

What are Localized Significance Thresholds?

- Localized significance thresholds (LSTs) represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project, size, distance to the sensitive receptor, etc. Lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.
- A lead agency's use of the LSTs developed by the AQMD is entirely voluntary.

What pollutants do LSTs apply to?

LSTs have been derived for carbon monoxide (CO), nitrogen dioxide (NO2), and Particulate Matter < 10 microns (PM10) using one of three methodologies depending upon the attainment status of the pollutant. (Ozone is a pollutant of regional concern; therefore, LSTs are not applicable to VOC emissions, which contribute to ozone formation.) LSTs only apply to emissions at a fixed location, including idling emissions, during both project construction and operation. LSTs are not applicable to mobile sources traveling over the roadways.

Why were they developed?

- LSTs were originally developed as part of the AOMD's environmental justice program to update the AQMD's CEQA Air Quality Handbook (Handbook). LSTs were developed in response to environmental justice concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, yet be sensitive to the fact that other public agencies might not have the expertise or adequate financial resources to perform dispersion modeling, the AQMD developed a methodology to establish mass daily emissions that shows whether a project would cause or contribute to localized air quality impacts. If adopted by the AQMD Governing Board, the LST methodology and lookup tables will be incorporated in the Handbook.
- Staff has developed LST methodology and mass rate look-up tables by local SRA that can be used by public agencies to determine whether or not a project may generate significant adverse localized air quality impacts when preparing a CEQA or NEPA environmental analysis. The tables include projects up to 5 acres in size. It should be noted that lead agencies are not precluded from performing project-specific modeling if they prefer more precise results. Larger projects would rely on modeling analysis to determine LSTs.

When preparing an air quality analysis under CEQA or NEPA, lead agencies calculate emissions from the project like they normally do, but in addition to comparing the results to the regional significance thresholds, the lead agency would also compare the results to the LSTs or perform dispersion modeling to determine whether or not a project may have localized air quality impacts.

Is use of LSTs Mandatory?

No, it is not. CEQA encourages the development of "thresholds of significance" that agencies will use in the determination of the significance of environmental impacts. The purpose behind the AQMD's development of LSTs is to provide lead agencies with a tool for assessing the localized air quality impacts of a project.

What is the relationship between LSTs and CEQA?

➤ CEQA Guidelines states that determining whether a project may have a significant effect plays a critical role in the CEQA process. LSTs were designed to provide assistance and guidance for other public agencies to determine whether emissions from projects could generate significant adverse localized air quality impacts. The LSTs are advisory, but if a public agency uses them, it is not necessary for that agency to develop their own thresholds of significance for air quality.

Are localized impact analyses for air quality new?

No, depending on the type of project, an analysis of localized air quality

- impacts is currently performed in many CEQA and NEPA documents. For example, performing a CO hotspots analysis of traffic congestion impacts is an analysis of localized air quality impacts. Projects that emit toxic air contaminants (TAC) typically undergo an analysis of localized air quality impacts relative to cancer and non-cancer health risks. Projects that include stationary source equipment with emissions increases subject to AOMD Regulation XIII - New Source Review, must perform modeling to determine whether or not the project may cause or contribute to an exceedance of any ambient air quality standard (AAQS) or exceed an established detectable change in concentration threshold. Permits for stationary source equipment exceeding either of these two criteria cannot be issued. Projects subject to federal conformity requirements that exceed specific annual emission levels must also undergo an analysis of localized air quality impacts.
- What is new is the AQMD staff's proposal to establish the methodology to devise LSTs and look-up tables that identify mass emissions, which could cause an exceedance of any applicable AAQS at the residence or sensitive receptor.

For more information on LSTs visit our website at www.aqmd.gov/ej/I-4/I4.htm.