
4.3 - Air Quality

4.3.1 - Introduction

This section describes the existing air quality setting and potential effects from project implementation on the site and its surrounding area. Descriptions and analysis in this section are based on information contained in the Air Quality Analysis Report prepared by MBA (2008), included in this Draft EIR as Appendix F.

There were two comment letters regarding air quality submitted during the Notice of Preparation comment period. The South Coast Air Quality Management District (SCAQMD) recommended that the following be included in the air quality analysis:

- Use of the 1993 CEQA Air Quality Handbook in the preparation of the analysis;
- Estimation of both construction and operational impacts;
- Estimation of PM_{2.5} emissions;
- Use of the Localized Significance Thresholds (LSTs);
- Preparation of a Health Risk Assessment if the project attracts heavy-duty diesel vehicles; and
- Implement all feasible mitigation measures beyond what is required by law to minimize or eliminate significant adverse air quality impacts.

The following analysis incorporates all of the SCAQMD suggestions, except for the preparation of a Health Risk Assessment. This is because the proposed project does not involve the development of uses that would generate or attract toxic air contaminants near sensitive receptors.

There was another comment letter received by the Mojave Desert Air Quality Management District (MDAQMD). The MDAQMD recommended that the County of Riverside submit the applicable permit applications and fees for the onsite generators to the MDAQMD. The project will submit the appropriate permit information.

4.3.2 - Existing Conditions

The project sites are located within the South Coast Air Basin, the Salton Sea Air Basin, and the Mojave Desert Air Basin. Regional and local air quality is impacted by dominant airflows, topography, atmospheric inversions, location, season, and time of day. The quality of the air can be assessed by measuring the concentrations of certain air pollutants over time. The higher the concentration, the more effects may be observed. Air pollutants have different properties, health effects, and sources. The following is a brief summary of the pollutants of concern. A more detailed description is contained in the Air Quality Analysis Report (Appendix F).

- **Carbon monoxide (CO):** A colorless, odorless toxic gas produced by incomplete combustion of carbon-containing fuels (e.g., gasoline or diesel fuel).
- **Ozone:** A photochemical oxidant that is formed when reactive organic gases and oxides of nitrogen (both byproducts of internal combustion engines) react in the presence of ultraviolet sunlight. Ozone is an energetic combination of three oxygen atoms that, when it comes into contact with a surface, releases its force as chemical energy. When this happens to biological systems (i.e., the respiratory tract and plants), this energy can cause damage to sensitive tissues.
- **Oxides of nitrogen (NO_x):** NO_x is a mixture of nitric oxide and nitrogen dioxide in the atmosphere. Nitric oxide is formed as a byproduct of fuel combustion and quickly reacts with oxygen to form nitrogen dioxide. NO_x emissions contribute to the formation of ozone and particulate matter. Nitrogen dioxide is the only form of NO_x that exists at a level sufficient to cause public health concerns.
- **Sulfur dioxide and sulfates:** In California, sulfur is emitted during the combustion of petroleum-derived fuels (i.e., gasoline and diesel fuel) that contain sulfur. During combustion, sulfur is oxidized to sulfur dioxide (a colorless pungent gas). The sulfur dioxide is then converted to sulfate compounds in the atmosphere.
- **Lead:** Lead is a heavy metal that can accumulate in bone, soft tissue, and blood; can damage the kidneys, liver, and nervous system; and can result in learning disabilities, seizures, and death. Lead concentrations once exceeded the state and national air quality standards by a wide margin, but have not exceeded state or national air quality standards in the area for at least 10 years. Lead is no longer an additive in gasoline, which is the main reason the concentration of lead in the air is low.
- **Suspended particulate matter (PM₁₀ and PM_{2.5}):** Particulate matter is a mixture of small particles that consists of dry solid fragments, droplets of water, or solid cores with liquid coatings. The particles vary in shape, size, and composition. PM₁₀ refers to particulate matter that is 10 microns or less in diameter (1 micron is one-millionth of a meter). PM_{2.5} refers to particulate matter that is 2.5 microns or less in diameter. Sources include road dust, diesel exhaust, erosion of soil, combustion particles (ashes and soot), and tire and brake abrasion.
- **Volatile organic compounds (VOCs):** VOCs are organic compounds that readily evaporate. Reactive organic gases (ROGs) consist of non-methane and oxygenated hydrocarbons. Although all VOCs are not necessarily ROGs, the terms are often interchanged. There are no state or national ambient air quality standards for VOCs; however, they are regulated because they are involved in chemical reactions that contribute to the formation of ozone. In addition, some hydrocarbon components classified as VOCs (i.e., benzene) are thought or known to be hazardous. Sources of VOCs include adhesives, solvents, paints, cooking, fuel, and

combustion. VOCs can interfere with oxygen uptake and can cause coughing, sneezing, headaches, weakness, laryngitis, and bronchitis.

- **Diesel particulate matter (DPM):** Diesel exhaust is a mixture of many particles and gases that is produced when an engine burns diesel fuel. Many compounds found in diesel exhaust are carcinogenic. DPM includes the particles in diesel exhaust. Some of the health effects of DPM include eye, nose, and throat irritation as well as cough, nausea, and phlegm.
- **Visibility reducing particles** are suspended particulate matter. Visibility is the distance through the air that an object can be seen without the use of instrumental assistance. Visibility reducing particles are not assessed in this analysis; however, particulate matter is assessed.
- **Vinyl chloride** is a chlorinated hydrocarbon and a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride is a known carcinogen. The 24-hour state standard for vinyl chloride is 0.01 ppm. The proposed project is not expected to generate or be exposed to vinyl chloride because proposed project uses do not utilize the chemical processes that create this pollutant. Therefore, it is not assessed in this analysis.
- **Hydrogen sulfide** is a flammable, colorless, poisonous gas that smells like rotten eggs. It can irritate the eyes and respiratory tract and cause symptoms like headache, nausea, vomiting, and cough. The 1-hour state standard for hydrogen sulfide is 0.03 ppm. Sources include the combustion of sulfur containing fuels (oil and coal) and organic matter that undergoes putrefaction. It is used in the production of heavy water for nuclear reactors, the manufacture of chemicals, in metallurgy, and as an analytical reagent. The proposed project is not expected to cause exposure to hydrogen sulfide because it will not generate hydrogen sulfide in any substantial quantity. Therefore, hydrogen sulfide is not assessed in this analysis.

4.3.3 - Regulatory Setting

Air pollutants are regulated at the national, state, and air basin level; each agency has a different degree of responsibility. The United States Environmental Protection Agency (EPA) regulates at the national level. The California Air Resources Board (CARB) regulates at the state level. The project sites are located within the jurisdiction of the SCAQMD and the MDAQMD.

The EPA handles global, international, national, and interstate air pollution issues and policies. The EPA sets national vehicle and stationary source emission standards, oversees approval of all State Implementation Plans (SIP), provides research and guidance in air pollution programs, and sets National Ambient Air Quality Standards (NAAQS), also known as federal standards. There are NAAQS for six common air pollutants, called criteria air pollutants, which were identified resulting from provisions of the Clean Air Act of 1970. The six criteria pollutants are ozone, particulate matter (PM₁₀ and PM_{2.5}), nitrogen dioxide, carbon monoxide (CO), lead, and sulfur dioxide. The NAAQS

were set to protect the health of sensitive individuals; thus, the standards continue to change as more medical research is available regarding the health effects of the criteria pollutants.

CARB has overall responsibility for statewide air quality maintenance and air pollution prevention. The SIP for the State of California is administered by CARB. A SIP is a document prepared by each state describing existing air quality conditions and measures that will be followed to attain and maintain NAAQS. CARB also administers California ambient air quality standards, or state standards, for the ten air pollutants designated in the California Clean Air Act. The ten state air pollutants are visibility reducing particulates, hydrogen sulfide, sulfates, vinyl chloride, and the six criteria pollutants.

Ambient Air Quality Standards

The national and state AAQS are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. The health effects of a pollutant are a function of the dose of the pollutant, the length of exposure, the pollutant's properties, and the body's ability to excrete the pollutant. Table 4.3-1 identifies the current state and national standards, as well as the relevant effects.

Table 4.3-1: Air Quality Standards

Air Pollutant	Averaging Time	California Standard	National Standard	Most Relevant Effects
Ozone	1 Hour	0.09 ppm	—	(a) Decrease of pulmonary function and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; (f) Property damage.
	8 Hour	0.070 ppm	0.075 ppm	
Carbon Monoxide (CO)	1 Hour	20 ppm	35 ppm	(a) Aggravation of angina pectoris (chest pain or discomfort) and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; (d) Possible increased risk to fetuses.
	8 Hour	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO ₂)	1 Hour	0.18 ppm*	—	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; (c) Contribution to atmospheric discoloration.
	Mean	0.030 ppm*	0.053 ppm	

Table 4.3-1 (Cont.): Air Quality Standards

Air Pollutant	Averaging Time	California Standard	National Standard	Most Relevant Effects
Sulfur Dioxide (SO ₂)	1 Hour	0.25 ppm	—	Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma.
	24 Hour	0.04 ppm	0.14 ppm	
	Mean	—	0.030 ppm	
Particulate Matter (PM ₁₀)	24 hour	50 µg/m ³	150 µg/m ³	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; (c) Increased risk of premature death from heart or lung diseases in the elderly.
	Mean	20 µg/m ³	—	
Particulate Matter (PM _{2.5})	24 Hour	—	35 µg/m ³	
	Mean	12 µg/m ³	15 µg/m ³	
Sulfates	24 Hour	25 µg/m ³	—	(a) Decrease in ventilatory function; (b) Aggravation of asthmatic symptoms; (c) Aggravation of cardio-pulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; (f) Property damage.
Lead	30-day	1.5 µg/m ³	—	(a) Learning disabilities; (b) Impairment of blood formation and nerve conduction.
	Quarter	—	1.5 µg/m ³	
Abbreviations: ppm = parts per million (concentration) µg/m ³ = micrograms per cubic meter Mean = Annual Arithmetic Mean 30-day = 30-day average Quarter = Calendar quarter Source: MBA 2008.				

South Coast Air Quality Management District

The air pollution control agency for the South Coast Air Basin and the Salton Sea Air Basin (SSAB) is the SCAQMD. SCAQMD is responsible for controlling emissions primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the basin. SCAQMD, in coordination with Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the basin. An AQMP is a plan prepared by an air pollution control district for a county or region designated as a nonattainment area for bringing the area into compliance with the requirements of the national and/or California ambient air quality standards. (Air basins where ambient air quality standards are exceeded are referred to as “nonattainment” areas.)

The 2007 AQMP was adopted by the SCAQMD on June 1, 2007. On July 13, 2007, the SCAQMD Board adopted 2007 Final AQMP Transportation Conformity Budgets and directed the Executive Officer to forward them to CARB for its approval and subsequent submittal to the U.S. EPA. On September 27, 2007, CARB adopted the State Strategy for the 2007 SIP and the 2007 AQMP as part of the SIP.

The 2007 AQMP incorporates significant new emissions inventories, ambient measurements, scientific data, control strategies, and air quality modeling. The 2007 AQMP outlines a detailed strategy for meeting the federal health-based standards for PM_{2.5} by 2015 and 8-hour ozone by 2024 while accounting for and accommodating future expected growth. Most of the reductions will be from mobile sources, which is currently responsible for about 75 percent of all smog and particulate forming emissions. The 2007 AQMP includes 37 control measures proposed for adoption by the SCAQMD, including measures to reduce emissions from new commercial and residential developments, more reductions from industrial facilities, and reductions from wood-burning fireplaces and restaurant charbroilers.

The 2003 Coachella Valley PM₁₀ State Implementation Plan (2003 CVSIP) meets all applicable federal Clean Air Act (FCAA) requirements, including the most stringent measures analysis, control measures, and attainment demonstration. The 2003 CVSIP contains updated emissions inventories, emission budgets, and attainment modeling. The EPA approved the transportation conformity budgets in the 2003 CVSIP with an effective date of April 9, 2004.

The local air quality can be evaluated by reviewing relevant air pollution concentrations near the project area. SCAQMD has divided the basin into 38 Source Receptor Areas (SRA) and operates monitoring stations within each one. Existing levels of ambient air quality and historical trends and Projections of air quality in the project area are best documented from measurements made near the project site. Project sites are located within SRAs 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, and 35.

The 2007 AQMP summarizes the air quality in the South Coast Air Basin. In 2005, carbon monoxide, nitrogen dioxide, sulfur dioxide, sulfate, and lead concentrations were below the standards. However, ozone, PM₁₀, and PM_{2.5} exceed the standards. Therefore, the pollutants of concern are ozone, PM₁₀, and PM_{2.5} in the South Coast Air Basin. In the SSAB, the ozone and PM₁₀ standards often exceed the ambient air quality standards.

Mojave Desert Air Quality Management District

The MDAQMD is in charge of parts of the Mojave Desert Air Basin (MDAB). The MDAB is classified as a dry-hot desert climate, with portions classified as dry-very hot desert, to indicate at least three months have maximum average temperatures over 100.4° F.

The current ozone air quality management plan for the MDAB is the 2004 Attainment Plan. The 2004 Attainment Plan lays out a strategy to attain the federal ozone standards by 2007. There is a draft Federal 8-Hour Ozone Attainment Plan for the Western Mojave Desert Nonattainment Area that is expected to be adopted on June 9, 2008. The 2008 Attainment Plan contains strategies to attain the ozone standard in the Western Mojave Desert Nonattainment Area by the year 2021.

The PM₁₀ attainment plan for the MDAB is the Final Mojave Desert Planning Area Federal PM₁₀ Attainment Plan. Strategies to reduce PM₁₀ levels were focused on unpaved road travel, construction, and local disturbed areas in populated areas, and certain stationary sources operating in the rural Lucerne Valley. However, control measures to reduce dust from regional wind events are not feasible.

Attainment Status

Air basins where ambient air quality standards are exceeded are designated as “nonattainment” areas. If standards are met, the area is designated as an “attainment” area. If there is inadequate or inconclusive data to make a definitive attainment designation, they are considered “unclassified.”

The South Coast Air Basin is designated as nonattainment for the state and national PM₁₀ and PM_{2.5}, standards. The South Coast Air Basin is also in nonattainment for the state ozone 1-hour standard and the national 8-hour ozone standard. The SSAB is in nonattainment for ozone and PM₁₀. The MDAB is in nonattainment for ozone, PM₁₀, and PM_{2.5}.

Applicable Rules and Regulations

South Coast Air Quality Management District

The AQMP establishes a program of rules and regulations administered by SCAQMD to obtain attainment of the state and national air quality standards. The rules and regulations that apply to this project include, but are not limited to, the following:

- SCAQMD Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- SCAQMD Rule 403 governs emissions of fugitive dust during construction and operation activities. Compliance with this rule is achieved through application of standard best management practices, such as application of water or chemical stabilizers to disturbed soils, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 miles per hour (mph), sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph, and establishing a permanent ground cover on finished sites. Rule 403 also requires submission of a Fugitive Dust Plan to the SCAQMD for projects that disturb over 100 acres of soil or move 5,000 cubic yards per day of material.
- SCAQMD Rule 1470, Requirements for Stationary Diesel-fueled Internal Combustion and Other Compression Ignition Engines, applies to any person who owns or operates a stationary CI engine in the SCAQMD with a rated brake horsepower greater than 50.

Mojave Desert Air Quality Management District

The rules that would apply to the sites located within the MDAQMD include, but are not limited, to the following:

- MDAQMD Rule 403 - Fugitive Dust. The purpose of this rule is to reduce emissions of fugitive dust. The rule indicates that a person shall not cause or allow the emissions of fugitive dust from any transport, handling, construction or storage activity so that the presence of such dust remains visible in the atmosphere beyond the property line of the emission source. The rule indicates that every reasonable precaution shall be taken to minimize fugitive dust emissions from wrecking, excavation, grading, clearing of land, and solid waste disposal operations.
- MDAQMD Rule 462 - Organic Liquid Loading. The purpose of this rule is to limit the emissions of VOCs and toxic compounds (such as benzene) from Organic Liquid Loading (any organic liquid, including gasoline), and in conjunction with Rules 461 and 463, limit the emissions from the storage, transfer, and dispensing of organic liquids.
- MDAQMD Rule 463 - Storage of Organic Liquids. The purpose of this rule is to limit the emissions of VOC and toxic compounds (such as benzene) during the Storage of Organic Liquids, and in conjunction with Rules 461 and 462, limits the emissions from the storage, transfer, and dispensing of organic liquids, including bulk facilities, retail service stations, and others, the transport of fuels between these facilities and the transfer of fuel into motor vehicle tanks.
- MDAQMD Rule 1520, Control of Toxic Air Contaminants from Existing Sources, would apply to the diesel generator to be operating full time within the MDAQMD. The rule is designed to reduce the health risk associated with emissions of toxic air contaminants from existing Facilities.
- Regulation XIII, New Source Review, consists of several rules that set forth the requirements for the preconstruction review of all new or modified Facilities. The provisions of this Regulation shall apply to any new or modified Facility or Emissions Unit, which requires a permit pursuant to the provisions of District Regulation II. Regulation XIII also ensures that the construction, or modification of Facilities subject to this Regulation, does not interfere with the attainment and maintenance of Ambient Air Quality Standards. It also ensures that there is no net increase in the emissions of any nonattainment air pollutants from new or modified Major Facilities which emit or have the potential to emit any nonattainment air pollutant in an amount greater than or equal to the amounts set forth in Rule 1303(B)(1), which is currently 25 pounds per day. If a Facility emits more than 25 pounds per day, it has to be equipped with Best Available Control Technology. A Facility may also have to offset its emissions, if greater than the thresholds described in the Regulation.

4.3.4 - Thresholds of Significance

According to the CEQA Guidelines' Appendix G, Environmental Checklist, to determine whether impacts to air quality are significant environmental effects, the following questions are analyzed and evaluated:

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

- a.) Conflict with or obstruct implementation of the applicable air quality plan?
- b.) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- c.) Result in 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)?
- d.) Expose sensitive receptors to substantial pollutant concentrations?
- e.) Create objectionable odors affecting a substantial number of people?

South Coast Air Quality Management District Thresholds

CEQA Guidelines define a significant effect on the environment as “a substantial, or potentially substantial, adverse change in the environment.” To determine if a project would have a significant impact on air quality, the type, level, and impact of emissions generated by the project must be evaluated. While the final determination of whether or not a project is significant is within the purview of the lead agency pursuant to Section 15064(b) of the State CEQA Guidelines, SCAQMD recommends that its quantitative air pollution thresholds be used to determine the significance of project emissions. If the lead agency finds that the project has the potential to exceed these air pollution thresholds, the project should be considered to have significant air quality impacts.

Regional Thresholds

The following regional significance thresholds have been established by SCAQMD. Projects within the South Coast Air Basin region with construction or operation related emissions in excess of any of the thresholds presented in Table 4.3-2 are considered significant. For sites located in the SSAB, the construction threshold applies to both construction and operation.

Table 4.3-2: South Coast Air Quality Management District Regional Thresholds

Pollutant	Construction ¹ (pounds per day)	Operation ² (pounds per day)
Oxides of Nitrogen (NO _x)	100	55
Volatile Organic Compounds (VOC)	75	55
Particulate Matter (PM ₁₀)	150	150
Particulate Matter (PM _{2.5})	55	55
Oxides of Sulfur (SO _x)	150	150
Carbon Monoxide (CO)	550	550
1 Note that the thresholds for the Salton Sea Air Basin for both construction and operation are the construction thresholds. 2 Operational thresholds only apply to the South Coast Air Basin. Source: MBA 2008.		

Local Significance Thresholds

The SCAQMD Governing Board adopted a methodology for calculating localized air quality impacts through localized significance thresholds (LSTs), which is consistent with SCAQMD's Environmental Justice Enhancement Initiative I-4. LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable state or national ambient air quality standard. The LSTs are developed based on the ambient concentrations of that pollutant for each source receptor area and are applicable to NO_x, CO, PM₁₀, and PM_{2.5}.

The LSTs were obtained from the look-up tables in the SCAQMD Final LST Methodology (2003) for a 1-acre project. The distance to the nearest receptor was chosen to be 25 meters because that is where it was assumed the nearest sensitive receptor would be located. The project sites are located within SRAs 19, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, and 35. Therefore, the most stringent LSTs were chosen from the look up tables from the SRAs listed above and are summarized in Table 4.3-3.

Table 4.3-3: South Coast Air Quality Management District Localized Thresholds

Pollutant	Localized Significance Threshold (pounds per day)	Source Receptor Area
Nitrogen Dioxide	160	19
Carbon Monoxide	509	35
PM ₁₀	4	Multiple
PM _{2.5}	3	Multiple
Source: MBA 2008.		

Mojave Desert Air Quality Management District Thresholds

Regional significance thresholds have been established by MDAQMD. Projects within the MDAQMD jurisdiction with construction or operation related emissions in excess of any of the thresholds presented in Table 4.3-4 are considered significant. Note that the thresholds for construction and operation are the same. The MDAQMD does not have an equivalent to the SCAQMD’s LSTs, but this assessment utilizes the SCAQMD’s LSTs for consistency purposes and to ensure that the air quality standards are not violated.

Table 4.3-4: Mojave Desert Air Quality Management District Regional Thresholds

Pollutant	Threshold (tons per year)	Threshold (pounds per day)
Oxides of Nitrogen (NO _x)	25	137
Volatile Organic Compounds (VOC)	25	137
Particulate Matter (PM ₁₀)	15	82
Particulate Matter (PM _{2.5})*	15	82
Oxides of Sulfur (SO _x)	25	137
Carbon Monoxide (CO)	100	548
* The MDAQMD does not have published thresholds for PM2.5; therefore, the thresholds for PM10 were used. Source: MBA 2008.		

4.3.5 - Project Impacts and Mitigation Measures

This section discusses potential impacts associated with the development of the project and provides mitigation measures where appropriate.

Construction Related Impacts

Impact 4.3-1 **The project would exceed the significance thresholds during the construction phase of the project.**

Regional Impact Analysis

Short-term impacts refer to emissions generated during construction because they occur on a short-term basis. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and prevailing weather conditions. Construction emissions result from onsite and offsite activities. Onsite emissions principally consist of exhaust emissions (NO_x, SO_x, CO, VOC, PM₁₀, and PM_{2.5}) from heavy-duty construction equipment, motor vehicle operation, and fugitive dust (mainly PM₁₀) from disturbed soil. Offsite emissions are caused by motor vehicle exhaust from delivery vehicles, worker traffic, and road dust (PM₁₀ and PM_{2.5}). Major construction-related activities include the following: grading and clearing and building construction of the onsite structures.

The County plans to construct five to six sites at a time. The typical construction period is 120 days, with about 2-3 weeks of ground disturbing/excavation activities at the beginning of the construction period. Four to six workers will typically be working at the sites during any given time. The typical lease area will be 100 feet by 100 feet. Some sites may also utilize an additional 100 feet by 100 feet for staging the construction equipment. Excavation will be confined to the lease area. There would only be two roads constructed, each about 500 feet in length and no more than 20 feet wide. The other sites will utilize existing roadways. The County does not anticipate demolishing any structures; any abandoned structures will be left in place or removed. In summary, it is anticipated that each site would not impact more than 1 acre of property.

South Coast Air Quality Management District

It is assumed for purposes of this analysis that six sites would be constructed at the same time for projects located within the SCAQMD, either in the SSAB or in the South Coast Air Basin. Note that the emissions estimated during grading assume compliance with SCAQMD Rule 403. Rule 403 applies to any activity or man-made condition capable of generating fugitive dust.

Emissions during construction are shown in Table 4.3-5. The emission estimates were derived from the CARB URBEMIS2007 Version 9.2 emission model. As shown in the table, if six sites were conducting grading at the same time, emissions would not exceed the SCAQMD regional thresholds. Therefore, without mitigation, the short-term emissions would have a less than significant regional impact.

Table 4.3-5: Construction Emissions (SCAQMD, Unmitigated)

Source	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Grading for one site (includes road construction and worker vehicles)	2	16	9	0	3	1
Building/construction for one site	1	8	3	0	<1	<1
Maximum: grading for six sites*	12	96	54	0	18	6
SCAQMD Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
*The maximum values are the grading emissions for one site multiplied by six. VOC = volatile organic compounds NO _x = nitrous oxides CO = carbon monoxide SO _x = sulfur oxides PM ₁₀ and PM _{2.5} = particulate matter <1 = less than one Source: MBA 2008.						

Mojave Desert Air Quality Management District

It is assumed for purposes of this analysis that six sites would be constructed at the same time in the area under the MDAQMD's jurisdiction. MDAQMD Rule 403, which governs emissions of fugitive

dust, does not specify best available control measures. The emission estimates were derived from the CARB URBEMIS2007 Version 9.2 emission model.

Daily emissions during construction are shown in Table 4.3-6. If six sites were conducting grading on the same day, emissions of PM₁₀ would exceed the MDAQMD regional daily threshold.

Therefore, without mitigation, the short-term emissions are considered to have a significant regional impact.

Table 4.3-6: Construction Emissions (MDAQMD, Daily, Unmitigated)

Source	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Grading for one site (includes road construction and worker vehicles)	2	16	9	0	16	4
Building/construction for one site	1	8	3	0	<1	<1
Maximum: grading for six sites*	12	96	54	0	96	24
MDAQMD Daily Threshold	137	137	548	137	82	82
Exceed Threshold?	No	No	No	No	Yes	No
* The maximum values are the grading emissions for one site multiplied by six sites. VOC = volatile organic compounds NO _x = nitrous oxides CO = carbon monoxide SO _x = sulfur oxides PM ₁₀ and PM _{2.5} = particulate matter <1 = less than one Source: MBA 2008.						

Annual emissions are shown in Table 4.3-7. It was assumed that eighteen sites would be constructed in one year because the County anticipates completion of one site in 120 days. Emissions would not exceed the MDAQMD annual significance threshold.

Table 4.3-7: Construction Emissions (MDAQMD, Annual, Unmitigated)

Source	Emissions (tons per year)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Grading for one site (includes road construction and worker vehicles)	0.02	0.14	0.08	0.00	0.13	0.03
Building/construction for one site	0.05	0.45	0.19	0.00	0.02	0.02
Subtotal	0.07	0.59	0.27	0.00	0.15	0.05
Maximum*	1.26	10.62	4.86	0.00	2.70	0.90
MDAQMD Annual Threshold	25	25	100	25	15	15
Exceed Threshold?	No	No	No	No	No	No
* Maximum = subtotal multiplied by 18 sites. VOC = volatile organic compounds NO _x = nitrous oxides CO = carbon monoxide SO _x = sulfur oxides PM ₁₀ and PM _{2.5} = particulate matter Source: MBA 2008.						

Localized Impact Analysis

The onsite emissions during construction of one site in the SCAQMD's jurisdiction are compared with the localized significance thresholds and are summarized in Table 4.3-8. The emissions take into account SCAQMD Rule 403. The onsite emissions were generated by URBEMIS2007. Onsite emissions are from fugitive dust during grading and off-road diesel emissions. As shown in Table 4.3-8, unmitigated emissions during construction do not exceed the localized significance thresholds.

Table 4.3-8: Localized Significance Analysis (SCAQMD, Unmitigated)

Activity	Onsite Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Grading	16.08	7.38	3.32	1.22
Building	8.27	3.45	0.34	0.31
Maximum Daily Emissions	16.08	7.38	3.32	1.22
Localized Significance Threshold	160	509	4	3
Exceed Threshold?	No	No	No	No
Note: Each of the above activities does not occur at the same time; therefore, the maximum daily emissions represent the maximum emissions that would occur in one day. Source: MBA 2008.				

The onsite emissions for the sites located within the MDAQMD jurisdiction are shown in Table 4.3-9. Although the MDAQMD does not utilize LSTs, they are used for the sites in the district for consistency purposes. The particulate matter emissions do not take into account SCAQMD Rule 403 as the SCAQMD emissions do. As shown in the table, emissions exceed the LSTs for PM₁₀ and PM_{2.5}. Therefore, this results in a potentially significant localized impact.

Table 4.3-9: Localized Significance Analysis (MDAQMD, Unmitigated)

Activity	Onsite Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Grading for one site	16.08	7.38	15.73	3.82
Building for one site	8.27	3.45	0.34	0.31
Maximum Daily Emissions	16.08	7.38	15.73	3.82
Localized Significance Threshold	160	509	4	3
Exceed Threshold?	No	No	Yes	Yes
Note: Each of the above activities does not occur at the same time; therefore, the maximum daily emissions represent the maximum emissions that would occur in one day. Source: MBA 2008.				

Level of Significance Before Mitigation

Significant.

Mitigation Measures

- AQ-1** All sites shall comply with the SCAQMD Rule 403 requirements, regardless of location.
- AQ-2** During project construction, the developer shall require all contractors not to idle construction equipment onsite for more than five minutes.
- AQ-3** During project construction, the workers should carpool to the greatest extent practical. Workers shall be informed in writing of this requirement. At a minimum, the workers shall leave their vehicles at a central location near the site so that fugitive dust generated by travel on dirt roads is limited.

Level of Significance After Mitigation

Less than significant.

As shown in Table 4.3-10 and Table 4.3-11, emissions do not exceed the regional or localized significance thresholds with mitigation.

Table 4.3-10: Construction Emissions (MDAQMD, Daily, Mitigated)

Source	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Grading for one site (includes road construction and worker vehicles)	2	16	9	0	3	1
Building/construction for one site	1	8	3	0	<1	<1
Maximum: grading for six sites*	12	96	54	0	18	6
MDAQMD Threshold	137	137	548	137	82	82
Exceed Threshold?	No	No	No	No	No	No
*The maximum values are the grading emissions for one site multiplied by six sites. VOC = volatile organic compounds NO _x = nitrous oxides CO = carbon monoxide SO _x = sulfur oxides PM ₁₀ and PM _{2.5} = particulate matter <1 = less than one Source: MBA 2008.						

Table 4.3-11: Localized Significance Analysis (MDAQMD, Mitigated)

Activity	Onsite Emissions (pounds per day)			
	NO _x	CO	PM ₁₀	PM _{2.5}
Grading for one site	16.08	7.38	3.32	1.22
Building for one site	8.27	3.45	0.34	0.31
Maximum Daily Emissions	16.08	7.38	3.32	1.22
Localized Significance Threshold	160	509	4	3
Exceed Threshold?	No	No	No	No
Note: Each of the above activities does not occur at the same time; therefore, the maximum daily emissions represent the maximum emissions that would occur in one day. Source: MBA 2008.				

Operation Related Impacts

Impact 4.3-2 **The project could exceed the regional significance thresholds during operation.**

Impact Analysis

Operational, or long-term, emissions occur over the life of the project. The only sources of operational emission from the project are from generators and worker trips to the sites for site maintenance. There would be two full-time generators operating within the SSAB. There would be approximately 50 emergency generators. They would run once a week for a half an hour for maintenance purposes. More details and assumptions regarding the emission estimation are contained in the Air Quality Analysis (MBA 2008).

It was assumed for worst-case purposes that there would be 50 emergency generators in the South Coast Air Basin and that all five daily worker vehicle trips would occur in the South Coast Air Basin. As shown in Table 4.3-12, the project's emissions do not exceed the SCAQMD's regional thresholds and are considered less than significant.

Table 4.3-12: Operational Emissions (SCAQMD, South Coast, Unmitigated)

Source	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Worker vehicles	0.10	0.19	1.14	0.00	0.17	0.04
Emergency generators	4.08	19.78	64.05	0.03	0.13	0.12
Total	4.18	19.97	65.19	0.03	0.30	0.16
SCAQMD South Coast Regional Significance Threshold	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No
VOC = volatile organic compounds NO _x = nitrous oxides CO = carbon monoxide SO _x = sulfur oxides PM ₁₀ and PM _{2.5} = particulate matter Sources: MBA 2008.						

The two generators that would be running full time are located within the SSAB and the SCAQMD portion of the MDAB. There are six other sites within the basins; it was assumed that each site would require an emergency generator. The emissions are shown in Table 4.3-13. As shown in the table, the emissions do not exceed the operational SCAQMD Salton Sea Air Basin threshold.

Table 4.3-13: Operational Emissions (SCAQMD, Salton Sea and Mojave Desert Air Basins, Unmitigated)

Source	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Worker vehicles	0.10	0.19	1.14	0.00	0.17	0.04
Full time diesel generator	0.99	8.12	4.48	1.12	0.90	0.83
Full time propane generator	3.92	18.98	61.49	0.03	0.13	0.12
Emergency generators	0.49	2.37	7.69	0.00	0.02	0.01
Total	5.50	29.66	74.80	1.15	1.22	1.00
SCAQMD Salton Sea Regional Significance Threshold	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No
VOC = volatile organic compounds NO _x = nitrous oxides CO = carbon monoxide SO _x = sulfur oxides PM ₁₀ and PM _{2.5} = particulate matter Sources: MBA 2008.						

The daily and annual emissions for sites located within the MDAQMD’s jurisdiction are displayed in Table 4.3-14 and Table 4.3-15, respectively. As shown in the tables, the emissions do not exceed the significance thresholds.

Table 4.3-14: Operational Emissions (MDAQMD, Daily, Unmitigated)

Source	Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Worker vehicles	0.10	0.19	1.14	0.00	0.17	0.04
Emergency generators	0.65	3.16	10.25	0.00	0.02	0.02
Total	0.75	3.35	11.39	0.00	0.19	0.06
MDAQMD Daily Threshold	137	137	548	137	82	82
Exceed Threshold?	No	No	No	No	No	No
VOC = volatile organic compounds NO _x = nitrous oxides CO = carbon monoxide SO _x = sulfur oxides PM ₁₀ and PM _{2.5} = particulate matter <1 = less than one Sources: Emissions from worker vehicles are from URBEMIS output (Appendix F, Attachment A, all pollutants except CO are during the winter season. All other emissions are from spreadsheets located in Appendix F, Attachment B.						

Table 4.3-15: Operational Emissions (MDAQMD, Annual, Unmitigated)

Source	Emissions (tons per year)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Worker vehicles	0.02	0.03	0.21	0.00	0.03	0.01
Emergency generators	0.02	0.08	0.27	0.00	0.00	0.00
Total	0.04	0.11	0.48	0.00	0.03	0.01
MDAQMD Annual Threshold	25	25	100	25	15	15
Exceed Threshold?	No	No	No	No	No	No
VOC = volatile organic compounds NO _x = nitrous oxides CO = carbon monoxide SO _x = sulfur oxides PM ₁₀ and PM _{2.5} = particulate matter <1 = less than one Sources: MBA 2008.						

Additional Sites

The program-level analysis for this project allows any additional sites to tier off this analysis. However, if the County installs additional full time generator sites, the emissions from these potential sites would need to stay below the regional significance thresholds. Therefore, additional mitigation is suggested to ensure that emissions remain below significance thresholds.

Level of Significance Before Mitigation

Less than significant.

Mitigation Measures

AQ-4 If the County wishes to develop additional sites in the future besides those assessed in this analysis, any additional full time generator sites shall be limited to one in the jurisdiction of the SCAQMD (South Coast Air Basin), three in the jurisdiction of the SCAQMD (Salton Sea Air Basin), and six in the jurisdiction of the MDAQMD.

Level of Significance After Mitigation

Less than significant.

Air Quality Plan

Impact 4.3-3 The project could conflict with or obstruct implementation of the applicable air quality plan.
[CEQA Air Quality Threshold 3(a)]

Impact Analysis

The CEQA Guidelines indicate that a significant impact would occur if the proposed project would conflict with or obstruct implementation of the applicable air quality plan.

South Coast Air Quality Management District

According to the SCAQMD, the project is consistent with the AQMP if the project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new

violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The project will also comply with all of the SCAQMD's applicable rules and regulations.

Although there is no known guidance that correlates AQMP consistency with the SCAQMD regional thresholds, it is common to use the thresholds in assessing AQMP compliance. The regional analysis demonstrated that emissions would be below the regional significance thresholds.

In summary, the project is consistent with the AQMP.

Mojave Desert Air Quality Management District

The MDAQMD Guidelines (2007) states the following:

A project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan. A project is conforming if it complies with all applicable District rules and regulations, complies with all proposed control measures that are not yet adopted from the applicable plan(s), and is consistent with the growth forecasts in the applicable plan(s) (or is directly included in the applicable plan). Conformity with growth forecasts can be established by demonstrating that the project is consistent with the land use plan that was used to generate the growth forecast. An example of an inconsistent project would be one that increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan).

The project will comply with all applicable rules and regulations and will comply with any proposed control measures that are not yet adopted from those plans. Applicable permits obtained by the MDAQMD will cover emissions from onsite generators. The project will not be associated with a large number of trips or vehicle miles traveled. The project is not associated with a land use plan or growth forecasts because the project is not a typical residential, commercial, or industrial project. The project will provide appropriate and adequate telecommunication coverage to County emergency services personnel and their cooperators over at least 95 percent of the County's land area. The project will also allow for interoperability between providers in a manner that assures adequate communication capability during emergency incidents that cross jurisdictional boundaries or require multiple-agency cooperation. The project provides an increase in efficiency for an existing operation. Therefore, the project will not conflict with the MDAQMD attainment plans.

Level of Significance Before Mitigation

Less than significant.

Air Quality Standards / Violations

Impact 4.3-4 **The project could violate an air quality standard or contribute substantially to an existing or projected air quality violation.**
[CEQA Air Quality Threshold 3(b)]

Impact Analysis

The CEQA Guidelines indicate that a significant impact would occur if the proposed project would violate any air quality standard or contribute substantially to an existing or projected air quality violation.

The South Coast Air Basin and the MDAB are in nonattainment for PM₁₀, PM_{2.5}, and ozone. The SSAB is in nonattainment for ozone and PM₁₀. Levels of PM₁₀ (and PM_{2.5} in the South Coast and Mojave Desert Air Basins) are locally high enough that contributions from new sources may add to the concentrations of those pollutants and contribute to a projected air quality violation. Although background levels of ozone are high in the basins, the project alone (without other cumulative sources) would not contribute substantially to a projected air quality violation of ozone.

The localized construction analysis uses thresholds that represent the maximum emissions for a project that would not cause or contribute to an exceedance of the most stringent applicable national or state ambient air quality standard. These LSTs are specific to each source receptor area (SCAQMD 2003). If the project results in emissions that do not exceed those thresholds, it would not cause or contribute to a local exceedance of the standard. The localized construction analysis demonstrated that the sites located in the SCAQMD jurisdiction would not exceed the localized thresholds for CO, nitrogen dioxide, PM₁₀, or PM_{2.5}. However, the sites located within the MDAQMD would exceed the LSTs for PM₁₀ and PM_{2.5}. Therefore, according to this criterion, the air pollutant emissions during construction would result in a significant impact and could result in a violation of an ambient air quality standard for PM₁₀ and PM_{2.5}.

During operation, the emissions of criteria pollutants would not be great enough to cause an exceedance of any standards.

Level of Significance Before Mitigation

Significant.

Mitigation Measures

Refer to mitigation measures AQ-1 through AQ-3.

Level of Significance After Mitigation

Less than significant.

Cumulative Criteria Pollutants

Impact 4.3-5	The project could result in 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). [CEQA Air Quality Threshold 3(c)]
---------------------	--

Impact Analysis

Section 15130(b) of the CEQA Guidelines states the following:

The following elements are necessary to an adequate discussion of significant cumulative impacts: 1) Either: (A) A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or (B) A summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or areawide conditions contributing to the cumulative impact.

In accordance with CEQA Guidelines 15130(b), this analysis of cumulative impacts incorporates a summary of projections. The following tiered approach is to assess cumulative air quality impacts.

1. Consistency with the regional thresholds for nonattainment pollutants;
2. Project consistency with existing air quality plans;
3. Assessment of the cumulative health effects of the pollutants.

Regional Analysis

If an area is in nonattainment for a criteria pollutant, then the background concentration of that pollutant has historically been over the ambient air quality standard. It follows that if a project exceeds the regional threshold for that nonattainment pollutant, then it would result in a cumulatively considerable net increase of that pollutant and result in a significant cumulative impact.

The South Coast Air Basin and the MDAB are in nonattainment for PM₁₀, PM_{2.5}, and ozone. The SSAB is in nonattainment for ozone and PM₁₀. Therefore, if the project exceeds the regional thresholds for PM₁₀ or PM_{2.5}, then it contributes to a cumulatively considerable impact for those pollutants. Additionally, if the project exceeds the regional threshold for NO_x or VOC, then it follows that the project would contribute to a cumulatively considerable impact for ozone.

The regional significance analysis of construction emissions demonstrated that emissions in the MDAQMD could exceed the regional significance threshold for PM₁₀. Therefore, emissions of PM₁₀ during construction could cumulatively contribute to a net increase of a nonattainment pollutant.

Plan Approach

The geographic scope for cumulative air quality impacts are the basins in which the project sites are located because air pollutants generated by sources within the basins circulate and are often trapped in

the basins. The air districts are required to prepare and maintain an AQMP and a State Implementation Plan to document the strategies and measures to be undertaken to reach attainment of ambient air quality standards. While the air districts do not have direct authority over land use decisions, changes in land use and circulation planning are necessary to maintain clean air. The air districts evaluated their respective basins when developing the attainment and management plans.

According to Impact 4.3-3, the project is consistent with the applicable attainment and management plans. Therefore, the project results in a less than significant impact according to this criterion.

Cumulative Health Impacts

The South Coast Air Basin and the MDAB are in nonattainment for PM₁₀, PM_{2.5}, and ozone. The SSAB is in nonattainment for ozone and PM₁₀. That means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (i.e., elderly, children, and the sick). Therefore, when the concentration of those pollutants exceeds the air quality standard, it is likely that some sensitive individuals in the population experience health effects. The health effects are a factor of the dose-response curve. Concentration of the pollutant in the air (dose), the length of time exposed, and the response of the individual are factors involved in severity and nature of health impacts. If a significant health impact results from project emissions, it does not mean that 100 percent of the population would experience health effects.

It was determined that PM₁₀ emissions during construction of sites within the MDAQMD would exceed the regional significance thresholds before mitigation. Therefore, the project could result in a significance cumulative contribution to PM₁₀. Sensitive individuals may experience health impacts when concentrations of those pollutants exceed the ambient air quality standards. Health impacts from particulate matter may include the following: (a) exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) declines in pulmonary function growth in children; (c) and/or increased risk of premature death from heart or lung diseases in the elderly.

Level of Significance Before Mitigation

Potentially significant.

Mitigation Measures

Refer to mitigation measures AQ-1 through AQ-3.

Level of Significance After Mitigation

Less than significant. With mitigation, emissions of PM₁₀ during construction of sites within the MDAQMD would not exceed the regional significance thresholds. Therefore, the project would not be associated with a cumulatively considerable contribution to PM₁₀ and would not be associated with cumulative health risks.

Sensitive Receptors

Impact 4.3-6 **The project would expose sensitive receptors to substantial pollutant concentrations.**
[CEQA Air Quality Threshold 3(d)]

Impact Analysis

Construction

The localized construction analysis uses thresholds that represent the maximum emissions for a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area. The thresholds are also based on the location of the sensitive receptors. If the project results in emissions under those thresholds, it follows that the project would not cause or contribute to an exceedance of the standard. If the standards are not exceeded at the sensitive receptor locations, it follows that the receptors would not be exposed to substantial pollutant concentrations.

The localized construction analysis demonstrated that the sites located in the SCAQMD jurisdiction would not exceed the localized thresholds for CO, nitrogen dioxide, PM₁₀, or PM_{2.5}. However, the sites located within the MDAQMD would exceed the LSTs for PM₁₀ and PM_{2.5}. Therefore, according to this criterion, the air pollutant emissions during construction would result in a significant impact and could result in a violation of an ambient air quality standard for PM₁₀ and PM_{2.5} and expose sensitive receptors to substantial pollutant concentrations.

The construction equipment would emit diesel particulate matter, which is a carcinogen. However, the diesel particulate matter emissions are short term in nature. Determination of risk from diesel particulate matter is considered over a 70-year exposure time. Additionally, the majority of the sites are located far away from the nearest sensitive receptor. Therefore, considering the dispersion of the emissions and the short time frame, exposure to diesel particulate matter is anticipated to be less than significant.

Operation

The CARB Air Quality and Land Use Handbook contains recommendations that are intended to protect California's children and other vulnerable populations from nearby land uses associated with substantial air pollutants. Some of the land uses includes freeways, urban roads, distribution centers, fueling stations, and dry cleaners. The project is not one of the land uses contemplated by the CARB as associated with substantial air pollutants.

The onsite operational generators are propane; the exhaust emissions are not associated with substantial health risks. The Santa Rosa Peak site uses diesel fuel in its generator. Diesel exhaust contains known carcinogens. However, the Santa Rosa Peak site is located at least five miles from a sensitive receptor. At that distance, the concentrations of diesel particulate matter would not expose sensitive receptors to substantial pollutant concentrations.

Any additional sites that may require full time generators may be diesel or propane. Because any future sites are not known at this time, this potential impact could be significant based on the location of the generator, its use, and the type of fuel. Therefore, mitigation is suggested to reduce any potential future impacts.

Level of Significance Before Mitigation

Significant.

Mitigation Measures

Refer to mitigation measures AQ-1, AQ-2, and AQ-3. AQ-5 is also required.

AQ-5 Any additional full time generators (besides the existing Santa Rosa Peak site) shall be propane fueled.

Level of Significance After Mitigation

Less than significant.

Odors

Impact 4.3-7	The project would not create objectionable odors affecting a substantial number of people. [CEQA Air Quality Threshold 3(e)]
---------------------	---

Impact Analysis

Land uses typically considered to be associated with odors include wastewater treatment facilities, waste-disposal facilities, or agricultural operations. The proposed project does not contain land uses typically associated with emitting objectionable odors. Diesel exhaust will be emitted during construction of the project, which is objectionable to some; however, emissions will disperse rapidly from the project site and therefore should not be at a level to induce a negative response.

Level of Significance Before Mitigation

Less than significant.