

Oral Comment 7 El Dorado County, Placerville CA, 95682

Response 7A: In meeting with El Dorado County representatives on September 6, 2005, in response to the comment letter submitted by Sue Lee of El Dorado County DOT, an additional issue was raised. El Dorado County requested clarification of the significance criteria used for the less-than-significant cumulative regional air quality impacts associated with ROG, NOX and CO (Impact #3.2-1, p. 3-26). Accordingly, for purposes of clarification, the Draft EIR is revised by inserting the following paragraphs after the first paragraph on p. 3-26:

The above conclusion that ROG and NOx impacts will be less-than-significant on a cumulative regional basis was reached in accordance with the methodology used in the AQMD CEQA Guide. The Guide (sec. 8.2.1) uses a four-part consistency test to determine the significance of cumulative impacts:

- 1) Does the project require a change in local land use designations?
- 2) Does the project exceed the “project alone” significance criteria?
- 3) Are all applicable mitigation measures being implemented?
- 4) Does the project comply with all applicable AQMD rules and regulations?

In this case, the RTP meets the first criterion because the traffic and air quality analyses employ the land use designations in the revised County General Plan that includes the possible construction of a proposed interchange on US 50 in Shingle Springs. The RTP also does not exceed the project alone significance criteria in the AQMD Guide, which is set at 82 lbs/day for both ROG and NOx. Because the estimated annual average emissions for the RTP in 2005, 2015 and 2025, as shown in Table 3.2-10, show a *reduction* in ROG and NOx emissions for all years analyzed, the ROG and NOx (ozone precursor) impacts of the RTP are clearly less than the project alone criteria. The RTP analysis also accounts for the relevant mitigation measures and does not violate any AQMD rules or regulations. The RTP will therefore have a less-than-significant impact on ROG and NOx emissions in the region. Because the AQMD significance criteria are based on the more stringent state ozone ambient air quality standard, this conclusion is valid with respect to the state ozone standard as well as the less stringent federal ozone ambient air quality standard.

The AQMD Guide also requires a federal conformity analysis to show that the project will not interfere with attainment of the federal ozone standard. This requirement will be met when the RTP projects are included in the forthcoming new MTIP and SACOG performs the required conformity analysis for the MTIP.

The AQMD Guide does not have separate cumulative impacts significance criteria for CO, and instead recommends a determination whether the project will cause or contribute to a violation of the state and federal CO ambient air quality standards. As the region is in attainment for CO, and the CO emissions estimates shown in Table 3.2-10 show a *reduction* in CO emissions, it follows that the RTP

will not cause or contribute to a violation of applicable CO standards, and the RTP will therefore have less-than-significant impacts for CO.

The draft EIR concludes that the PM10 emissions associated with the RTP will be “significant and unavoidable” (Impact #3.2-2, p. 3-26). Accordingly, for purposes of clarification, the Draft EIR is revised by inserting the following paragraph following the second paragraph on p. 3-26:

For planning projects (such as the RTP) with air emissions attributable primarily to regional motor vehicles, the AQMD Guide uses three criteria for determining the significance of cumulative impacts for PM10:

- 1) Is the project significant under the “project alone” criteria?
- 2) Does the project comply with AQMD rules and regulations?
- 3) Is the project also not cumulatively significant for emissions of ROG, NOx and CO?

The project meets these criteria with respect to the federal PM10 standard, as the region is in attainment with that standard. With regard to the state 24-hour PM10 standard, criteria 2) and 3) are met, but criterion 1) is not. The region has been designated nonattainment for the state 24-hour PM10 standard. In such a case, the “project alone” significance criterion for PM10 dictates that any increase in PM10 emissions should be designated as significant. Since Table 3.2-10 shows an increase in PM10 emissions over time, the RTP will therefore have significant impacts for PM10. As noted above, those impacts are unavoidable because the increase in PM10 emissions is attributable to tire and brake wear, for which there is no feasible mitigation measure.