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To: [Holly Phipps](#)
Cc: [Melissa Guise](#); [pamela.jardini](#); [James Caruso](#)
Subject: APCD's Review of the Dec 2015 Revised Billig Project's Air Quality Report
Date: 01/13/2016 04:16 PM
Attachments: [PatientVisitorTripDistanceEstimationAJM.xlsx](#)
[BilligProjectOperationalPhaseUnmitigatedAirQualitySignificanceThresholdsEvaluation.xlsx](#)
[Trip_Rates_Worksheet_Supplement\(1-11-16\)-FromYorke-AJMReview.xlsx](#)
[APCDReviewOfTripReductionsIdentifiedInTheBilligDec2015AQreport.xlsx](#)

Hi Holly,

The updated Dec 2015 air quality report for the Billig project:

- 1) Quantified the reductions in daily trips to the facility due to the longer patient stays with a behavioral health hospital relative to a standard hospital ([see file: APCDReviewOfTripReductionsIdentifiedInTheBilligDec2015AQreport.xlsx](#));
- 2) Identified the distance to use for out of county patients/visitors ([see file: PatientVisitorTripDistanceEstimationAJM.xlsx](#)); and
- 3) Evaluated the project's air quality impacts with the assumption that 1/3 of the patient/visitor trips would be from outside of the county.

The APCD has accomplished detailed reviews of these changes and concur with the approach used by Yorke.

The criteria air pollutant side the updated report demonstrates that the project, with 1/3 of the trips being from out of county, would be below the CEQA significant level of 25 lb/day of ozone precursor emissions. Further, SLOCAPCD ran the CalEEMod model to investigate what the impacts would be if 50% and 100% of the patient/visit trips came from outside of the county. The results are that neither of these scenarios would result in the ozone precursor emissions being more than the 25 lb/day threshold. This is the same conclusion as the Sep 2015 version of the air quality report which did not account for patient/visitor trips from outside of the county.

The greenhouse gas impacts were over the 1,150 MT per year CEQA threshold in both the Sep and Dec 2015 versions of the air quality report. **The APCD's recommendation to mitigate these GHG impact to a level of insignificance will be for the project proponent to either:**
a) Demonstrate that the project is consistent with the Energy Wise Plan from the County (the county's climate action plan) or b) mitigate the excess impacts with off-site mitigation.

Note: The SLOCAPCD does not authorize releasing projects from the responsibility of mobile source GHG emissions as is shown at the bottom of Table 3-5 of the Dec 2015 report.

This project proposes to provide 91 beds for the behavioral health portion of the project. That is approximately 33 acute psychiatric inpatient beds/100,000 SLO County residents. This value is less than the 50 beds/100,000 people recommendation stated in the California Hospital Association's (CHA) report that was updated on 12 Sept 2014 and it is more than the California statewide average of about 17 beds/100,000 people which is also listed in the CHA report. This would indicate that the project could have patients/visitors from out of the county. As such, it was important to evaluate the air quality impact from out of county

patients/visitors. This evaluation is included in an APCD generated table found in file which expands on Table 3-5 of the Dec 2015 Yorke revised air quality report: [BilligProjectOperationalPhaseUnmitigatedAirQualitySignificanceThresholdsEvaluation.xlsx](#)

The APCD is satisfied with Dec 2015 air quality report with the exception of the GHG mitigation needs specified above. With regards to GHG, the APCD recommends that the County decide the "In-County" and "Out of County" patient percentages to use that will ensure that worst case emissions GHG impacts can be mitigated fully. If the project proponent elects to use off-site mitigation to address the GHG impacts, they will first need to assess the benefits of actual on-site GHG mitigation measures that will be implementing by the project. The project proponent will need to provide the final operational phase GHG emission evaluation for the project to the APCD for review and approval and work with the APCD to determine the off-site GHG mitigation approach that the project will use to bring their impact to a level of insignificance.

Please let me know if you have any questions.

Sincerely,

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