SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Addendum to June 2000 Final Program Environmental Assessment for Proposed Fleet Vehicle Rules and Related Rule Amendments for:

Proposed Amended Rule 1186.1 – Less-Polluting Sweepers and Rule 1196 – Clean On-Road Heavy Duty Public Fleets

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INTRODUCTION

Between June 2000 and April 2001 the South Coast Air Quality Management District (SCAQMD) Governing Board adopted seven mobile source rules, commonly referred to as the "fleet rules." The purpose of the fleet rules is to reduce mobile source emissions by accelerating the implementation of currently available cleaner-burning or alternative-fuel vehicle technologies. Modification of two of the originally adopted and amended rules is being proposed, Rule 1186.1 – Less-Polluting Sweepers, and Rule 1196 – Clean On-Road Heavy-Duty Public Vehicles.

Rule 1186.1 affects street sweepers in public fleets with 15 or more on-road vehicles and private fleets that provide street sweeping services to affected public fleets. Beginning July 1, 2002, Rule 1186.1 required operators of these fleets to purchase alternative-fueled sweepers when adding or replacing street sweepers to their existing fleets.

Rule 1196 affects public fleets with 15 or more on-road heavy-duty vehicles. Beginning July 1, 2002, Rule 1196 required operators of affected fleets to purchase either alternative-fuel-, dual-fuel-, or dedicated gasoline-powered heavy-duty vehicles when adding or replacing heavy-duty vehicles.

Both Rules 1186.1 and 1196 include provisions that allow the purchase of diesel-powered vehicles in lieu of the above requirements if certain conditions are met by the fleet operator. These provisions originally expired on July 1, 2004, and June 30, 2004, respectively. In June 2004 these sunset dates were extended for one year due to the lack of natural-gas refueling infrastructure in certain areas of the SCAQMD's jurisdicational boundaries as well as the lack of alternative-fuel street sweepers for some specific applications.

Because of the continuing lack of natural-gas refueling infrastructure in more remote and outer areas within the SCAQMD's jurisdiction, as well as the lack of availability of alternative-fuel engines in street sweepers, the SCAQMD is currently proposing to further extend the sunset dates of July 1, 2005 to July 1, 2006 in Rule 1186.1 and June 30, 2005 to June 30, 2006 in Rule 1196.

An addendum is the appropriate California Environmental Quality Act (CEQA) document for the proposed project because the proposed modifications to the amended rules do not constitute a significant adverse change to these previously approved projects and the changes do not trigger any conditions identified in CEQA Guidelines §15162. Pursuant to CEQA Guidelines §15164(c), an addendum need not be circulated for public review. This Addendum, along with the previously prepared Final Program EA and the June 2004 Addendum, supporting documentation, and

record of project approval are available upon request by calling the SCAQMD Public Information Center at (909) 396-2309.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

The proposed amendments to Rules 1186.1 and 1196 are considered to be modifications to previously approved projects and are a "project" as defined by CEQA. CEQA requires that the potential adverse environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid identified significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, the SCAQMD, as the CEQA Lead Agency for this project, prepared a comprehensive Final Program EA for the following previously approved projects: Proposed Fleet Vehicle Rules and Related Rule Amendments (SCAQMD No. 000307DWS, June, 2000) and Addendum to the June 2000 Final Program EA for Proposed Fleet Vehicle Rules (SCAQMD No. 040512MK, May, 2004). The environmental impacts from the provision, which included the original sunset date of the provision, were evaluated in the Program EA and the environmental impacts from delaying the sunset dates were evaluated in the 2004 Addendum. The Draft PEA was released for a 45-day public review and comment period from March 10, 2000 to April 25, 2000 and the Addendum was not required to be circulated for public review pursuant to CEQA Guidelines §15164 (c).

This 2005 Addendum to the June 2000 Final Program EA has been prepared in accordance with CEQA Guidelines §15164, which states that an addendum shall be prepared unless any of the following conditions requiring preparation of a subsequent EA pursuant to CEQA Guidelines §15162 are anticipated:

- Substantial changes which will require major revisions of the previous CEQA documents due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- Substantial changes, with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous CEQA documents due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 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 CEQA documents were certified as complete, such as:

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♦ The project will have one or more significant effects not discussed in the previous CEQA documents;

- ♦ Significant effects previously examined will be substantially more severe than shown in the previous CEQA documents;
- ♦ Identification of mitigation measures or alternatives previously found not be feasible, but would in fact be feasible, and would substantially reduce one or more significant effects, but the project proponent declines to adopt the mitigation measures or alternatives; or
- ♦ Identification of mitigation measures or alternatives which are considerably different from those analyzed in the previous CEQA documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

An Addendum is the appropriate CEQA document because an extension of the sunset dates does not result in new or more severe significant effects requiring substantial revisions in the previous Program EA. A portion of the emission reductions anticipated from usage of alternative-fueled vehicles will be delayed but the proposed project will not result in a substantial increase in existing emissions since the TICR provision is currently allowed. In particular, no new significant project-specific or cumulative impacts in any environmental areas were identified, nor would any project-specific or cumulative impacts in any environmental areas be made substantially worse as a result of implementing the proposed project as explained in subsequent sections of this Addendum. This Addendum is not required to be circulated for public review but will be provided to the Governing Board at the September 9, 2005 Public Hearing. This Addendum and all other related CEQA documents are available to the public upon request by contacting the SCAQMD's Public Information Center at (909) 396-2039.

PROJECT LOCATION

The SCAQMD has jurisdiction over an area of approximately 10,743 square miles (referred to hereafter as the district), consisting of the four-county South Coast Air Basin (Basin) (Orange County and the non-desert portions of Los Angeles, Riverside and San Bernardino counties) and the Riverside County portions of the Salton Sea Air Basin (SSAB) and the Mojave Desert Air Basin (MDAB). The Basin, which is a subarea of the district, is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the nondesert portions of Los Angeles, Riverside, and San Bernardino counties. The Riverside County portions of the SSAB and MDAB are bounded by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley. The federal nonattainment area (known as the Coachella Valley Planning Area) is a subregion of Riverside County and the SSAB that is bounded by the San Jacinto Mountains to the west and the eastern boundary of the Coachella Valley to the east (Figure 1).



FIGURE 1

South Coast Air Quality Management District

RULES 1186.1 AND 1196 BACKGROUND

Rule 1186.1 was adopted by the SCAQMD Governing Board on August 18, 2000, and it regulates street sweepers in public fleets with 15 or more on-road vehicles and private fleets that provide street sweeping services to affected public fleets. A street sweeper is defined as an on-road vehicle weighing 14,000 pounds or more that is permitted to operate on public roads for the express purpose of removing material from paved surfaces by using mechanical systems through the action of one or more brooms, or by suction through a vacuum/regenerative air system, or any combination of these two systems. As of July 1, 2002, Rule 1186.1 required these fleets to purchase alternative-fueled sweepers when adding or replacing street sweepers to their existing fleets. This rule applies to any federal, state, county, city or governmental department or agency, any special district such as water, air, sanitation, transit, and school districts, or private individual firm, association, franchise, contractor, user or owner who provides sweeping services to a governmental agency

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that owns or leases 15 or more vehicles, including passenger cars, light-duty trucks, and medium- and heavy-duty on-road vehicles in the jurisdiction of the SCAQMD.

Under Rule 1186.1, in order to take advantage of the provision that allows the purchase of diesel-powered vehicles in lieu of alternative-fueled vehicle usage requirements, the affected fleet operator must submit a Technical Infeasibility Certification Request (TICR) with appropriate documentation for the SCAQMD to determine if the required conditions have been met. If a TICR is approved, the affected fleet operator is allowed to purchase the necessary number of diesel-powered vehicles within a specific timeframe. For Rule 1186.1, an affected fleet operator may obtain TICR approval if a demonstration is made that: (1) no alternative-fuel engine and chassis configuration is commercially available for sweeping operations conducted by the fleet operator, or (2) a fueling station for alternative-fuel sweepers is not available within five miles of the fleet operator's vehicle storage or maintenance yards. The current Rule 1186.1 TICR provision expires on July 1, 2005.

Rule 1196 was adopted by the SCAQMD Governing Board on October 20, 2000, and it regulates public fleets with 15 or more on-road heavy-duty vehicles. Heavy-duty vehicles are defined as on-road vehicles with a maximum loaded weight capacity of 14,000 pounds or greater, and typical vehicle applications affected by Rule 1196 include public works vehicles such as dump trucks, boom trucks, flatbed trucks, and water trucks. As of July 1, 2002, Rule 1196 required affected fleets to purchase either alternative-fuel-, dual-fuel-, or dedicated gasoline-powered heavy-duty vehicles when adding or replacing heavy-duty vehicles. The rule applies to all government agencies located in the district, including federal, state, regional, county and city departments and agencies, and any special districts such as water, air, sanitation, transit and school districts, with 15 or more heavy-duty vehicles. The purpose of both rules is to reduce both air toxic and criteria pollutant emissions.

The corresponding provisions for Rule 1196 specify that an affected fleet operator may obtain TICR approval if a demonstration is made that: (1) no alternative-fuel, gasoline, or dual-fuel engine and chassis configuration is commercially available from any manufacturer or could be used in a specific application, or (2) demonstration that an alternative-fuel refueling station for alternative-fueled or dual-fueled heavy-duty vehicles is not available within five miles of the vehicle storage or maintenance yards, or at locations where vehicles will be home-based for extended periods of time and the refueling supply is provided by mobile means, or (3) the purchase of compliant vehicles exceeds the incremental cost-effectiveness criteria established in accordance with the most recent requirements of the Carl Moyer Program or the Mobile Source Emission Reduction Review Committee Program, whichever is greater. The Rule 1196 TICR expiration date of June 30, 2005, only

applies to the TICR provision relating to lack of alternative fuel refueling stations within five miles of the vehicle storage or maintenance yards.

The number and location of publicly accessible alternative-fuel refueling stations is a critical element in implementing the TICR provisions in Rules 1186.1 and 1196. To date, six Rule 1186.1 TICRs for a total of six street sweepers have been submitted to the SCAQMD and approved based on the lack of alternative-fuel refueling stations within five miles of the vehicle's storage and maintenance yards. For Rule 1196, 29 TICRs for a total of 46 heavy-duty vehicles have been submitted to the SCAQMD and approved based on the the lack of alternative-fuel refueling stations within five miles of the vehicle's storage and maintenance yards.

PROPOSED AMENDMENTS

To address the lack of natural-gas refueling infrastructure in certain areas of the SCAQMD jurisdictional boundaries as well as the lack of alternative-fuel street sweepers for specific applications, the SCAQMD is proposing rule amendments that would extend the sunset date for the TICR provision from July 1, 2005, to July 1, 2006, in Rule 1186.1 subparagraph (d)(1)(B) and the sunset date of June 30, 2005, to June 30, 2006, in Rule 1196 subparagraph (d)(4). A one-year extension of these sunsets dates is appropriate given the potential number of alternative-fuel refueling stations that could be constructed in the district and the development and commercialization of new alternative street-sweeping models for specific applications that could address the specific street sweeping applications where Rule 1186.1 compliant street sweepers currently do not exist.

ANALYSIS OF ENVIRONMENTAL IMPACTS

Of the 17 environmental impact areas on the environmental checklist, only air quality was identified as being potentially adversely affected by the proposed project. The air quality impact identified is a delay in a portion of the emission reductions originally anticipated for Rules 1186.1 and 1196. The impact, however, is not significant, will not result in increased emissions or worsen current air quality, and will be temporary.

Air Quality - Delay of Emission Reductions for NOx and PM

Proposed amended Rules (PAR) 1186.1 and 1196 will result in a delay of emission reductions because affected operators taking advantage of the provision will not achieve the emission reductions expected if they converted to alternative-fueled sweepers and heavy-duty vehicles. Because the rules affect diesel fueled engines, the affected criteria pollutants are primarily nitrogen oxides (NOx) and particulate matter (PM). The emission impacts from carbon monoxide (CO) and hydrocarbons (HC) are

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negligible since diesel fuel combustion and natural gas combustion both generate small amounts of these pollutants.

In order to provide a "worst-case" scenario, as explained in the following subsections, conservative assumptions, such as the number of affected operators, are used to calculate the delay of emission reductions. Therefore, the estimated delay of emission reductions overestimates the actual delay of emission reductions. The proposed revisions to these rules consist of a one-year delay to the sunset date associated with the provision allowing TICR approval for the unavailability of refueling infrastructure.

Rule 1186.1 Air Quality Impact

The projected number of street sweepers that would have received TICR approval due to the one year delay in sunset date is based on number of street sweepers (six) that have already received or are pending TICR approval for lack of refueling infrastructure during the first three years of Rule 1186.1 implementation. Therefore, based on the historical record, approximately two street sweeper operators have applied for TICR approval per year, and since the provision is being delayed one additional year, then an estimated two additional operators will be affected by the proposed project. To provide a "worst-case" scenario for determining the emission reductions delayed and based on the past year's application record, it is assumed that a maximum of four street sweepers, double the number who currently take advantage of the provision annually, would be affected by this proposed rule amendment over the year the TICR provision is extended from July 1, 2005, to July 1, 2006. Further, for this particular project, doubling the projected number of vehicles expected to take advantage of the TICR provision is a reasonable assumption because of the increasing turnover of the aging fleets.

This doesn't account, however, for the fact that not all street sweepers are designed the same. Some street sweepers utilize a single engine and others are designed with dual engines. Single engine street sweepers utilize a propulsion engine while dual engines have a propulsion and auxiliary engine. Since it is not known whether the extended TICR will be applied to single engine or dual engine street sweepers, delayed emission reductions for both types of engines are calculated.

The emission rates vary depending upon the engine type. To accurately determine the delay of emission reductions, the propulsion engine emission rate used is the difference between the emissions from the affected street sweepers if complying with the emission rate of alternative-fueled street sweepers (1.5 g/bhp-hr for NOx and 0.01 g/bhp-hr for PM) and the emissions from street sweepers with TICR approval (2.5 g/bhp-hr for NOx and 0.1 g/bhp-hr for PM). Thus, the differential emission rate from

the propulsion engines is 1.0 g/bhp-hr for NOx (2.5 g/bhp-hr – 1.5 g/bhp-hr) and 0.09 g/bhp-hr for PM (0.1 g/bhp-hr – 0.01 g/bhp-hr).

The same holds true for the auxiliary engines. The difference between complying with the emission rate of auxiliary engines in alternative fueled street sweepers (1.4 g/bhp-hr for NOx and 0.03 g/bhp-hr for PM) and the emissions from the auxiliary engine with TICR approval (4.8 g/bhp-hr for NOx and 0.22 g/bhp-hr for PM) is 3.4 g/bhp-hr for NOx (4.8 g/bhp-hr – 1.4 g/bhp-hr) and 0.19 g/bhp-hr for PM (0.22 g/bhp-hr – 0.03 g/bhp-hr).

The emissions from the single engine and dual engine street sweepers are calculated first and the results of the calculations are presented in Table 1. Table 1 also accounts for the percent of each type of street sweeper based on their percentage in the total street sweeper population. Because the street sweeper population is 80 percent dual engines and 20 percent single engines (Rule 1186.1 Staff Report, SCAQMD, August 2000), the total affected number of street sweepers have been weighted to reflect the number of affected single engine street sweepers and the number of affected dual engine street sweepers to determine the overall air quality impact from the proposed project.

The following equations were used to calculate NOx and PM emission reductions delayed from single and dual engine street sweepers:

Single Engine:

(estimated # of affected street sweepers) x (propulsion engine emission rate) x (fuel use) x (energy content factor) x $(1 \text{ lb/454 grams}) \div (\text{# of annual work days}) = \text{pounds}$ per day of emissions

Dual Engine:

(estimated # of affected street sweepers) x (propulsion engine emission rate) x (fuel use) x (energy content factor) x (1 lb/454 grams) \div (# of annual work days) + (estimated # of affected street sweepers) x (auxilary engine emission rate) x (fuel use) x (energy content factor) x (1 lb/454 grams) \div (# of annual work days) = pounds per day of emissions

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TABLE 1

NOx and PM Emission Reductions Delayed from Single Engine and Dual Engine Street Sweepers

Pollutant	Estimated Number of Affected Street Sweepers	Differential Emission Rate from Propulsion Engine (gram/ bhp-hour)	Differential Emission Rate from Auxilary Engine (gram/ bhp-hour)	Fuel Use ¹ from Propulsion Engine/ Auxilary Engine (gallons per year)	Energy Content Factor (bhp-hour/ gallon)	Number of Work Days per Year	Emission Reductions Delayed (pounds per day)	
Single	Single Engine (20 percent population of the four affected street sweepers)							
NOx	1	1	n/a	7500 / n/a	18.5	250	1.2	
PM	1	0.09	n/a	7500 / n/a	18.5	250	0.1	
Dual Engine (80 percent population of the four affected street sweepers)								
NOx	3	1	3.4	5000 / 2500	18.5	250	6.6	
PM	3	0.09	0.19	5000 / 2500	18.5	250	0.5	

^{1.} From Rule 1186.1 Staff Report, SCAQMD, August 2000

The total overall NOx and PM emission reductions delayed from PAR 1186.1 are calculated and presented in Table 2.

TABLE 2
Total NOx and PM Emission Reductions Delayed from PAR 1186.1

Pollutant	Emission Reductions Delayed from Affected Single Engine Street Sweepers (pounds per day)	Emission Reductions Delayed from Affected Dual Engine Street Sweepers (pounds per day)	Total Emission Reductions Delayed from PAR 1186.1 (pounds per day)
NOx	1.2	6.6	7.8
PM	0.1	0.5	0.6

PAR 1196 Air Quality Impact

Table 3 provides the data needed to calculate the emission reductions delayed from PAR 1196. The projected number of trucks that would have received TICR approval due to one year delay in sunset date is based on number of trucks (42) that have already received or are pending TICR approval for lack of refueling infrastructure during three years of Rule 1196 implementation. Therefore, based on the historical

record, approximately 14 truck operators have applied for TICR approval per year, and since the provision is being delayed one additional year, then an estimated 14 additional operators will be affected by the proposed project. To provide a "worst-case" scenario for determining the emission reductions delayed and based on the past year's application record, it is assumed that a maximum of 28 trucks, double the number who currently take advantage of the provision annually, would be affected by this proposed rule amendment over the year the TICR provision is extended from June 30, 2005 to June 30, 2006. Further, for this particular project, doubling the projected number of vehicles expected to take advantage of the TICR provision is a reasonable assumption because of the increasing turnover of the aging fleets.

To accurately determine the delay of emission reductions, the emission rate used is the difference between the emission rate from alternative-fueled vehicle (1.5 g/bhp-hr for NOx and 0.01 g/bhp-hr for PM) and vehicles with TICR approval (2.5 g/bhp-hr for NOx and 0.1 g/bhp-hr for PM). Thus, the emission rate from the propulsion engines is 1.0 g/bhp-hr for NOx (2.5 g/bhp-hr – 1.5 g/bhp-hr) and 0.09 g/bhp-hr for PM (0.1 g/bhp-hr – 0.01 g/bhp-hr).

The following equation was used to calculate NOx and PM emission reductions delayed from heavy duty vehicles subject to Rule 1196:

(estimated # of affected trucks) x (propulsion engine emission rate) x (fuel use) x (energy content factor) x (1 lb/454 grams) \div (# of annual work days) = pounds per day of emissions

TABLE 3

Total NOx and PM Emission Reductions Delayed from PAR 1196

Pollutant	Estimated Number of Affected Trucks	Differential Emission Rate from Propulsion Engine (gram/bhp- hour)	Fuel Use ¹ from Propulsion Engine (gallons per year)	Energy Content Factor (bhp-hour/ gallon)	Number of Work Days per Year	Emission Reductions Delayed from PAR 1196 (pounds per day)
NOx	28	1	1667	18.5	250	7.6
PM	28	0.09	1667	18.5	250	0.7

^{1.} From Rule 1196 Staff Report, SCAQMD, October 2000

Table 4 summarizes the overall air quality impact from the emission reductions delayed by extending the sunset dates in both PAR 1186.1 and 1196. The NOx and PM emissions do not exceed the SCAQMD's operational CEQA significance

thresholds and, therefore, the proposed project is not considered to have a significant adverse air quality impact.

TABLE 4

Overall NOx and PM Emission Reductions Delayed from PAR 1186.1 and 1196

Emission Reductions Delayed from PAR 1186.1 (pounds per day)		Emission Reductions Delayed from PAR 1196 (pounds per day)	Overall Emission Reductions Delayed from PAR 1186.1 and 1196 (pounds per day)	SCAQMD Operational Significance Threshold (pounds per day)	Significant?
NOx	7.8	7.6	15.4	55	No
PM	0.6	0.7	1.3	150	No

Other Environmental Topics Considered Not Potentially Significant

The remaining 16 environmental topics were determined to have no effect from the proposed project and does not change the conclusions originally made in the PEA for the Fleet Rules (SCAQMD, June, 2000).

In general, the proposed amendments will have few physical environmental effects because the amended rules would allow fleet operators to replace an existing vehicle with a new diesel vehicle to continue performing the same function. For example, under PAR 1186.1 new diesel street sweepers would replace old diesel street sweepers, which would allow the fleet operator to continue street sweeping operations.

<u>Aesthetics</u> – There are no physical changes anticipated at facilities taking advantage of the extended TICR provision. The proposed project will not require any construction activity and, thus, will not cause the obstruction of scenic vistas or resources, or create new sources of substantial light or glare. Because the project will not adversely affect aesthetics, it will not change conclusions regarding aesthetics in the PEA for the Fleet Rules.

<u>Agriculture Resources</u> – The proposed project includes the extension of an existing TICR provision eligible to public fleets of street sweepers and heavy-duty vehicles which are not expected to affect agricultural resources. New vehicles would continue performing existing conditions. Further, no conversion of farmland to non-agricultural uses is required. Because the project will not adversely affect agricultural resources, it will not change conclusions regarding agricultural resources in the PEA for the Fleet Rules.

<u>Biological Resources</u> - The extension of an existing TICR provision will not cause any modifications to the existing facilities and, therefore, will not affect biological resources or any special status plants, animals or natural communities. Because the project will not adversely affect biological resources, it will not change conclusions regarding biological resources in the PEA for the Fleet Rules.

<u>Cultural Resources</u> - The extension of an existing TICR provision will not require the destruction of existing or of new buildings on sites with prehistoric, historic, archaelogical, religious, or ethnic significance. Therefore, no impacts to cultural resources are expected from the proposed project. Because the project will not adversely affect cultural resources, it will not change conclusions regarding cultural resources in the PEA for the Fleet Rules.

<u>Energy</u> – No additional energy resources are needed to take advantage of the TICR provision and, therefore, no impacts to energy resources are expected from the proposed project. Affects to energy resources when the sunset date is reached was analyzed and disclosed in the Final PEA (SCAQMD, June 2000) and the conclusions have not changed or been made substantially worse as a result of implementing the proposed project.

<u>Geological Resources</u> – Since the extension of the existing TICR provision does not require construction of any kind, the proposed project will not expose people or property to geological hazards such as earthquakes, landslides, mudslides, ground failure, or other natural hazards. In addition, the proposed project has no potential to result in changes in topography or surface relief features, and, therefore, no impacts to geological resources are expected from the proposed project. Because the project will not adversely affect geological resources, it will not change conclusions regarding geological resources in the PEA for the Fleet Rules.

<u>Hazards</u> – The extension of the existing TICR provision will allow facilities to continue taking advantage of the provision and, thus, the fuel currently used by affected facilities is not expected to change. Thus, no new hazard impacts are anticipated as a result of the proposed project. Impacts from potential hazards when the sunset date is reached were analyzed and disclosed in the Final PEA (SCAQMD, June 2000) and the conclusions have not changed or made substantially worse as a result of implementing the proposed project.

<u>Hydrology and Water Quality</u> – Allowing the continued use does not increase demand for water supplies or produce wastewater products. Affects to water quality when the sunset date is reached was analyzed and disclosed in the Final PEA (SCAQMD, June 2000) and the conclusions have not changed or made substantially worse as a result of implementing the proposed project.

<u>Land Use and Planning</u> - The extension of the existing TICR provision would not affect land use plans, policis, regulations, or require changes to zoning ordinances or general plans, and, therefore, no impacts to land use and planning are expected from

the proposed project. Because the project will not adversely affect land use and planning, it will not change conclusions regarding land use and planning in the PEA for the Fleet Rules.

<u>Mineral Resources</u> – The extension of the existing TICR provision would not require additional need for mineral resources and, thus, the project proposal will not result in the loss of any mineral resources or increased demand for mineral resources. Because the project will not adversely affect mineral resources, it will not change conclusions regarding mineral resources in the PEA for the Fleet Rules.

<u>Noise</u> - The extension of the existing TICR provision does not require construction of any kind and, if the affected facility is already taking advantage of the provision, no change in the operational activity is expected. No noticeable change in noise levels is expected with because the provision would replace one type of diesel engine vehicle with another diesel vehicle. Because the project will not adversely affect noise, it will not change conclusions regarding noise in the PEA for the Fleet Rules.

<u>Population and Housing</u> – The extension of the existing TICR provision will not require additional workers or a shift in the existing labor force. Therefore, existing affected facilities will not induce population growth, displace housing or people, or require the construction of new or replacement housing. Because the project will not adversely affect population and housing, it will not change conclusions regarding population and housing in the PEA for the Fleet Rules.

<u>Public Services</u> – The extension of the existing TICR provision will not require modifications at the existing affected facilities because the proposed project would allow affected fleet operators to continue purchasing diesel vehicles. Thus, the proposed project does not require additional fire, police or emergency services over and above those currently available to respond to the facility in the case of an emergency. Affects to public services when the sunset date is reached were analyzed and disclosed in the Final PEA (SCAQMD, June 2000) and the conclusions have not changed or been made substantially worse as a result of implementing the proposed project.

Recreation - The extension of the existing TICR provision will not require modifications at the existing affected facilities because the proposed project would allow affected fleet operators to continue purchasing diesel vehicles. Thus, no impact on existing recreational facilities is expected and no new recreational facilities will be required to be constructed as a result of the current project proposal. Because the project will not adversely affect recreation, it will not change conclusions regarding recreation in the PEA for the Fleet Rules.

<u>Solid/Hazardous Waste</u> – No additional solid/hazardous waste is generated when a facility takes advantage of the TICR provision because old vehicles would be replaced by new diesel vehicles instead of alternative fuel vehicles. The effect of replacing old vehicles with new vehicles will not be altered by continuing the TICR

provision. Affects to solid/hazardous waste when the sunset date is reached was analyzed and disclosed in the Final PEA (SCAQMD, June 2000) and the conclusions have not changed or made substantially worse as a result of implementing the proposed project. Because the project will not adversely affect solid/hazardous waste, it will not change conclusions regarding solid/hazardous waste in the PEA for the Fleet Rules.

<u>Transportation/Circulation</u> – Extending the TICR provision does not require purchasing new vehicles. It allows fleet operators to replace existing diesel vehicles with new diesel vehicles, so no new impacts are expected from implementing the proposed project. Affects to transportation/circulation when the sunset date is reached was analyzed and disclosed in the Final PEA (SCAQMD, June 2000) and the conclusions have not changed or made substantially worse as a result of implementing the proposed project.

CONCLUSION

As indicated in the previous discussions, the proposed project does not create any new significant adverse impacts or make substantially worse existing significant effects. As a result, substantial revisions to the previous Program EA analyzing these previously approved projects are not required. An addendum is the appropriate CEQA document for the proposed project because the proposed modifications to the originally adopted rules do not constitute a significant adverse change to these previously approved projects and the changes do not trigger any conditions identified in CEQA Guidelines §15162. The extension of the TICR provision will not result in increased daily emissions or worsen current air quality, but will result in a delay in anticipated emission reductions from these fleet categories. Because the sunset dates will remain, the delay of emission reductions will be temporary. No new significant project-specific or cumulative impacts in any environmental areas were identified, nor would any project-specific or cumulative impacts in any environmental areas be made substantially worse.

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