



## 2022 EIR Addendum

### FOR PURPOSES OF CONSIDERATION OF THE PROPOSED 2022 REGIONAL AIR QUALITY STRATEGY (RAQS) REVISION FOR SAN DIEGO COUNTY

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January 10, 2023

#### **Environmental Review Update Checklist Form For Projects with Previously Approved Environmental Documents**

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted Negative Declaration (ND) or a previously certified environmental impact report (EIR) covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15164(e) to explain the rationale for determining whether any additional environmental documentation is needed for the subject discretionary action.

#### **1. Background on the previously certified EIR:**

- A programmatic Environmental Impact Report (EIR) for the 1991 San Diego County Regional Air Quality Strategy (RAQS) was certified by the County of San Diego Air Pollution Control Board (Board) on June 30, 1992. The certified programmatic EIR analyzed the potential environmental impacts of the various control technologies for implementing the control measures in the 1991 RAQS and found that any potential adverse environmental impacts would be mitigated below a level of significance.
- A Supplemental EIR addressing the 1998 RAQS Revision and supplementing the Final EIR for the 1991 RAQS was certified by the Board on June 17, 1998. This Supplemental EIR found that the 1998 changes to the RAQS were not substantial and would not result in new or more severe significant environmental impacts.
- An Addendum to the previously certified Final Environmental Impact Report for the 1991 San Diego County Regional Air Quality Strategy was approved by the Board on August 8, 2001. This addendum found that the 2001 RAQS Revision would not require major revisions to the previous EIR, result in any new significant adverse impacts, make previously identified significant adverse impacts more severe, or require new mitigation measures or alternatives.
- A Negative Declaration addressing the 2004 RAQS Revision was adopted by the Board on July 28, 2004. The Negative Declaration was based on a finding of no substantial evidence that the 2004 RAQS Revision would have a significant adverse effect on the environment.
- An Addendum to the previously certified Final Environmental Impact Report for the 1991 San Diego County Regional Air Quality Strategy was approved by the Board on April 22,

2009. This addendum found that the 2009 RAQS Revision would not require major revisions to the previous EIR, result in any new significant adverse impacts, make previously identified significant adverse impacts more severe, or require new mitigation measures or alternatives.

- An Addendum to the previously certified Final Environmental Impact Report for the 1991 San Diego County Regional Air Quality Strategy was approved by the Board on December 14, 2016. This addendum found that the 2016 RAQS Revision would not require major revisions to the previous EIR, result in any new significant adverse impacts, make previously identified significant adverse impacts more severe, or require new mitigation measures or alternatives.

**2. Lead agency name and address:**

San Diego County Air Pollution Control District  
10124 Old Grove Road  
San Diego, California 92131

**3. a. Lead agency contact:**

Eric Luther  
Air Quality Specialist  
(858) 586-2806  
E-mail: eric.luther@sdapcd.org

**b. Project applicant's name and address:**

San Diego County Air Pollution Control District  
10124 Old Grove Road  
San Diego, California 92131

**4. Summary of the project:**

San Diego County is a nonattainment area for California ambient air quality standards for ozone. Pursuant to the California Clean Air Act, air districts in nonattainment areas are required to prepare and implement air quality strategies identifying all feasible emission control measures to locally attain state ozone standards by the earliest practicable date. Accordingly, the Regional Air Quality Strategy (RAQS) for San Diego County was developed and adopted in 1992, identifying all feasible control measures to reduce emissions of ozone precursors (oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOC)) from stationary emission sources under the authority of the San Diego County Air Pollution Control District (District).

The California Clean Air Act also requires periodic RAQS revisions identifying the status of scheduled control measures and incorporating any new control measures determined feasible. Such evaluations are based on updated information regarding technology availability, emission

reduction potential, and cost-effectiveness. Accordingly, the RAQS was revised in 1995, 1998, 2001, 2004, 2009 and 2016.

The proposed 2022 RAQS Revision ensures continued compliance with the all-feasible-measures requirement. It also provides more ozone precursor emission reductions and reflects the District's tentative schedule of future regulatory activity. These possible control measures will be evaluated and, if warranted, developed into proposed rules for Board consideration in future years. Discussion of future project elements are included below.

**Measures scheduled for review and possible adoption as rules**

Measures scheduled for review and possible adoption as rules between 2023-2026		
Pollutant	Control Measure	Action
VOC	Control of Emissions from Restaurant Cooking Operations	New Rule
VOC	Control of Emissions from Large Poultry Operations	New Rule
VOC	Further Control of Marine Coatings	Amendments to Rule 67.18
NOx	Further Control of Natural Gas-Fired Fan-Type Central Furnaces	Amendments to Rule 69.6
NOx	Further Control of Stationary Gas Turbine Engines (SSM Provisions)	Amendments to Rule 69.3.1
NOx	Further Control of New/Replacement Stationary Reciprocating Internal Combustion Engines (SSM Provisions)	Amendments to Rule 69.4.1
NOx / PM	Indirect Source Rule	New Rule
NOx	Control of Emissions from Landfill Flares	New Rule

*A. Control of Emissions from Restaurant Cooking Operations*

Restaurants typically cook meat using one of two types of commercial charbroilers: chain-driven and under-fired. As food cooks on either type of device, fat drippings burn on the heating elements, creating flame and smoke. The resulting smoke and vapors are primarily composed of particulate matter (i.e. PM) and water, but also include measurable amounts of VOC. Absent a secondary emission control device on the charbroiling unit, such VOC is typically exhausted into the atmosphere and surrounding communities.

Several air districts in California have regulated commercial charbroilers since 2002 and today emission control devices are readily available that can achieve at least 83% reductions in VOC and PM. San Diego County could reduce VOC emissions from such devices if similar measures were locally adopted.

The District would need to evaluate the current costs of control devices and the number of restaurant cooking operations affected by such a measure because cost-effectiveness of

VOC controls varies. In total, commercial charbroiling is currently estimated to emit about 168 tons of VOC per year (0.4 tons per day) in San Diego County, a number that is projected to steadily rise through 2035. Consequently, the District has scheduled further evaluation of the proposed measure, and if warranted, will consider adoption of a new rule in a subsequent RAQS revision. As part of the evaluation, the District will also evaluate whether any potential measure may also apply to microenterprise home kitchen operations; a new category of retail food operations adopted in State law in 2018 (AB626, E. Garcia).

*B. Control of Emissions from Large Poultry Operations*

Changes made to the California Health and Safety Code in 2004 now require agricultural sources in California to obtain air quality permits through local air districts if they exceed certain federal emission thresholds for air contaminants. The District will assess over the next three years whether a local rule is necessary, as the requirement may now apply to one facility in San Diego County. As a result, the District has scheduled further evaluation of the proposed measure, and if warranted, will consider adoption of a new rule in a subsequent RAQS revision. If further evaluation shows emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

*C. Further Control of Marine Coatings*

District Rule 67.18 (Marine Coating Operations) sets VOC limits for primers, coatings, topcoats, and sealers used in the coating of marine and freshwater vessels, oil drilling platforms, navigational aids, and structures intended for exposure to a marine environment. The rule was last amended on May 15, 1996.

As part of the 2021 Portside Community Emissions Reduction Plan, the District committed to re-evaluating this rule for potential emission reductions, given most of the marine coating activity occurs in a state-designated disadvantaged community. Additional evaluation has been conducted to ensure existing VOC content limits, control efficiency, and transfer efficiency aligned with other air districts in California, as well as to align to federal Control Technique Guidelines for Miscellaneous Metal and Plastic Parts Coatings. The District will continue to evaluate adoption of the proposed measure and, if warranted, will schedule consideration of the proposed measure with the District Governing Board during the next three years. If further evaluation shows emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

*D. Further Control of Natural Gas-Fired Fan-Type Central Furnaces*

The District adopted Rule 69.6 (Natural Gas-Fired Fan-Type Central Furnaces) on June 17, 1998, establishing NOx emission limits of 40 ng/J for new residential furnaces. In recent years, many units have been certified to now meet a 14 ng/J limit. It is anticipated by the end of 2023 all categories of furnaces will be compliant with the 14 ng/J limit.

Given the proliferation of reduced NOx units since that time, the District now anticipates a proposed amendment to Rule 69.6 to incorporate the 14 ng/J limit could now be cost-

effective to achieve. Anticipated NO<sub>x</sub> emission reductions from the proposed measure would also assist the region in attaining both national and state ozone standards as expeditiously as practicable. Preliminary estimates for annual emission reductions in San Diego County, if similar controls are found to be feasible and cost-effective, are approximately 53 tons per year (0.14 tons per day), about a 65% reduction in NO<sub>x</sub> emissions from these units. Full implementation would be expected 25 years after rule adoption, considering an existing unit's useful life of 25 years. As such, the District will evaluate adoption of the proposed measure and, if warranted, will schedule consideration of the proposed measure with the District Governing Board during the next three years. An evaluation of any environmental impacts will be conducted at the time of the Rule revision.

E. *Further Control of Stationary Reciprocating Internal Combustion Engines*

Existing District Rule 69.4.1 regulates NO<sub>x</sub> emissions from stationary reciprocating internal combustion engines. Rule 69.4.1 applies to both gas and liquid-fueled stationary reciprocating internal combustion engines. The District amended Rule 69.4.1 in July 2020 to establish more stringent emission limits and incorporate other federal requirements as needed.

On September 30, 2021, a memorandum was signed by the EPA Assistant Administrator affecting startup, shutdown, and malfunction (SSM) requirements for stationary gas turbines and stationary reciprocating internal combustion engines. The memorandum announced the return of EPA's previous 2015 policy explaining that rule provisions that provide exemptions from air pollutant emissions limits during periods of SSM are not consistent with the federal Clean Air Act, and such provisions would generally not be approvable for inclusion in State Implementation Plans (SIPs). To date, the EPA has yet to formally request that the District update Rule 69.4.1 to align with the requirements of the recently reinstated 2015 SSM policy. However, in anticipation of such a request and pursuant to future EPA guidance expected in the future, the District will evaluate the potential impacts of this recent policy revision. If requested by EPA and if it is determined that the rule's exemptions for periods of SSM are now inconsistent with the recently reinstated 2015 policy, the District will evaluate adoption of a proposed amendment to Rule 69.4.1 and, if warranted, will schedule consideration of the proposed measure with the District Governing Board during the next three years. An evaluation of any environmental impacts will be conducted at the time of the Rule revision.

F. *Indirect Sources*

The District is currently engaging with stakeholders in consideration of a possible future Indirect Source Rule (ISR) that may apply to ports, warehouses, and distribution centers in San Diego County. Such a rule would seek to reduce nitrogen oxides and particulate matter from trucks and other vehicles traveling to and from these locations by regulating owners and operators of such facilities. Regulatory requirements may include less polluting or zero emission truck trips or modifications to facilities to reduce energy or natural gas usage. Possible emission reductions and cost-effectiveness from an ISR will be further evaluated during the rule development process. The District will evaluate adoption of a proposed ISR and, if warranted, will schedule consideration of the proposed measure with the District

Governing Board during the next three years. An evaluation of any environmental impacts will be conducted at the time of the Rule adoption.

G. *Control of Emissions from Landfill Flares*

Flaring is a high temperature oxidation process used to burn mostly hydrocarbons of waste gases from industrial or landfill operations. In San Diego County, flares at landfills and sewage treatment plants countywide combine to emit approximately 108 tons of NOx per year, but about two-thirds of those emissions emanate from four local landfill sources. Such landfill flares are not currently required to control NOx emissions through a District rule. Because the District does not have a rule, nor a NOx limit assigned to the affected flares, emission reductions have never been credited nor claimed by the District for the technology that may already be operational today. As such, the District’s Governing Board will be considering a proposed new landfill flare rule in early 2023 to fulfill federal requirements. An evaluation of any environmental impacts will be conducted at the time of the Rule adoption.

**Possible Further Study Measures for Evaluation**

Possible Further Study Measures to be evaluated between 2023-2026		
Pollutant	Control Measure	Action
VOC	Control of Emissions from Vacuum Truck Operations	New Rule
VOC	Further Control of Metal Parts and Products Coating Operations	Amendments to Rule 67.3
VOC	Further Control of Miscellaneous Surface Coating Operations and Other Processes Emitting Volatile Organic Compounds	Amendments to Rule 66.1
VOC	Further Control of Receiving and Storing Volatile Organic Compounds at Bulk Plants and Bulk Terminals	Amendments to Rule 61.1
VOC	Further Control of Aerospace Coatings	Amendments to Rule 67.9
VOC	Further Control of Adhesive Materials Application Operations	Amendments to Rule 67.21
VOC	Control of Emissions from Metalworking Fluids and Direct-Contact Lubricants	New Rule
VOC	Control of Emissions from Composting Operations (Non-Residential)	New Rule
VOC / PM	Further Control of Emissions from Wood-Burning Activities	New Rule
VOC / NOx	State Emission Offset Permitting Rule(s)	New Rule(s)
NOx	Control of Emissions from Miscellaneous NOx Sources	New Rule
NOx	Zero-Emission Central Furnaces	Amendments to Rule 69.6 (or New Rule)
NOx	Zero-Emission Residential Water Heaters	Amendments to Rule 69.5.1 (or New Rule)
NOx/VOC/PM/GHG	Alternative Approaches to Reducing Criteria Pollutants and GHGs within District’s Regulatory Authority	Various

A. *Control of Emissions from Vacuum Truck Operations*

A vacuum truck is an industrial vacuum on wheels used to collect materials, primarily liquids and semi-solids, and transfer them, typically to another part of an industrial facility. Vacuum trucks are widely used to remove trash from parking lots, clean out sewers and water mains for maintenance work, and remove waste from septic tanks and portable toilets. However, if the materials transferred contain petroleum, petroleum products, or other hydrocarbon liquids, vacuum truck operations have potential to release VOC into the ambient atmosphere. Emissions typically come from materials containing hydrocarbons contained in sludge, recovered oil, slop oil, crude oil, gasoline, petroleum distillates, feed stock, blending stock, water used to clean tanks and vessels, wastewater, and various mixtures and slurries.

To regulate vacuum trucks other air districts require facilities to use vacuum trucks equipped with on-board emission controls or couple emission control technology to an uncontrolled truck. Carbon adsorption systems (either on-board or portable) are the most typical emission control systems utilized. Though vacuum trucks are used in a wide variety of applications, the rules are only applicable to industries that transport volatile organic liquids, such as refineries, bulk plants, bulk terminals, marine terminals, and organic liquid pipeline facilities.

Preliminary estimates for annual emission reductions and cost-effectiveness in San Diego County are not currently known. Therefore, the District has scheduled further evaluation of the proposed measure, and if warranted, will consider adoption of a new rule in a subsequent RAQS revision. If further evaluation shows emission reductions would be significant the District may pursue the new Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

B. *Further Control of Metal Parts and Products Coating Operations*

District Rule 67.3 (Metal Parts and Products Coating Operations) controls VOC emissions for the source category by limiting the VOC content of paints and cleaning solvents, and specifies methods to minimize VOC emissions during equipment cleaning operations. VOC is emitted from the application and curing of metal part and product coatings, mainly from surface preparation materials and from cleaning of coating equipment. Rule 67.3 also requires the use of high-transfer efficiency application equipment.

One specialty coating limit found in Rule 67.3 (chemical agent resistant coatings, or CARC) has a VOC limit that exceeds federal Control Technique Guideline requirements. Rule 67.3 requires CARC to not exceed 420 grams of VOC per liter when air-dried, or 420 grams of VOC per liter when baked. Limits for CARC are not specified directly in applicable federal guidelines; thus, it can be construed that CARC limits already adhere to the “general” coating limit of 340 grams of VOC per liter (air-dried) or 280 grams of VOC per liter when baked. There is limited use of CARC in San Diego County that produces a

negligible impact to the overall miscellaneous metal and plastic part coating emission category, and even less of an impact to total countywide VOC emissions.

Nonetheless, the category limit could be reduced further. The emission reduction potential for lowering the VOC limit for CARC is about 0.003 tons of VOC per day. Therefore, the District has scheduled further evaluation of the proposed measure, and if warranted, it will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the revised Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

*C. Further Control of Miscellaneous Surface Coating Operations and Other Processes Emitting Volatile Organic Compounds*

Solvent cleaning and surface coating operations that are not covered by source-specific rules are regulated under Rule 66.1 (Miscellaneous Surface Coating Operations and Other Processes Emitting Volatile Organic Compounds), last amended on May 11, 2016. It has been historically used as a “catch-all” regulation for a variety of industrial operations, including but not limited to plastic, glass, and rubber coating operations. Consequently, the rule did not enumerate specific product category VOC limits, as is typically done with other District prohibitory rules. Instead, the facility is deemed to be in compliance with the regulation as long as it satisfies one of three criteria: (1) VOC emissions from such operations are less than five tons per calendar year (excluding emissions from cleaning operations); (2) VOC emissions are reduced by air pollution control equipment; or (3) surface coating operations are conducted using air dried coating with VOC content less than or equal to 420 grams per liter, or baked coating with VOC content less than or equal to 360 grams liter. While some facilities comply with the second and third options listed above, a number of facilities simply utilize less than five tons per year of surface coating/cleaning allowing them to use whatever product they desire.

Other air districts in California have taken a more prescriptive approach to achieve additional emission reductions by instead limiting emissions at the product category level. If this approach were adopted by the District in the future, it could result in additional VOC emission reductions on a per product category basis, though exact reduction and cost-effectiveness estimates are unknown. Consequently, the District has scheduled further evaluation of the proposed measure, and if warranted, it will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the revised Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

*D. Further Control of Receiving and Storing Volatile Organic Compounds at Bulk Plants and Bulk Terminals*

This source category is regulated by District Rule 61.1 (Receiving and Storing Volatile Organic Compounds at Bulk Plants and Bulk Terminals), which is applicable to large



storage tanks for gasoline and other high volatility motor vehicle fuels. The rule has not been amended since January 10, 1995.

Recent state law has placed renewed emphasis on reducing emissions in under-resourced communities that are especially burdened by air pollution. Two of the three facilities in San Diego County that are subject to Rule 61.1 are located within one of these communities, heightening the need for additional reductions (where feasible and cost-effective). While Rule 61.1 is currently in compliance with all state and federal regulations, the District plans to re-evaluate it once again not only for potential VOC emission reduction opportunities, but also to clarify and amend old or ambiguous language found within the rule itself. This includes further clarifying the control technology requirements for tank degassing operations, as well as clarifying the administrative process and timing of such operations during and outside peak ozone season (i.e. May through October).

An analysis is needed to determine if any additional control technology or operation modifications could be incorporated into the rule. Consequently, the District has scheduled further evaluation of the proposed measure, and if warranted, it will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the revised Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

E. *Further Control of Aerospace Coatings*

Existing Rule 67.9 already meets all federal requirements and most of the regulated product categories found in Rule 67.9 are as stringent as other air district rules, with some minor exceptions (adhesive bonding primers, antichafe coatings, dry lubricative materials (nonfastener), form release coatings, fuel tank coatings, paint strippers, and sealants). The District expects that if those product categories were updated, estimated VOC emission reductions would still be extremely low at less than two tons per year (0.005 tons per day). Nonetheless, the District has scheduled further evaluation of the proposed measure, and if warranted, it may be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the revised Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

F. *Further Control of Adhesive Materials Application Operations*

District Rule 67.21 (Adhesive Materials Application Operations) regulates VOC emissions from the use of adhesives and sealants. VOC limits found in Rule 67.21 are similar to other air districts with the exception of certain coating categories (certain flooring adhesives, plastic welding products, and various types of sealants).

The incorporation of more stringent VOC limits for the identified product categories is estimated to potentially reduce emissions by less than 36 tons per year (< 0.1 tons per day), if such limits were determined to be feasible, cost-effective, and adopted. As a result, the District has scheduled further evaluation of the proposed measure, and if warranted, it will

be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the revised Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

G. *Control of Emissions from Metalworking Fluids and Direct-Contact Lubricants*

Metalworking fluids are used to reduce heat and friction, as well as to remove metal particles during industrial machining and grinding operations. A variety of fluids are used during these processes, including vanishing oils, lubricants, and rust inhibitors. Operations that typically use such fluids include steel tube and spring manufacturers, aerospace manufacturers, and automobile parts manufacturers and rebuilders. Fluids and lubricants are also used frequently by machine shops for broaching, drilling, drawing, heading, honing, forging, milling, stamping, tapping, threading, and turning. Metalworking fluids and direct-contact lubricants contain VOC and are now regulated in two other air districts in California. The current extent of metalworking fluid and direct-contact lubricant use in San Diego County is unknown. Therefore, the District has scheduled further evaluation of the proposed measure, and if warranted, it will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

H. *Control of Emissions from Composting Operations (Non-Residential)*

The District does not specifically regulate emissions from composting operations. However, these operations emit VOC through decomposition of organic materials (such as green and wood waste, animal manure, and food waste) during chipping/grinding, stockpiling, and composting activities. Composting activities are expected to increase in the region in response to federal, state, and local mandates for waste diversion and waste reduction. Accordingly, the District continues to evaluate whether a measure to control VOC emissions from these sources is necessary or feasible. Other public agencies within California (including the California Department of Resources Recycling and Recovery and solid waste local enforcement agencies) are engaged in or have adopted regulations affecting composting activities to address other environmental objectives. State requirements in effect now require substantial diversion of organic waste from landfills, which enhances the need for facilities that can handle compost. Consequently, it is now unclear whether a District rule, that potentially would be duplicative to existing statewide/local regulations, would provide any quantitative benefit for the region and/or the facilities that might be subject to such a rule. As a result, the District will continue further evaluation of the proposed measure, and if warranted, it will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

I. *Further Control of Emissions from Wood-Burning Activities*

San Diego County currently has limited prohibitions in place to control outdoor residential open burning. However, the District does not have any controls in place to control residential indoor burning using wood burning devices, such as fireplaces and woodstoves. Wood burning devices are primarily a source of PM when material is burned. However, the combustion of wood also generates significant amounts of VOC, which is a precursor to ozone. Combined, woodstoves and fireplaces in San Diego County emit approximately 167 tons per year of VOC (0.45 tons per day), an amount that is expected to remain constant through 2050. Federal PM standards are anticipated to be lowered in the near future, which may necessitate the need for the District to explore additional opportunities for PM reduction. At the same time, the region must continue to strive to meet ozone standards at the state and federal level.

Other air districts in California have regulated wood burning activity by having point-of-sale requirements that a cleaner (or EPA-certified) device be installed in existing or new developments where a permanent indoor/outdoor wood burning device is installed. Examples include an EPA Phase II-certified fireplace insert, a pellet-fueled wood burning heater, masonry heaters, or dedicated gaseous-fueled devices. Such rules also prohibit burning of non-fuel sources (i.e. trash) in the device, and require commercial firewood establishments to only sell “seasoned” (i.e. low moisture content) firewood for most of the year.

Possible reductions that could be anticipated in San Diego County using a population-based ratio include VOC reductions of 0.08 tons/day, 0.01 tons/day of NOx, and 0.17 tons/day of PM2.5, if a measure were adopted in San Diego County. Consequently, the District will further evaluate the proposed measure, and if warranted, it will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

J. *State Emission Offset Permitting Rule(s)*

To demonstrate new sources of air pollution do not contribute to worsening air quality in the region the District has traditionally prepared a No-Net-Increase Demonstration analysis in each respective RAQS update to comply with State offset requirements. Historically, equipment shutdowns in San Diego County made a No Net Increase Demonstration feasible. However, in recent years there have been a steady decline in shutdowns; a trend that is expected to continue in future years. This could lead to the District being subject to more stringent state emission offsets requirements in the future and/or require the District to develop a State emission offset permitting rule. Emission offsets occur when a new or expanding business financially compensates another business that may possess validated emission reduction credits. Emission reduction credits are created by stationary sources that elect to install more stringent emission controls than required by regulation for existing equipment, or voluntarily ceasing operations (i.e. shutdowns). The 2022 RAQS includes further evaluation of a possible future state emission offset permitting measure, and if warranted, it will be scheduled for consideration/adoption. If further evaluation shows

emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

K. *Control of Miscellaneous NOx Sources*

The District already regulates emissions from a variety of large NOx sources, such as boilers, power plants, and stationary engines. However, a number of smaller gaseous and liquid-fueled combustion equipment used in various industrial, commercial, and institutional facilities, are not required to upgrade to the cleanest technology available. These include, but are not limited to, ovens, dryers, dehydrators, kilns, incinerators, asphalt plants, cookers, roasters, and fryers. Since 2005, other California air districts have adopted (and since amended) rules requiring the use of low-NOx burners. Other air districts vary in their approach to regulating these smaller sources. As part of its evaluation, the District will assess all methods of possible implementation and compliance demonstration and if warranted, a rule will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

L. *Zero-Emission Central Furnaces*

In the 2022 Draft State SIP Strategy, CARB proposed to develop a statewide rule in the 2025 timeframe to enact zero-emission standards for space heaters (i.e. central furnaces) and water heaters by 2030 using its regulatory authority for GHG reductions (as well as criteria pollutant benefits). As envisioned, CARB would not mandate retrofits in existing buildings in a certain timeframe. However, the proposed statewide rule could require 100% of new space heaters (i.e. central furnaces) and water heaters in new construction, and/or replacements in existing buildings, to meet a zero-emission standard in the future.

The possible incorporation of zero-emission standards for all new/existing fan-type central furnaces has the potential to reduce NOx emissions by at least 112 tons per year (0.3 tons per day) in San Diego County, if such limits were determined to be feasible, cost-effective, and adopted. As a result, the District has scheduled further evaluation of the proposed measure, and if warranted, it will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

M. *Zero-Emission Residential Water Heaters*

In the 2022 Draft State SIP Strategy, CARB proposed to develop a statewide rule in the 2025 timeframe to enact zero-emission standards for space heaters (i.e. central furnaces) and water heaters by 2030 using its regulatory authority for GHG reductions (as well as criteria pollutant benefits). As envisioned, CARB would not mandate retrofits in existing buildings in a certain timeframe. However, the proposed statewide rule could require 100% of new space heaters (i.e. central furnaces) and water heaters in new construction, and/or replacements in existing buildings, to meet a zero-emission standard in the future.

The possible incorporation of zero-emission standards for all new/existing water heaters has the potential to reduce NOx emissions by at least 149 tons per year (0.4 tons per day) in San Diego County, if such limits were determined to be feasible, cost-effective, and adopted. As a result, the District has scheduled further evaluation of the proposed measure, and if warranted, it will be scheduled for consideration/adoption in a subsequent RAQS Revision. If further evaluation shows emission reductions would be significant the District may pursue the Rule prior to the next RAQS at which point an evaluation of any environmental impacts will be conducted.

N. *Alternative Approaches to Reducing Criteria Pollutants and GHGs within District’s Regulatory Authority*

The District does not have the regulatory authority to regulate certain sectors (such as mobile sources) that could encourage additional reductions of GHGs. However, the District can nonetheless support and advocate for specific voluntary strategies that could achieve further criteria pollutant and/or GHG or PM reductions within our regulatory authority. Examples of such activities could include but are not limited to possible future rulemaking activities, enhanced education and outreach, the promotion of and providing additional incentive funding opportunities, enhanced legislative advocacy, enhanced CEQA review for local projects, the development (or promotion) of regionwide best management practices, and enhancing partnerships at the local, state, and federal levels. To ensure all opportunities are explored to the fullest extent and to align with recent Board direction, the District has scheduled evaluation of an ongoing further study measure that, if warranted, would schedule or consider such strategies (as applicable) either in a subsequent RAQS Revision or on an as-needed basis. District resources permitting, rule development (if applicable) may be pursued before then if resulting emission reductions would be significant at which point an evaluation of any environmental impacts will be conducted.

**5. DOES THE PROJECT FOR WHICH A SUBSEQUENT DISCRETIONARY ACTION IS NOW PROPOSED DIFFER IN ANY WAY FROM THE PREVIOUSLY APPROVED PROJECT?**

YES	NO
<input checked="" type="checkbox"/>	<input type="checkbox"/>

This discretionary action differs from the previously approved project because the project proposes to:

- Evaluate more stringent emissions limits using similar control technologies for the same control measures as analyzed in the previous programmatic EIR;
- Consider adoption of the revised control measures on an updated adoption schedule;
- Evaluate possible new control measures to control emissions from restaurant cooking operations, large poultry operations, indirect sources, vacuum truck operations, metalworking fluids and direct contact lubricants, composting operations, wood burning activities, State emissions offsets and miscellaneous NOx sources in a subsequent RAQS revision.

6. **SUBJECT AREAS DETERMINED TO HAVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS COMPARED TO THOSE IDENTIFIED IN THE PREVIOUS ND OR EIR.** The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

<input checked="" type="checkbox"/> NONE		
<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture & Forest Resources	<input type="checkbox"/> Air Quality
<input type="checkbox"/> Biological Resources	<input type="checkbox"/> Cultural Resources	<input type="checkbox"/> Geology/Soils
<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards & Haz. Materials	<input type="checkbox"/> Hydrology/Water Quality
<input type="checkbox"/> Land Use/Planning	<input type="checkbox"/> Mineral Resources	<input type="checkbox"/> Noise
<input type="checkbox"/> Population/Housing	<input type="checkbox"/> Public Services	<input type="checkbox"/> Recreation
<input type="checkbox"/> Transportation/Traffic	<input type="checkbox"/> Utilities/Service Systems	<input type="checkbox"/> Mandatory Findings of Significance
<input type="checkbox"/> Wildfire	<input type="checkbox"/> Energy	<input type="checkbox"/> Tribal Cultural Resources

**DETERMINATION:**

On the basis of this analysis, the San Diego County Air Pollution Control District has determined that:

<input checked="" type="checkbox"/>	No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously certified EIR is adequate upon completion of an ADDENDUM.
<input type="checkbox"/>	Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT ND is required.
<input type="checkbox"/>	Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous ND or EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

Eric Luther

Signature

1/10/23

Date

Eric Luther

Printed Name

Air Quality Specialist

Title

## INTRODUCTION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted ND or a previously certified EIR for the project.

CEQA Guidelines, Section 15162(a) and 15163 state that when an ND has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Negative Declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration; or
  - b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or
  - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines, Section 15164(a) states that an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred.



CEQA Guidelines, Section 15164(b) states that an Addendum to a previously adopted Negative Declaration may be prepared if only minor technical changes or additions are necessary.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted ND are necessary.

**The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.**

**ENVIRONMENTAL REVIEW UPDATE CHECKLIST**

**I. AESTHETICS** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No significant impacts to aesthetics were anticipated by the previous EIR. It was acknowledged that some emission control equipment can be architecturally unappealing, but it would typically be installed at existing industrial sites where visual impacts would be insignificant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**II. AGRICULTURE & FOREST RESOURCES** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use and/or conflicts with existing zoning for agricultural use or Williamson Act contract, result in the loss of forest land or conversion of forest land to non-forest use, conflict with existing zoning for, or cause rezoning of, forest land (as defined by 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)], or 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?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Potential impacts to agriculture and forestry resources from RAQS implementation were analyzed in the previous environmental document. No significant impacts to agricultural resources were identified. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**III. AIR QUALITY** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego County Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); violation of any air quality standard or substantial contribution to an existing or projected air quality violation; 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors); exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Net Ozone Air Quality Benefit** - The previous EIR identified no significant unmitigable impacts to air quality from adoption of the RAQS. In fact, it showed that air quality would improve with implementation of the RAQS. Air quality has continued to improve since the initial RAQS adoption. State one-hour ozone standard exceedances declined 97%, going from 134 in 1977, to just three in 2021. Pursuant to state law, a RAQS revision must be at least as effective in improving air quality as the previous RAQS version. Indeed, the proposed 2022 RAQS Revision provides considerable additional ozone precursor emission reductions, thereby satisfying this requirement.

Additional VOC and NOx control measures have been tentatively scheduled for further evaluation during the next three years for feasibility and rule adoption. The proposed RAQS Revision will provide additional emission reductions relative to the previous RAQS Revision, and therefore is more effective in improving regional air quality. Additionally, some VOC are toxic air contaminants and can cause odors. Therefore, additional VOC reductions contemplated in the proposed 2022 RAQS Revision could also result in reduced human exposure to toxic air contaminants and odors.

There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**IV. BIOLOGICAL RESOURCES** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service; adverse effects to federally protected wetlands as defined by Section 404 of the Clean Water Act; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat

Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No significant impacts to biological resources were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**V. CULTURAL RESOURCES** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; destroying a unique paleontological resource or site or unique geologic feature; and/or disturbing any human remains, including those interred outside of formal cemeteries?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No impacts to cultural resources were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**VI. ENERGY** - Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects towards wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No impacts to energy are expected from adoption of the potential new or amended control measures. The control measures would not create wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The control measures will also be consistent with State and local plans for renewable energy or energy efficiency as described earlier in the summary of the project. These measures will be analyzed individually for environmental impacts if and when they

are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**VII. GEOLOGY AND SOILS** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial risks to life or property; and/or having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No impacts to geology and soils were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**VIII. GREENHOUSE GAS (GHG) EMISSIONS** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or “new information of substantial importance” that result in one or more effects related to environmental effects associated with greenhouse gas emissions or compliance with applicable plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects. Implementation of the proposed 2022 RAQS Revision is likely to reduce GHG emissions and, therefore, will not locally contribute to climate change. The proposed future control measures to be evaluated during the next three years stand to reduce VOC and NOx emissions, which indirectly affect GHG pollutant levels. The proposed measures are not likely to increase GHG pollutants such as CO2, CH4, N2O, SF6, HFCs and PFCs and instead, many of these proposed measures will likely provide GHG emission reduction co-benefits.

No new impacts would be expected from adoption of the potential new or amended control measures. However, the control of emissions from composting operations and an indirect source rule has the

potential to affect future truck trips. A composting rule may increase truck trips by adding trips to a separate composting facility in addition to trips that already go to landfills. An indirect source rule may add trips if warehouse facilities decide to relocate to avoid areas the rule is applicable to. These measures and other actions discussed in the 2022 RAQS revision will be analyzed individually for environmental impacts if and when they are proposed for adoption.

**IX. HAZARDS AND HAZARDOUS MATERIALS** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of 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; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location 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; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No significant impacts to hazards and hazardous materials were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. If NOx or PM emission control systems cause any increase in hazardous materials, sources would be required to comply with existing regulations concerning handling and disposal of hazardous materials. Also, these measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**X. HYDROLOGY AND WATER QUALITY** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements; an increase in any listed pollutant to an impaired water body listed under section 303(d) of the Clean Water Act ; cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; provide substantial

additional sources of polluted runoff; place housing or other structures which would impede or redirect flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No significant impacts to hydrology and water quality were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**XI. LAND USE AND PLANNING** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; and/or conflicts with any applicable land use or habitat conversation plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No significant impacts to land use and planning were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**XII. MINERAL RESOURCES** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No impacts to mineral resources were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be

analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**XIII. NOISE** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise including: exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; for projects 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, or for projects within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

No significant impacts to noise were anticipated by the previous EIR. Compliance with existing noise ordinances will mitigate the potential impact of noise from emission control equipment to a level of less than significant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**XIV. POPULATION AND HOUSING** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including: inducing substantial population growth in an area, either directly or indirectly; or displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No significant impacts to population and housing were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.



**XV. PUBLIC SERVICES** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the 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 following public services: fire protection, police protection, schools, parks, or other public facilities?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

No significant impacts to public services were anticipated by the previous EIR. Possible impacts were identified for an unlikely accidental release of toxic substances from emission control systems. The previous EIR noted that any potential impacts to wastewater treatment and hazardous materials disposal are mitigated by the requirement that sources must comply with existing regulations governing such actions. Therefore, the potential impacts were considered less than significant. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**XVI. RECREATION** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in 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; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No significant impacts to recreation were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**XVII. TRANSPORTATION/TRAFFIC** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass

transit and non-motorized travel and relevant components of the circulation system (e.g. intersections, streets, highways and freeways, pedestrian and bicycle paths, mass transit, etc.); exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks; substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access; and/or a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No impacts to transportation/traffic were anticipated by the previous EIR. No new impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects. However, the control of emissions from composting operations and an indirect source rule has the potential to affect future truck trips. A composting rule may increase truck trips by adding trips to a separate composting facility in addition to trips that already go to landfills. An indirect source rule may add trips if warehouse facilities decide to relocate to avoid areas the rule is applicable to. These measures and other actions discussed in the 2022 RAQS revision will be analyzed individually for environmental impacts if and when they are proposed for adoption.

**XVIII. TRIBAL CULTURAL RESOURCES** - Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to 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? Also, is the tribal cultural resource 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)?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No new impacts to tribal cultural resources are anticipated from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption.

**XIX. UTILITIES AND SERVICE SYSTEMS** -- Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control

Board; require or result in the construction of new water or wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the project; result in a determination by the wastewater 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; be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No significant impacts to utilities and service systems were anticipated by the previous EIR. Impacts that may occur as a result of the adoption of the potential new or amended control measures include a potential increase in electric power needs and or natural gas consumption. Because of the uncertainty of how facilities will chose to comply with the new measures these measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**XX. WILDFIRE** - Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to wildfire including: substantially impair an adopted emergency response plan or emergency evacuation plan; 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; 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; expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

No new impacts to wildfire are expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE** – Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

- Does the project 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?
- 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)?
- Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The previous EIR did not identify any impacts which would necessitate mandatory findings of significance. This proposed 2022 RAQS Revision proposes the adoption of more stringent emissions limits to provide more ozone precursor emission reductions compared to previous RAQS revisions and reflects the District's tentative schedule of future regulatory activity. Thus, the proposed action will result in further enhancement of the quality of the environment, by further reducing air pollution in San Diego County. This will result in beneficial impacts to human health and the environment. No new adverse impacts would be expected from adoption of the potential new or amended control measures. These measures will be analyzed individually for environmental impacts if and when they are proposed for adoption. There are no changes in the project, changes in circumstance, or new information of substantial importance that involve significant new environmental effects or a substantial increase in the severity of previously identified environmental effects.