications to existing industrial facilities will be required. Therefore, no construction impacts are expected to occur as a result of this rule revision. Since these facilities are already established in the community and have existing operations producing noise impacts, there will be no additional noise impacts from control equipment or minor operational changes.
- Energy Impacts from energy usage at existing facilities are estimated as a result of control devices potentially being installed to comply with this rule revision. The high estimate is an increase of 12.17 GWh per year. This would represent an increase of 0.09% of energy used in San Diego County in the non-residential sector per year. Therefore, this is not considered to be a significant impact on energy resources.
- <u>Hazards and hazardous materials</u> To comply with this rule revision, only minor modifications to existing industrial facilities will be required. Some of the control equipment which could be used to comply with this rule may generate small quantities of hazardous materials. These facilities have existing hazardous waste permits and must follow state and local regulations which cover the storage and transfer of hazardous materials. Therefore, no increased environmental impacts are expected from the revision of this rule.
- Hydrology and Water Quality To comply with this rule revision, some facilities may choose to water dirt roads at existing industrial facilities. APCD analyzed potential water patterns at three active landfills in San Diego County that could be affected by the rule revision. This assumed watering twelve feet wide dirt roads, five miles in length, twice a day. The total water increase using high water use assumptions would be 0.02% of existing commercial/industrial water use in San Diego county. Therefore, the rule revision is not considered to be a significant impact on water resources.
- Greenhouse Gas (GHG) Emissions To comply with this rule revision, only minor modifications to existing industrial facilities will be required. Therefore, no short-term construction impacts are expected from this rule revision. Energy increase expected from this rule revision for operations is estimated to be 0.09% increase in the non-residential sector. The impact to energy is determined to be not significant. This increase in energy consumption could potentially contribute to an increase in GHGs produced. The potential GHG increase from the increase in energy consumption from the rule revision is estimated to be 4,907 metric tons of CO2e per year. Another potential source of GHG emissions would come from off-road trucks used to water dirt roads at existing landfills. The District estimates 59.2 metric tons of CO2e per year from this activity. The District does not have an established GHG threshold of significance. However, the District compared this increase to the level of significance threshold for stationary sources from the Bay Area Air Quality Management District and South Coast Air Quality Management District which have a significance threshold of 10,000 metric tons of CO2e per year. Therefore, this impact is not significant for greenhouse gas emissions.

7. Evaluation of Reasonably Foreseeable Mitigation Measures:

Because no significant environmental impacts have been identified, no mitigation is proposed and would be speculative. However, when affected facilities choose to install control equipment or make an operational change subject to a revised District permit, any potential environmental impacts will be evaluated at that time and mitigation can be imposed if significant environmental impacts are determined to be caused by compliance.

8. Evaluation of Reasonably Foreseeable Alternative Means of Compliance:

Because no significant environmental impacts have been identified, no alternative methods to avoid or eliminate impacts from compliance are proposed and would be speculative. However, compliance can be achieved in some instances without installing new controls by reducing operational throughput and or hours of operation or relocating operations.

9. Other Public Agencies Whose Approval is Required:

None

10. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

No, California Native American tribes have not requested consultation for this project.

EVALUATION OF ENVIRONMENTAL IMPACTS

- 1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as wellas operational impacts.
- 3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
- 5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analyses Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to apreviously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

Issues	Potentially Significant Impact	Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Sec	tion 21099, would	the project:		
a) Have a substantial adverse effect on a scenic vista?				Х
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				x
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

Less Than

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		Significant		
	Potentially	With	Less Than	
	Significant	Mitigation	Significant	No
Issues	Impact	Incorporated	Impact	Impact

II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In

Less Than

	to information compiled by the California Department of Forestry including the Forest and Range Assessment Project and the Foremethodology provided in Forest Protocols adopted by the California	and Fire Protections est Legacy Asses	on regarding the stat sment <u>project;</u> and fo	e's inventory of orest carbon me	forest land
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?				х
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				х
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	П		П	х
e)	Involve other changes in the existing environment which, due				
	to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

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Significant Potentially With Less Than No Significant Mitigation Significant Issues Impact Incorporated Impact Impact III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project: a) Conflict with or obstruct implementation of the applicable air X quality plan? b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? c) Expose sensitive receptors to substantial pollutant concentrations? d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? Χ The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The types of facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. It is not known which actions each facility affected by this rule will take to comply. Some potential types of control equipment which may be used to comply with the rule are baghouses, carbon absorption, oxidation catalysts, diesel particulate filters, thermal oxidizers, wet gas scrubbers and electrostatic precipitators. Some alternative types of activities which may be employed to comply with the rule are paving dirt roads, watering dirt roads/piles, reducing operational throughput and or hours of operation and other minor changes to facilities or operations. Table 1 below shows estimated emissions from paving approximately five miles of dirt roads at three local landfills which may be affected by this rule revision. San Diego County screening levels of significance were used for comparison. Based on the comparison, paving dirt roads at three local landfills will not cause significant emissions. Table 2 below shows estimated emissions from off-road trucks while watering dirt roads at three local landfills which may be affected by this rule revision. San Diego County screening levels of significance were used for comparison. Based on the comparison, watering dirt roads at three local landfills will not cause significant emissions. The potential actions that facilities may take to comply with the rule will reduce the emissions of air pollutants and associated estimated cancer risks, and as such will not conflict or obstruct with the implementation of an air quality plan; result in a cumulatively considerable net increase in any criteria pollutant; expose sensitive receptors to substantial pollutant concentrations; or result in other emissions adversely affecting a substantial number of people. Since this rule will establish a more health protective limit for the cancer risk reduction

Less Than

threshold, the project will improve air quality in the issues analyzed.

Table 1 – Estimated Emissions from Construction Activities Related to Paving Dirt Roads at Three Landfills

Pollutant	NOx	СО	VOC	PM10	SOx
Total Estimated Paving Emissions (Lbs.)	75	65	13	4	0
Screening Level Threshold of Significance (Lbs. Per Day)	250	550	75	100	250
Above Threshold?	No	No	No	No	No

Table 2 – Estimated Emissions from Off-Road Trucks While Watering Dirt Roads at Three Landfills

Pollutant	NOx	СО	VOC	PM10	SOx
Estimated Operational Emissions (Tons Per Year)	0.16	0.13	0.03	0.01	0.001
Screening Level Threshold of Significance (Tons Per Year)	40	100	13.7	15	40
Above Threshold?	No	No	No	No	No

Potentially Significant Impact Less Than
Significant
With
Mitigation
Incorporated

Less Than Significant Impact

No Impact

IV.	BIOLOGICAL RESOURCES. Would the project:		
a)	<u>Have</u> a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		х
b)	<u>Have</u> a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		
c)	<u>Have</u> a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?		
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?		

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	Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
V. (CULTURAL RESOURCES. Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				x
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?				X
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?				X

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10	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI.	ENERGY. Would the project:				
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

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	Issues	Potentially Significant Impact	Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
VII	. GEOLOGY AND SOILS. Would the project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to				х
	Division of Mines and Geology Special Publication 42. ii) Strong seismic ground shaking?				
	iii) Seismic-related ground failure, including liquefaction?				
b)	iv) Landslides? Result in substantial soil erosion or the loss of topsoil?				х
c)	Be located on a geologic unit or soil that is unstable, or that				
	would become unstable <u>as a result of</u> the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				X
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e) l	Have soils incapable of adequately supporting the use of septic tanks or alternative <u>waste water</u> disposal systems where sewers are not available for the disposal of waste				
f)	water? Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				

Less Than

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	Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII	. GREENHOUSE GAS EMISSIONS. Would the project:				
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			x	
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				x

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	Issues	Potentially Significant Impact	Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
IX.	HAZARDS AND HAZARDOUS MATERIALS. Would the pro	ject:			
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				X
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				x
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				х
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				х
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				x
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				x

Less Than

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The types of existing facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. Depending on the facility process and control device used, small amounts of hazardous waste may be created such as contaminants from baghouses and diesel particulate filters. However, the project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, create a significant hazard to the public due to an accident or upset condition, or create hazardous emissions, materials, substances, or waste within one-quarter mile of a school. The project will not affect a facility located on a site included on the list of hazardous materials sites compiled pursuant to Government Code Section 56962.5 and as a result would not create a significant hazard to the public or the environment. The project will not affect the safety of people residing or working within an airport land use plan or within two miles of a public airport; therefore, no impact is expected. The project will not impair or interfere with adopted emergency response plans or emergency evacuation plans. The project will not increase exposure of people or structures to risk of loss, injury, or death due to wildland fires. Based on the above discussion, it is expected that project implementation would have no adverse impact on hazards or hazardous materials.

		Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
X	(. H	YDROLOGY AND WATER QUALITY. Would the project:				
а	•	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				x
b		Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				х
c		Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				х
	i)	result in a substantial erosion or siltation on- or off-site;				х
	ii)	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;				x
	iii)	create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				х
	iv)	,				х
d)		flood hazard, tsunami, or seiche zones, risk release of llutants due to project inundation?				х
e)		onflict with or obstruct implementation of a water quality ntrol plan or sustainable groundwater management plan?				х

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The types of existing facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. These types of facilities currently have permits with the District, but it is not known which actions each facility affected by this rule will take to comply. Some potential types of control equipment which may be used to comply with the rule are baghouses, carbon absorption, oxidation catalysts, diesel particulate filters, thermal oxidizers, wet gas scrubbers and electrostatic precipitators. Some alternative types of activities which may be taken to comply with the rule are paving dirt roads, watering dirt roads/piles, reducing operational throughput and or hours of operation and other minor changes to existing facilities or operations. To comply with the rule there may be a potential for increased watering at landfills and mineral processing facilities; however, the amount of water used to achieve this is not anticipated to cause a significant impact from water runoff. Project implementation would not violate any water quality standards or waste discharge requirements; would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge; would not substantially alter the existing drainage pattern of the site or area; would not create or contribute runoff water which would exceed the capacity for existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; would not otherwise substantially degrade water quality; would not place housing within a 100year flood hazard area; would not place structures which would impede or redirect flood flows within a 100-year flood hazard area; and would not expose people or structures to a significant risk of loss, injury, death, inundation by seiche, tsunami, or mudflow. Therefore, no impact to hydrology or water quality is expected.

	Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	LAND USE AND PLANNING. Would the project:				
a)	Physically divide an established community?				x
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				x

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The proposed rule amendments would apply to existing 26 industrial facilities in San Diego County. Project implementation would not physically divide an established community; would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect; and would not conflict with any applicable habitat conservation or natural community conservation plan. Based on the above discussion, it is expected that project implementation would have no adverse impact on land use/planning.

YII	Issues MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				х
b)	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific <u>plan</u> or other land use plan?				x

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The types of existing facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. These types of facilities currently have permits with the District, but it is not known which actions each facility will take to comply. The potential actions they take include installing control devices or modifying their operations. The list of potential control devices that may be installed are baghouses, carbon adsorption and oxidation catalysts, enclosures with HEPA filters or diesel particulate filters or diesel oxidation catalysts. Adding these types of control devices will require a modification of their District permit to operate. A facility may also choose to modify their operation by paving haul roads, using soil stabilizers, increased watering of haul roads or by limiting their hours of operation. None of the existing 26 facilities are located on a known mineral resource. Project implementation would not result in the loss of availability of a locally important mineral resource recovery site. Based on the above discussion, it is expected that project implementation would have no adverse impact on mineral resources.

	Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII	. NOISE. Would the project result <u>in:</u>				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				х
b)	Generation of excessive groundborne vibration or groundborne noise levels?				x
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people <u>residing</u> or working in the project area to excessive noise levels?				х

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The types of existing facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. These types of facilities currently have permits with the District, but it is not known which actions each facility affected by this rule will take to comply. Some potential types of control equipment which may be used to comply with the rule are baghouses, carbon absorption, oxidation catalysts, diesel particulate filters, thermal oxidizers, wet gas scrubbers and electrostatic precipitators. Some alternative types of activities which may be taken to comply with the rule are paving dirt roads, watering dirt roads/piles, reducing operational throughput and or hours of operation and other minor changes to existing facilities or operations. The proposed rule amendments would apply to 26 existing industrial facilities in San Diego County, and potential control options would not be expected to result in additional noise from the facilities over current ambient noise levels. Project implementation would not result in exposure of persons to or generation of noise levels in excess of applicable standards; would not expose people to or generate excessive ground-borne vibration or noise; would not result in a substantial permanent, temporary, or periodic increase in ambient noise levels; and would not affect any airport land use plan or private air strip. Based on this discussion it is expected that project implementation would have a less than significant noise impact.

	Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV	. POPULATION AND HOUSING. Would the project:				
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				х
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				х

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The proposed rule amendments apply to 26 existing industrial facilities in San Diego County. Project implementation would not induce substantial growth and would not displace substantial numbers of housing or people, requiring the construction of replacement housing. Based on the above discussion, it is expected that project implementation would have no adverse impact on population/housing.

Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. PUBLIC SERVICES. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?				X
Police protection?				х
Schools?				х
Parks?				х
Other public facilities?				х

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The proposed rule amendments apply to 26 existing industrial facilities in San Diego County. There will be no physical impacts to governmental facilities, and no new or altered governmental facilities would be required to maintain acceptable service ratios, response times or other performance objectives for public services. Based on the above discussion, it is expected that project implementation would have no adverse impact on public services.

	Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
XV	I. RECREATION.				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				х
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				x

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The proposed rule amendments apply to 26 existing industrial facilities in San Diego County. Project implementation would not result in increased use of any existing neighborhood park, regional park or recreation facility. The project does not include recreational facilities, nor does it require construction or expansion of existing facilities. Therefore, it is expected that the project would have no adverse impact on recreational facilities.

	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI	I. TRANSPORTATION. Would the project:				
a)	Conflict with a program, plan, <u>ordinance</u> or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				х
b)	Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?				X
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				x
d)	Result in inadequate emergency access?				x

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The types of existing facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. These types of facilities currently have permits with the District, but it is not known which actions each facility affected by this rule will take to comply. Some potential types of control equipment which may be used to comply with the rule are baghouses, carbon absorption, oxidation catalysts, diesel particulate filters, thermal oxidizers, wet gas scrubbers and electrostatic precipitators. Some alternative types of activities which may be taken to comply with the rule are paving dirt roads, watering dirt roads/piles, reducing operational throughput and or hours of operation and other minor changes to existing facilities or operations. Project implementation would not cause a substantial increase in traffic or vehicle miles traveled in relation to the existing traffic load and capacity of the street system; would not exceed, either individually or cumulatively, a level of service standard established by the regional congestion management agency for any road or highway; would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; would not substantially increase hazards due to a design feature or incompatible uses; would not result in inadequate emergency access or parking capacity; and would not conflict with adopted policies, plans, or programs supporting alternative transportation. Based on the above discussion, it is expected that project implementation would have no impact on transportation or vehicle miles traveled.

		Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII	. TR	RIBAL CULTURAL RESOURCES.				
	sign Res cultu the s	uld the project cause a substantial adverse change in the ificance of a tribal cultural resource, defined in Public ources Code § 21074 as either a site, feature, place, ural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object cultural value to a California Native American tribe, and is:				x
i	i)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or				x
	ii)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				х

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The types of existing facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. These types of facilities currently have permits with the District, but it is not known which actions each facility affected by this rule will take to comply. Some potential types of control equipment which may be used to comply with the rule are baghouses, carbon absorption, oxidation catalysts, diesel particulate filters, thermal oxidizers, wet gas scrubbers and electrostatic precipitators. Some alternative types of activities which may be taken to comply with the rule are paving dirt roads, watering dirt roads/piles, reducing operational throughput and or hours of operation and other minor changes to existing facilities or operations. The project will not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. Based on the above discussion, it is expected that project implementation would have no impact on tribal cultural resources.

	Issues	Potentially Significant Impact	Less Than Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX	. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				х
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				х
c)	Result in a determination by the <u>waste water</u> treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				х
d)	Generate solid waste <u>in excess of</u> state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				x
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The types of existing facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. These types of facilities currently have permits with the District, but it is not known which actions each facility affected by this rule will take to comply. Some potential types of control equipment which may be used to comply with the rule are baghouses, carbon absorption, oxidation catalysts, diesel particulate filters, thermal oxidizers, wet gas scrubbers and electrostatic precipitators. Some alternative types of activities which may be taken to comply with the rule are paving dirt roads, watering dirt roads/piles, reducing operational throughput and or hours of operation and other minor changes to existing facilities or operations. To comply with the rule there may be a potential for increased watering at landfills and mineral processing facilities; however, the amount of water used is not anticipated to cause a significant impact for stormwater drainage. Implementation of the project will not cause changes to the existing wastewater facilities. Project implementation would not exceed wastewater treatment requirements of the regional water quality control board; would not require or result in the construction of new water, wastewater treatment, or storm water drainage facilities, or the expansion of existing facilities; would not require water supplies in excess of existing entitlements and resources or require new or expanded entitlements; would not require additional wastewater treatment capacity or landfill capacity; and would comply with federal, State, and local statutes and regulations related to solid waste. Based on the above discussion, it is expected that project implementation would have no adverse impact on utilities/service systems.

	Issues	Potentially Significant Impact	Significant <u>With</u> Mitigation Incorporated	Less Than Significant Impact	No Impact
XX.	WILDFIRE. If located in or near state responsibility areas or project:	lands classified	as very high fire	hazard severity zor	nes, would the
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?				x
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				х
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				х
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, <u>as a result of</u> runoff, post-fire slope instability, or drainage changes?				x

Less Than

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The proposed rule amendments apply to 26 existing industrial facilities in San Diego County. Project implementation will not impair an adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risks; require the installation of associated infrastructure that may exacerbate fire risk; or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Based on the above discussion, it is expected that project implementation would have no adverse impact on wildfire.

	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX	(I. MANDATORY FINDINGS OF SIGNIFICANCE.				
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the <u>number</u> or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				X
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)				х
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				х

Loce Than

The proposed project consists of revising an air pollution control rule which will decrease the cancer risk reduction threshold from 100 in one million to 10 in one million to establish a more health protective limit. The proposed rule amendments apply to 26 existing industrial facilities in San Diego County. The types of existing facilities in San Diego County which may be affected by the amended rule are mineral processing, shipbuilding, landfills, sewage treatment, turbine repair and testing, hospitals, power plants and a university and scientific research facility. Some potential types of control equipment which may be used to comply with the rule are baghouses, carbon absorption, oxidation catalysts, diesel particulate filters, thermal oxidizers, wet gas scrubbers and electrostatic precipitators. Also, some alternative types of activities may be employed to comply with the rule are paying dirt roads, watering dirt roads/piles, reducing operational throughput and or hours of operation and other minor changes to facilities or operations. When affected facilities choose to install control equipment or make an operational change subject to a revised District permit, any potential environmental impacts will be evaluated at that time. Based on the analysis in this document, the Air Pollution Control District finds that this project does not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The project does not have cumulatively considerable impacts nor have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly.