

5.5.1 OVERVIEW AND SUMMARY

*This section evaluates potential air quality impacts associated with construction and operation of the proposed Master Plan Update and identifies mitigation measures to reduce those potential impacts. Sources utilized in this discussion include information provided by the Santa Barbara County Air Pollution Control District (SBCAPCD) and air quality data from the California Air Resources Board (CARB). Air pollutant emission calculations conducted for the project are contained within **Appendix 5.5** of this Environmental Impact Report (EIR).*

Construction and operation of the project would result in criteria air pollutant emissions primarily from heavy-duty construction equipment and motor vehicles. Stationary source emergency generators would also result in emissions during routine maintenance and testing. Construction and operation of the project would result in emissions that are less than the thresholds of significance recommended by the SBCAPCD. However, even if construction emissions would be less than the thresholds of significance, the SBCAPCD requires that projects implement construction mitigation measures. The construction mitigation measures would reduce construction emissions and would ensure project consistency with General Plan policies to reduce emissions. Impacts for construction-related activities would be less than significant with mitigation (Class II), while impacts for all other activities would be less than significant (Class III).

5.5.2 DATA SOURCES AND METHODOLOGY

The SBCAPCD provides methodologies for evaluating the significance of construction and operational emissions from projects. The methodologies are described in the SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents*.¹ The SBCAPCD thresholds of significance apply to all sources of air pollutants, including equipment and businesses not regulated by the SBCAPCD and motor vehicles. Emissions modeling were conducted using the California Emissions Estimator Model (CalEEMod) and information provided in the CalEEMod User's Guide.² CalEEMod is a program that calculates air pollutant emissions from land use sources and incorporates the CARB's EMFAC2007 model for on-road vehicle emissions and CARB's OFFROAD2007 model for off-road vehicle emissions. The model also incorporates factors specific to air basins in California, such as reactive organic gas (ROG) content in architectural coating and vehicle fleet mixes. Air quality impacts are also projected based on information and estimated activity levels of project construction and operation. The potential for the

¹ Santa Barbara County Air Pollution Control District, *Scope and Content of Air Quality Sections in Environmental Documents*, (2010). The document may be downloaded from the following website: <http://www.sbapcd.org/apcd/landuse.htm#Scope-Content>.

² South Coast Air Quality Management District, *California Emissions Estimator Model User's Guide*, (2011). The model and User's Guide may be downloaded from the following website: <http://www.caleemod.com>.

project to cause health impacts is assessed in accordance with land use planning recommendations described in CARB's *Air Quality and Land Use Handbook*.³ The purpose of the *Air Quality and Land Use Handbook* is to provide information that will help keep vulnerable populations out of harm's way with respect to nearby sources of air pollution. Other sources of information are provided as footnote citations where applicable.

5.5.3 APPLICABLE REGULATIONS

5.5.3.1 Federal Regulations

The United States Environmental Protection Agency (US EPA) is responsible for enforcing the federal Clean Air Act and the National Ambient Air Quality Standards (NAAQS). The US EPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The US EPA also maintains jurisdiction over emissions sources outside state waters (outer continental shelf), and establishes national emissions standards for vehicles. As part of its enforcement responsibilities, the US EPA requires each state with areas that do not meet the NAAQS to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the period identified in the SIP. The US EPA formally classifies air basins as attainment or nonattainment based on whether the region meets or exceeds the NAAQS. The US EPA makes area designations for seven criteria pollutants: ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and lead. The status of the South Central Coast Air Basin (Air Basin) with respect to attainment with the NAAQS is summarized in **Table 5.5-1, Attainment Status – South Central Coast Air Basin (Santa Barbara County)**.

In response to rapid population growth and the associated rise in motor vehicle operations, the 1990 Clean Air Act Amendments addressed tailpipe emissions from automobiles, heavy-duty engines, and diesel fuel engines. The amendments established more stringent standards for hydrocarbons, nitrogen oxides (NO_x), and CO emissions in order to reduce the levels of these pollutants in heavily populated areas. Under the 1990 Clean Air Act Amendments, new fuels were required to be less volatile, contain less sulfur (regarding diesel fuel), and have higher levels of oxygenates (oxygen-containing substances to improve fuel combustion). The US EPA also has regulatory and enforcement jurisdiction over emission sources beyond state waters (outer continental shelf), and those that are under the exclusive authority of the federal government, such as aircraft, locomotives, and interstate trucking. Due

³ California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*, (2005). The document may be downloaded from the following website: <http://www.arb.ca.gov/ch/landuse.htm>.

to the lack of a substantial reduction in hazardous emissions under the 1977 Clean Air Act, the 1990 Clean Air Act Amendments include regulations for reducing impacts from 189 listed hazardous air pollutants (HAPs), which are carcinogenic, mutagenic, and/or reproductive toxicants. The 1990 Clean Air Act Amendments also affects major stationary sources and area emissions sources requiring use of Maximum Achievable Control Technology (MACT) to reduce HAP emissions and their associated health impacts.

**Table 5.5-1
Attainment Status – South Central Coast Air Basin (Santa Barbara County)**

Pollutant	Federal	State
Ozone (O ₃)	Attainment/Unclassified (Maintenance [1 hour])	Nonattainment (Moderate [1 hour])
Nitrogen Dioxide (NO ₂)	Attainment/Unclassified	Attainment
Carbon Monoxide (CO)	Attainment/Unclassified	Attainment
Sulfur Dioxide (SO ₂)	Attainment/Unclassified	Attainment
Respirable Particulates (PM ₁₀)	Unclassified	Nonattainment
Fine Particulates (PM _{2.5})	Attainment/Unclassified	Unclassified
Lead (Pb)	Unclassified	Attainment
Sulfates (SO ₄)	—	Attainment
Hydrogen Sulfide (H ₂ S)	—	Attainment
Vinyl Chloride	—	Unclassified
Visibility-Reducing Particles	—	Unclassified

Sources:

California Air Resources Board, "Area Designations Maps/State and National," <http://www.arb.ca.gov/degis/adm/adm.htm>. 2011.

US Environmental Protection Agency, "Air Quality Maps," <http://www.epa.gov/region9/air/maps/index.html>. 2011.

5.5.3.2 State Regulations

CARB is a branch of the California Environmental Protection Agency (Cal/EPA) that oversees air quality planning and control throughout California. It is primarily responsible for ensuring the implementation of the California Clean Air Act (CCAA), responding to federal Clean Air Act requirements, and regulating emissions from motor vehicles and consumer products within the state. In addition, CARB also sets health-based air quality standards and control measures for toxic air contaminants (TACs). However, the focus of most of the board's research goes toward automobile emissions, as they are the largest contributor to air pollution in California. CARB establishes new standards for vehicles sold in California and for various types of equipment available commercially. CARB also sets vehicle fuel specifications to reduce vehicular emissions.

The CCAA established a legal mandate for air basins to achieve the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. Health and Safety Code Section 39607(e) requires

CARB to establish and periodically review area designation criteria. These designation criteria provide the basis for CARB to designate areas of the state as attainment, nonattainment, or unclassified according to state standards. CARB makes area designations for 10 criteria pollutants: O₃, CO, NO₂, SO₂, PM₁₀, PM_{2.5}, sulfates, lead, hydrogen sulfide, and visibility-reducing particles.⁴ The status of the Air Basin with respect to attainment with the CAAQS is summarized in **Table 5.5-1**.

5.5.3.3 Local Regulations

Santa Barbara County

Air Pollution Control District

The SBCAPCD has jurisdiction over the County of Santa Barbara for air quality planning. The County is part of the South Central Coast Air Basin, which consists of Ventura, San Luis Obispo, and Santa Barbara Counties. An air basin is a land area with similar meteorological and geographic conditions. To the extent possible, air basins include both the air pollutant source and immediate downwind receptor areas. The SBCAPCD is responsible for bringing air quality in the County into attainment of the federal and state air quality standards. Specifically, the SBCAPCD is responsible for monitoring ambient air pollutant levels throughout the County and for developing and implementing attainment strategies to ensure that future emissions will be within federal and state standards.

The SBCAPCD primarily regulates emissions from stationary sources such as manufacturing and power generation. Mobile sources such as buses, automotive vehicles, trains, and airplanes are largely out of the SBCAPCD's jurisdiction and are up to CARB and the US EPA to regulate. In order to achieve the air quality standards, the SBCAPCD adopts a Clean Air Plan that serves as a guideline to bring pollutant concentrations into attainment with federal and state standards. The SBCAPCD determines if certain rules and control measures are appropriate for their specific region according to technical feasibility, cost effectiveness, and the severity of nonattainment. Once the SBCAPCD has adopted the proper rules, control measures, and permit programs, it is responsible to implement and enforce compliance with those rules, control measures, and programs.

⁴ California Air Resources Board, "Area Designations (Activities and Maps)," <http://www.arb.ca.gov/desig/desig.htm>. 2010. According to California Health and Safety Code, Section 39608, "state board, in consultation with the districts, shall identify, pursuant to subdivision (e) of Section 39607, and classify each air basin which is in attainment and each air basin which is in nonattainment for any state ambient air quality standard." Section 39607(e) states that the State shall "establish and periodically review criteria for designating an air basin attainment or nonattainment for any state ambient air quality standard set forth in Section 70200 of Title 17 of the California Code of Regulations. California Code of Regulations, Title 17, Section 70200 does not include vinyl chloride; therefore, CARB does not make area designations for vinyl chloride.

Rules and Regulations

The SBCAPCD has the primary responsibility under the California Health and Safety Code for controlling air pollution from stationary sources in order to protect the public health. This responsibility includes the authority to develop, adopt, and enforce rules. Specific rules and regulations have been adopted by the SBCAPCD Board limiting the emissions that can be generated by various stationary uses and activities, and identifying specific pollution reduction measures that must be implemented in association with various stationary uses. These rules regulate the emissions of the six criteria air pollutants, as well as toxic emissions and nuisance odors. They are also subject to ongoing refinement by the SBCAPCD. A description of several of the rules that may apply to the proposed Master Plan Update is provided below:

- **Rule 302 (Visible Emissions):** This rule generally prohibits the discharge into the atmosphere from any single source of emission any air contaminants of such opacity that would obstruct the view or visibility of an observer.
- **Rule 303 (Nuisance):** This rule prohibits any person from discharging air contaminants or any other material that would cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or which endangers the comfort, repose, health, or safety or any such persons or the public.
- **Rule 345 (Fugitive Dust from Construction and Demolition):** This rule includes requirements for fugitive dust emissions beyond the property line and requires generators to implement control measures to limit the amount of dust from truck hauling, vehicle track-out, and demolition activities.
- **Rule 201/202 (Permit Required/Exemptions to Rule 201):** Rule 201 includes permit requirements for article, machine, equipment, or other contrivance which may cause the issuance of air contaminants. Rule 202 specifies that stationary compression-ignition engines (e.g., diesel-fueled engines) with a rated brake horsepower of less than 50 are exempt from Rule 201. Therefore, project-related compressions-ignition (e.g., diesel) engines with a rated brake horsepower of 50 or more would generally be subject to SBCAPCD permitting requirements.

Clean Air Plan

The SBCAPCD is required to produce plans describing how air quality will be improved. The CCAA requires that these plans be updated in order to incorporate the most recent available technical information. In addition, the US EPA requires that transportation conformity budgets be established based on the most recent planning assumptions. Plan updates are necessary to ensure continued progress toward attainment and to avoid a transportation conformity lapse and associated federal funding losses. A multi-level partnership of governmental agencies at the federal, state, regional, and local levels implement the programs contained in these plans. Agencies involved include the US EPA, CARB, local governments, the Santa Barbara County Association of Governments (SBCAG), and the SBCAPCD.

The SBCAPCD adopted the 2010 Clean Air Plan in January 2011,⁵ which is an update to the previous 2007 Clean Air Plan. The overall strategy for control of both reactive organic compounds and oxides of nitrogen adopted in the 2007 Clean Air Plan continues in the 2010 Plan. However, the 2010 Clean Air Plan includes revisions to stationary emission control measures based on the SBCAPCD's updated feasibility analysis. The 2007 Clean Air Plan and has been approved by CARB and is the "applicable regional plan" to use under CEQA for assessing plan consistency. The 2001 Clean Air Plan has been approved by both CARB and the US EPA and remains in effect for federal standards.

The purpose of the 2010 and 2007 Clean Air Plans is to address CCAA mandates under Health and Safety Code Sections 40924 and 40925 that require that every three years areas update their clean air plans to attain the state 1-hour ozone standard. Key requirements of the CCAA addressed in the Clean Air Plans include demonstration of an annual 5 percent emission reduction of ozone precursors, or, if this cannot be done, inclusion of every feasible measure as part of the emission controls strategy. State law also requires that Clean Air Plans provide for attainment of the state ambient air quality standards at the earliest practical date (Health and Safety Code Section 40910). The Clean Air Plans continue the overall strategy for control of both ROC and NO_x emissions adopted in the 2004 Clean Air Plan with the addition of eight new or revised stationary source control measures, revised feasibility analysis for controls, and updated transportation control measures.

CEQA Air Quality Guidelines

In November 2000, the SBCAPCD published its latest *Environmental Review Guidelines for the Santa Barbara County Air Pollution Control District*⁶ as a guidance document to provide lead agencies, consultants, and project proponents with uniform *procedures* for assessing air quality impacts and preparing the air quality sections of environmental documents for projects subject to CEQA. This document describes the criteria that the SBCAPCD uses when reviewing and commenting on the adequacy of environmental documents, such as this EIR. It recommends thresholds for use in determining whether projects would have significant adverse environmental impacts and describes the SBCAPCD's procedures for review of environmental documents.

In July of 2008, the SBCAPCD published its latest version of the guidance document titled *Scope and Content of Air Quality Sections in Environmental Documents*.⁷ This document contains guidance on

⁵ Santa Barbara County Air Pollution Control District, 2010 Clean Air Plan – Final January 2011, adopted January 20, 2011.

⁶ Ibid, Environmental Review Guidelines for the County of Santa Barbara, adopted October 1995, revised November 2000.

⁷ Ibid, Scope and Content of Air Quality Sections, update December 2011.

assessing and mitigating air quality impacts. It includes an outline of the elements needed in EIRs, environmental setting information for Santa Barbara County, significance thresholds for project and cumulative impacts, County-specific instructions for air quality modeling, and a list of potential mitigation measures. This EIR section was prepared following the recommendations of the *Environmental Review Guidelines* and *Scope and Content of Air Quality Sections in Environmental Documents*.

Santa Barbara County Association of Governments

The Santa Barbara County Association of Governments (SBCAG) is a regional planning agency for the County and the eight incorporated cities within the County. As a regional planning agency, SBCAG serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Although SBCAG is not an air quality management agency, it is responsible for several air quality planning issues. Specifically, as the designated Metropolitan Planning Organization (MPO) for the County, it is responsible for providing population, employment, travel, and congestion projections for regional air quality planning efforts and for determining conformity with the applicable air quality management plan, pursuant to Section 176(c) of the 1990 Clean Air Act Amendments. It is required to quantify and document the demographic and employment factors influencing expected transportation demand, including land use forecasts. Pursuant to *California Health and Safety Code* Section 40460(b), SBCAG is also responsible for preparing and approving portions of the County's air quality management plans relating to demographic projections, and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. The most recent population, housing, and transportation measures and strategies contained in the *2009 Regional Transportation Plan* are incorporated into the current SBCAPCD Clean Air Plan.

City of Solvang

General Plan

The City's General Plan sets forth the City's goals and policies for development. The *Conservation and Open Space Element* sets forth the City's goals and policies with respect to air quality.⁸ The following goals, policies, and actions from the General Plan are relevant to air pollutant emissions from the proposed Master Plan Update:

Goal 3.1 To protect and conserve the City's natural and cultural resources.

⁸ City of Solvang, General Plan, Conservation and Open Space Element, 1988.

Objective 6.0 Reduce the City's demands upon conventional, non-renewable sources of energy.

Policy 6.a The City shall require new development to incorporate alternative energy systems.

5.5.4 EXISTING CONDITIONS

Climate and Meteorology

Southern California lies in a semi-permanent high-pressure zone of the Eastern Pacific region. The Mediterranean-type climate of Santa Barbara County, as with all of Southern California, is regulated by the strength and location of the semi-permanent high-pressure center over the Pacific Ocean and the moderating effect of the nearby oceanic heat reservoir. Local climate conditions are characterized by dry, warm summers; mild, wet winters; infrequent rainfall; moderate daytime onshore breezes; and relatively low humidity. Summertime weather is dominated by the movement and intensity of the semi-permanent high-pressure system that is normally centered several hundred miles southwest of California. In the spring, summer, and fall, the climate is heavily influenced by marine air. Light winds in the region allow marine air to regulate temperatures and airflow during these periods. In the winter, low-pressure weather systems originating in the northern Pacific Ocean bring clouds, wind, and rain into Southern California. Santa Ana winds, caused by high pressure in the high plateau region northeast of California, occur intermittently during winter and fall.

The Southern California area has been divided into several geographical air basins. The County of Santa Barbara is located within the South Central Coast Air Basin, which comprises Ventura, Santa Barbara, and San Luis Obispo Counties. The City experiences a mild, Mediterranean climate typical of Santa Barbara County. Average high temperatures in the area range from about 65 to 91 degrees Fahrenheit and average low temperatures range from about 39 to 52 degrees Fahrenheit. Precipitation averages 21 inches per year, with the majority of rainfall occurring from November through April.⁹ Prevailing winds in Santa Barbara County are from the west-southwest.

Regional Air Quality Setting

Air emissions are generated by a variety of sources in Santa Barbara County. Motor vehicles traveling along local roadways are a major source. Stationary and area-wide sources also contribute to air emissions in the region.

⁹ Western Regional Climate Center, "Cachuma Lake, California (Station 041253)," <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca1253>. 2011.

The topography and climate of Santa Barbara County combine to make it an area of smog potential. Subsistence inversions occur frequently at approximately 1,000 to 2,000 feet above mean sea level in Santa Barbara County, and are most persistent during the summer. Surface temperature inversions occur when a warm air mass descends over a lower, cooler, moist marine air layer. The warm upper layer forms a cap over the marine layer and inhibits the air pollutants generated near the ground from dispersing upward. In the winter, cool ground temperatures and very light winds can cause extremely low surface temperature inversions and air stagnation, trapping pollutants during the late night and early morning hours. Concentrating volumes of pollutants via subsistence or surface temperature inversions allows the sunlight to generate high levels of photochemical smog.

The determination of whether a region's air quality is healthful or unhealthful is made by comparing contaminant levels in ambient air samples to national and state standards. California and the US EPA have established health-based air quality standards for the following criteria air pollutants: O₃, NO₂, CO, SO₂, PM₁₀, PM_{2.5}, and lead. These standards were established to protect sensitive receptors with a margin of safety from adverse health impacts due to exposure to air pollution. The California standards are more stringent than the federal standards, and in the case of PM₁₀ and SO₂, much more stringent. California has also established standards for sulfates, visibility-reducing particles, hydrogen sulfide, and vinyl chloride. The state and national ambient air quality standards for each of the monitored pollutants and their effects on health are summarized in **Table 5.5-2, Ambient Air Quality Standards**.

Generally, the sources for hydrogen sulfide emissions include decomposition of human and animal wastes and industrial activities, such as food processing, coke ovens, kraft paper mills, tanneries, and petroleum refineries. There are no such uses or sources associated with the proposed Master Plan Update. Similarly, the sources for vinyl chloride emissions include manufacturing of plastic products, hazardous waste sites, and landfills; and there are no such uses or sources associated with the proposed Master Plan Update. As a result, there is no need for any further evaluation of the hydrogen sulfide or vinyl chloride emissions associated with this project. Motor vehicles and paints used to be a source of lead; however, unleaded fuel and unleaded paints have virtually eliminated lead emissions from most development projects. As a result, there is no need for any further evaluation of lead emissions with respect to the proposed Master Plan Update.

Local Air Quality Setting

To identify ambient concentrations of the criteria pollutants, the SBCAPCD operates air quality monitoring stations throughout the County. The monitoring station most representative of the project area is located at the Santa Ynez Airport and monitors O₃. A summary of the monitored values for O₃ for

the past three years is presented in **Table 5.5-3, Local Ambient Ozone Concentrations**. The values show that the area has registered values above state and/or federal standards for O₃.

**Table 5.5-2
Ambient Air Quality Standards**

Air Pollutant	Concentration/Averaging Time		Most Relevant Health Effects
	State Standard (CAAQS)	Federal Primary Standard (NAAQS)	
Ozone	0.09 ppm, 1-hr. avg. 0.070 ppm, 8-hr avg.	0.075 ppm, 8-hr avg. (3-year average of annual 4 th -highest daily maximum)	(a) Pulmonary function decrements 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; and (f) Property damage
Nitrogen Dioxide	0.18 ppm, 1-hr avg. 0.030 ppm, annual arithmetic mean	0.100 ppm, 1-hr avg. (3-year avg. of the 98 th percentile of the daily maximum 1-hour avg.) 0.053 ppm, annual arithmetic mean	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extrapulmonary biochemical and cellular changes and pulmonary structural changes; and (c) Contribution to atmospheric discoloration
Carbon Monoxide	20 ppm, 1-hr avg. 9.0 ppm, 8-hr avg.	35 ppm, 1-hr avg. (not to be exceeded more than once per year) 9 ppm, 8-hr avg. (not to be exceeded more than once per year)	(a) Aggravation of angina pectoris 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; and (d) Possible increased risk to fetuses
Sulfur Dioxide	0.25 ppm, 1-hr. avg. 0.04 ppm, 24-hr avg.	0.075 ppm, 1-hr avg. (3-year avg. of the 99 th percentile)	Bronchoconstriction accompanied by symptoms, which may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in person with asthma
Respirable Particulate Matter (PM10)	50 µg/m ³ , 24-hr avg. 20 µg/m ³ , annual arithmetic mean	150 µg/m ³ , 24-hr avg. (not to be exceeded more than once per year on average over 3 years)	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Decline in pulmonary function growth in children; and (c) Increased risk of premature death from heart or lung diseases in the elderly
Fine Particulate Matter (PM2.5)	12 µg/m ³ , annual arithmetic mean	35 µg/m ³ , 24-hr avg. (3-year average of 98 th percentile) 15 µg/m ³ , annual arithmetic mean (3-year average)	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature death from heart or lung diseases in the elderly
Lead	1.5 µg/m ³ , 30-day avg.	1.5 µg/m ³ , calendar quarter 0.15 µg/m ³ , 3-month rolling average	(a) Increased body burden, and (b) Impairment of blood formation and nerve conduction

Air Pollutant	Concentration/Averaging Time		Most Relevant Health Effects
	State Standard (CAAQS)	Federal Primary Standard (NAAQS)	
Visibility-Reducing Particles	Reduction of visual range to less than 10 miles at relative humidity less than 70%, 8-hour avg. (10 AM–6 PM)	None	Visibility impairment on days when relative humidity is less than 70 percent.
Sulfates	25 µg/m ³ , 24-hr avg.	None	(a) Decrease in ventilatory function, (b) Aggravation of asthmatic symptoms, (c) Aggravation of cardiopulmonary disease, (d) Vegetation damage, (e) Degradation of visibility, and (f) Property damage
Hydrogen Sulfide	0.03 ppm, 1-hr avg.	None	Odor annoyance
Vinyl Chloride	0.01 ppm, 24-hr avg.	None	Known carcinogen

Source: South Coast Air Quality Management District, Final Program Environmental Impact Report for the 2007 Air Quality Management Plan, (2007) Table 3.1-1, p. 3.1-3.

µg/m³ = microgram per cubic meter.

ppm = parts per million by volume.

**Table 5.5-3
Local Ambient Ozone Concentrations**

Pollutant	Standards ¹	Year		
		2008	2009	2010
OZONE (O₃)				
Maximum 1-hour concentration monitored (ppm)		0.087	0.080	0.089
Maximum 8-hour concentration monitored (ppm)		0.079	0.067	0.081
Number of days exceeding state 1-hour standard	0.09 ppm	0	0	0
Number of days exceeding state 8-hour standard	0.070 ppm	3	0	1
Number of days exceeding federal 8-hour standard	0.075 ppm	1	0	1

Source: California Air Resources Board, "Air Quality Data Statistics," <http://www.arb.ca.gov/adam/>. 2011.

¹ Parts by volume per million of air (ppm), micrograms per cubic meter of air (µg/m³), or annual arithmetic mean (aam).

5.5.5 THRESHOLDS OF SIGNIFICANCE

In order to assist in determining whether a project would have a significant effect on the environment, the *California Environmental Quality Act (CEQA) Guidelines* identify criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions.

Specifically, Appendix G of the *State CEQA Guidelines* (Environmental Checklist Form) lists the following threshold, under which a project may be deemed to have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of applicable air quality plans;

- Violate any air quality standards or contribute substantially to an existing or projected air quality violation;
- Cause cumulatively considerable net increases of any criteria pollutant for which an affected region is in non-attainment under applicable federal or state ambient air quality standards; or
- Expose sensitive receptors to substantial pollutant concentrations.

The SBCAPCD has not adopted quantitative thresholds of significance for short-term construction emissions. However, SBCAPCD Rule 202 D.16 states that if the combined emissions from all construction equipment used to construct a stationary source that requires an Authority to Construct permit have the potential to exceed 25 tons of any pollutant, except CO, in a 12-month period, the owner of the stationary source shall provide offsets under the provisions of SBCAPCD Rule 804 (Emission Offsets) and shall demonstrate that no ambient air quality standard will be violated. Based on this limit, construction of the project would have a significant impact on air quality if it would:

- Emit from all construction sources, both stationary and mobile, greater than 25 tons for all assessed pollutants, except CO, in a 12 month period.

The SBCAPCD has adopted the following thresholds of significance for long-term operational emissions. Operation of the project would have a significant impact on air quality if it would:

- Not be consistent with the latest adopted federal and state air quality plans for Santa Barbara County;
- Emit (from all project sources, both stationary and mobile) greater than the daily trigger for offsets or Air Quality Impact Analysis set in the SBCAPCD New Source Review Rule, for any pollutant (e.g., 240 pounds per day for ROC or NO_x; and 80 lbs/day for PM₁₀). There is no daily operational threshold for CO; it is an attainment pollutant;
- Emit greater than 25 pounds per day of NO_x or ROC from motor vehicle trips only;
- Cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone); and
- Exceed the SBCAPCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million for cancer risk and a Hazard Index of more than one for non-cancer risk).

Cumulative impacts and consistency with the policies and measures should be discussed for all projects (e.g., whether the project exceeds the growth assumptions in the air quality plan). Quantitative thresholds of significance are not currently in place for short-term or construction emissions; however, the SBCAPCD uses 25 tons per year for ROC or NO_x as a guideline for determining the significance of construction impacts.

5.5.6 ENVIRONMENTAL IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant with mitigation incorporated, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP that made a reasonable argument that the issue was potentially significant (see Responses to NOP, **Appendix 2.0**).

5.5.6.1 Conflict with or obstruct implementation of applicable air quality plans.

Impacts

Construction

The proposed Master Plan Update is considered a public infrastructure improvement project that would serve existing and future water needs throughout the City. Commercial and industrial projects are considered to be consistent with the Clean Air Plan if they are consistent with SBCAPCD rules and regulations.

Construction that would occur as a result of the proposed Master Plan Update would adhere to and comply with applicable SBCAPCD rules and regulations, including fugitive dust requirements. Therefore, the project would be consistent with the Clean Air Plan policies and SBCAPCD rules and regulations. Construction impacts would be less than significant.

Operation

The proposed Master Plan Update is considered a public infrastructure improvement project that would serve existing and future water needs throughout the City. According to the SBCAPCD, consistency with land use and population forecasts in local and regional plans, including the Clean Air Plan, is required under CEQA for all projects. Consistency with the Clean Air Plan means that direct and indirect emissions associated with the project are accounted for in the emissions growth assumptions and the project is consistent with applicable policies. In addition, commercial and industrial projects are considered to be consistent with the Clean Air Plan if they are consistent with SBCAPCD rules and regulations.

The proposed Master Plan Update would have no impact on the land use and population forecasts for the City. The project's operational emissions, discussed later in this section, would be below the SBCAPCD thresholds of significance. Furthermore, the project would adhere to and comply with applicable

SBCAPCD rules and regulations, including permitting requirements for emergency generators. Therefore, the project would be consistent with the land use and population forecasts used in the most recent Clean Air Plan, and would be consistent with Clean Air Plan policies and SBCAPCD rules and regulations. Operational impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant (Class III).

5.5.6.2 Violate any air quality standards or contribute substantially to an existing or projected air quality violation.

Impacts

Construction

Master Plan Update

The Master Plan Update recommends that the City provide infrastructure improvements to the water system. These improvements include installation of new wells to meet demand, water treatment facilities, and implementing an annual waterline, fire hydrant, and valve replacement program to replace aging infrastructure. The Master Plan Update also makes several recommendations for inspecting and replacing undersized waterlines and fire hydrants and valves over 50 years old (or those known to be malfunctioning). The Master Plan Update recommends the City construct additional storage of approximately 400,000 gallons in Zone 1 within the next 10 years or prior to any significant new development and recommendations for other water storage improvements.

These recommendations and improvements are described in detail in **Section 2.0, Project Description**.

Proposed Wells

The Master Plan Update recommends that the City install new wells in Well Sites A and B downstream of Alisal Bridge along the Santa Ynez River in order to withdraw 1,980 acre-feet per year (afy) at a maximum extraction rate of up to 5 cubic feet per second (cfs) from the river underflow. Previous studies indicated that up to six new wells along the Santa Ynez River would be required to meet the forecast demand. Construction of the wells will require access by construction equipment, trucks, and a drilling

rig. Access to the new wells would be provided by existing roadways along the north side of the river channel. Existing dirt roads on the floodplain would also be used to access wells. At each well site, an approximate 2,500-square-foot area (about 50 by 50 feet) will be cleared and graded to a flat surface. Individual wells will be installed within these areas, which will also be used for the drilling rig, stockpiling, and other equipment parking. It may also be necessary for construction trucks to temporarily park along the existing dirt roads at each well site.

After well development is complete, each well will be subject to up to 1 to 2 days of pump testing, which would occur on a 24-hour basis. A portable diesel engine and generator will power the well pumps. Pumped groundwater will be discharged to open areas in the floodplain near the well site in such a manner as to avoid erosion.

Well drilling, completion, development, and testing will require about 5 days at each well site. Work will likely be coordinated so that one well is being drilled while another is being developed and tested. Pump testing will occur immediately after well installation. The water lines and electrical conduits will be installed after well testing. The proposed well installation will be completed in a phased approach.

Water Treatment Plant

The City has determined that the most cost effective and reliable treatment technology is a conventional surface water treatment plant. The treatment plant would not normally be occupied, but would be visited a few hours each day by City operations personnel. Construction of the treatment plant will occur in the following phases:

1. Grading and construction of foundation and retaining wall, if necessary on the east side of the building site;
2. Building construction;
3. Utility connections, including electricity, cable, sewer, and the water line from the proposed future wells downstream of Alisal Bridge; and
4. Installation of the treatment modules.

Construction activities are expected to be completed in a nine month period. The initial grading will involve the use of a loader and backhoe for several days, followed by concrete trucks. Building construction and system installation will involve various work trucks and construction worker vehicles.

Construction Air Pollutant Emissions Summary

Construction activity that would result from the recommendations in the Master Plan Update would result in short-term emissions – that is, the emissions would not be ongoing but would only occur during

construction activity. Construction emissions would primarily result from the combustion of fossil fuels from heavy-duty construction equipment and from construction worker trucks and vehicles. The CalEEMod model was used to estimate the construction-related emissions assuming that all the activities described above are undertaken. The types of construction equipment for each of the activities described above are shown in **Table 5.5-4, Summary of Construction Equipment**.

**Table 5.5-4
Summary of Construction Equipment**

Construction Activity	Equipment Type
Infrastructure: Waterline, Fire Hydrant/Valve Replacement	Trencher, Loader/Backhoe, Concrete Trucks, Concrete/Industrial Saw, Generator, Welder, Worker Trucks/Vehicles
Infrastructure: Additional Water Storage	Loader/Backhoe, Dozer, Concrete Trucks, Generator, Worker Trucks/Vehicles
Well Drilling, Installation, and Testing	Drill Rig, Trencher, Loader/Backhoe, Welder, Generator, Concrete Trucks, Worker Trucks/Vehicles
Water Treatment Plant	Loader/Backhoe, Forklift, Trencher, Concrete Trucks, Concrete Mixers, Welder, Generator, Paver, Roller, Air Compressor, Worker Trucks/Vehicles

Source: Impact Sciences, Inc. Construction model inputs are provided in **Appendix 5.5**.

¹ Amortized GHG emissions are calculated by dividing the total construction GHG emissions over a conservative project lifetime of 30 years.

To provide a conservative estimate of the maximum construction emissions, analysis of air quality emissions assumed that construction activities could overlap and occur simultaneously (thus providing a worst-case scenario). The infrastructure improvements and replacements could take place over several years. However, the proposed future wells and water treatment facility would likely be constructed within a one-year period. Therefore, it was assumed that construction activity associated with infrastructure improvements and replacements, well construction (up to six wells), and water treatment facility construction would overlap during a 12-month period. The emission calculations also assume the use of standard construction practices, such as dust control measures consistent with SBCAPCD Rule 345 (Fugitive Dust) and the SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents*, to minimize the generation of fugitive dust. In CalEEMod, the emission calculations take into account compliance with these fugitive dust measures by incorporating the following:

- Watering of exposed surfaces and unpaved roads at least twice daily, which is estimated to reduce fugitive dust emissions from this source (PM10 and PM2.5) by 55 percent;
- Reducing speed of construction-related vehicles on unpaved roads to less than 15 miles per hour.

SBCAPCD Rule 345 and the SBCAPCD *Scope and Content of Air Quality Sections in Environmental Documents* contain other control measures to minimize fugitive dust emissions. Although the project

includes the implementation of such measures, they are not readily selectable as options in CalEEMod. The estimated construction-related GHG emissions are provided in **Table 5.5-5, Estimated Construction Emissions**. Detailed construction model inputs and emissions calculations are provided in **Appendix 5.5**, which includes both criteria air pollutant emissions and greenhouse gas emissions.

**Table 5.5-5
Estimated Construction Emissions**

Construction Activity	Maximum Emissions in Tons per Year					
	ROC	NO _x	CO	SO _x	PM10	PM2.5
Infrastructure	1.11	7.26	4.67	0.01	7.42	0.59
Well Drilling, Installation, and Testing	0.06	0.42	0.30	0.00	0.06	0.00
Water Treatment Plant	0.38	2.72	1.67	0.00	0.17	0.14
Total Annual Emission	1.55	10.40	6.64	0.01	7.65	0.73
Threshold of Significance	25	25	—	25	25	25
Exceeds Threshold?	NO	NO	—	NO	NO	NO

Source: Impact Sciences, Inc. Emissions calculations are provided in Appendix 5.5.

As shown, construction emissions would not exceed 25 tons in a 12-month period for any assessed pollutant. Construction emissions would be less than significant. However, even if construction emissions would be less than the 25-ton threshold, the SBCAPCD requires that projects implement construction mitigation measures. Therefore, the project will be required to comply with SBCAPCD required construction mitigation measures listed below.

Operation

The Master Plan Update recommends that the City implement an annual waterline, fire hydrant, and valve replacement program, and provide additional water storage capacity. This program would result in additional vehicle trips, which would generate air pollutant emissions. The proposed future wells would also generate additional vehicle trips for maintenance purposes. The proposed water treatment plant would not normally be occupied, but would be visited a few hours each day by City operations personnel, which would also generate additional vehicle trips and emissions.

The number of vehicle trips was conservatively estimated assuming that all components of the Master Plan Update, as described in detail in **Section 2.0, Project Description**, are built out. It was assumed that the waterline, fire hydrant, and valve replacement program would generate up to 12 additional vehicle trips per day (up to four trips each for waterline, fire hydrant/valve, and the additional water storage inspection/maintenance). Similarly, up to 24 additional vehicle trips per day were assumed for the

proposed future wells (four trips for each well). It was assumed that the water treatment plant would generate 8 additional vehicle trips per day (two crews each making four trips per day). Based on these assumptions, the total number of additional trips would be 44 trips per day.

Stationary source emissions would be generated from two emergency generators that would be used to improve water supply reliability during power outages; one at the existing State Water Project (SWP) Pumping Station and one at the proposed site for the water treatment plant. The sizes of the emergency generators are unknown at this time; therefore, it was assumed that each would be 1,000 kilowatts. Emergency generators may be subject to SBCAPCD air quality permitting requirements and would be scheduled to operate during standard testing and maintenance activities, which is anticipated to be about 1 hour per week and 50 hours per year. In order to provide a conservative assessment of the project operational emissions, it was assumed that both emergency generators would undergo testing and maintenance on the same day.

A summary of the operational emissions is provided in **Table 5.5-6, Estimated Operational Emissions**. Detailed emission calculations are provided in **Appendix 5.5**. As shown, operational emissions would not exceed the thresholds for mobile source emissions or the thresholds for emissions from all sources. Operational emissions would be less than significant.

Mitigation Measures

The following mitigation measures shall be implemented:

Construction Activities

AIR-1 The construction of facilities associated with the implementation of the Master Plan Update shall comply with the following SBCAPCD construction mitigation measures to reduce emissions and fugitive dust in accordance with state law and SBCAPCD policies:

- During construction, the contractor shall use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- The contractor shall minimize the amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.

- If importation, exportation, and stockpiling of fill material is involved, the contractor shall ensure that soil stockpiled for more than two days be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.

**Table 5.5-6
Estimated Operational Emissions**

Emission Source	Emissions in Pounds per Day					
	ROC	NO _x	CO	SO _x	PM10	PM2.5
Summertime Emissions						
Mobile Sources (Infrastructure)	0.08	0.14	0.78	0.00	0.10	0.00
Mobile Sources (Wells)	0.18	0.30	1.56	0.00	0.18	0.00
Mobile Sources (Water Treatment Plant)	0.06	0.11	0.60	0.00	0.08	0.00
Mobile Sources Total	0.32	0.55	2.94	0.00	0.36	0.00
Mobile Source Thresholds	25	25	—	—	—	—
Area Sources	0.03	0.00	0.00	0.00	0.00	0.00
Emergency Generators (2)	1.89	26.61	14.75	0.03	1.88	1.88
Mobile+Area/Stationary Emissions	2.24	27.16	17.69	0.03	2.24	1.88
All Source Thresholds	240	240	—	—	80	—
Exceeds Thresholds?	NO	NO	—	—	NO	—
Wintertime Emissions						
Mobile Sources (Infrastructure)	0.09	0.15	0.83	0.00	0.10	0.00
Mobile Sources (Wells)	0.18	0.30	1.68	0.00	0.18	0.00
Mobile Sources (Water Treatment Plant)	0.07	0.12	0.63	0.00	0.08	0.00
Mobile Sources Total	0.34	0.57	3.14	0.00	0.36	0.00
Mobile Source Thresholds	25	25	—	—	—	—
Area Sources	0.03	0.00	0.00	0.00	0.00	0.00
Emergency Generators (2)	1.89	26.61	14.75	0.03	1.88	1.88
Mobile+Area/Stationary Emissions	2.26	27.18	17.89	0.03	2.24	1.88
All Source Thresholds	240	240	—	—	80	—
Exceeds Thresholds?	NO	NO	—	—	NO	—

Source: Impact Sciences, Inc. Emissions calculations are provided in *Appendix 5.5*.

Totals in table may not appear to add exactly due to rounding in the computer model calculations.

- The contractor shall install gravel pads at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving, or excavation is completed, the contractor shall treat the disturbed area by watering, revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The names and telephone numbers of such persons shall be

provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

- Prior to land use clearance, the applicant shall include, as a note on a separate informational sheet to be recorded with map, these dust control requirements. All requirements shall be shown on grading and building plans.
- The contractor shall register all portable diesel-powered construction equipment with the state's portable equipment registration program OR shall obtain an SBCAPCD permit.
- The contractor shall comply with applicable provisions of the CARB Regulation for In-use Off-road Diesel Vehicles (Title 13 California Code of Regulations, Chapter 9, Section 2449), the purpose of which is to reduce diesel particulate matter (PM) and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. For more information, please refer to the CARB website at www.arb.ca.gov/msprog/ordiesel/ordiesel.htm.
- The contractor shall comply with applicable provisions of Title 13, Section 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to 5 minutes; electric auxiliary power units should be used whenever possible.

Operational Activities

No mitigation is required.

Residual Impacts

Impacts for construction-related activities would be less than significant with mitigation (Class II), while impacts for all other activities would be less than significant (Class III).

5.5.6.3 Cause cumulatively considerable net increases of any criteria pollutant for which an affected region is in non-attainment under applicable federal or state ambient air quality standards.

Impacts

Construction

As indicated in **Table 5.5-5**, the construction emissions that would be generated from construction activities would not exceed the SBCAPCD threshold of 25 tons in a 12-month period for any assessed pollutant. Projects that do not exceed the project-level threshold would not contribute to cumulatively significant air quality impacts. However, even if construction emissions would be less than the 25-ton

threshold, the SBCAPCD requires that projects implement construction mitigation measures. Therefore, the project will be required to comply with SBCAPCD required construction mitigation measures.

Operation

As previously discussed, the proposed Master Plan Update would have no impact on the land use and population forecasts for the City. Furthermore, the project's operational emissions, as shown in **Table 5.5-6**, would be below the SBCAPCD thresholds of significance. The project would adhere to and comply with applicable SBCAPCD rules and regulations, including permitting requirements for emergency generators. Therefore, the project would be consistent with the land use and population forecasts used in the most recent Clean Air Plan, and would be consistent with Clean Air Plan policies and SBCAPCD rules and regulations. Operation of the project would result in a less than significant impact with respect to air quality.

Mitigation Measures

Construction Activities

Mitigation Measure AIR-1 shall be implemented for construction activities.

Operational Activities

No mitigation is required.

Residual Impacts

Impacts for construction-related activities would be less than significant with mitigation (Class II), while impacts for all other activities would be less than significant (Class III).

5.5.6.4 Expose sensitive receptors to substantial pollutant concentrations.

Impacts

Construction

Construction activities would likely be sporadic and would not be concentrated at a single location, but would occur at many locations throughout the City. As shown in **Table 5.5-5**, construction emissions would be well below the SBCAPCD thresholds of significance, particularly for PM_{2.5}, which is closely associated with diesel particulate matter, a known carcinogen. Construction activities at any one location would be short-term lasting up to 5 days for each well construction and nine months for the water

treatment plant construction. Infrastructure improvements and replacements could last several years; however, each individual improvement or replacement would involve construction activity over a much shorter timeframe and would result in localized emissions less than the values shown in **Table 5.5-5**, which are already well below the SBCAPCD thresholds of significance. However, even if construction emissions would be less than the 25-ton threshold, the SBCAPCD requires that projects implement construction mitigation measures. Therefore, the project will be required to comply with SBCAPCD required construction mitigation measures.

Operation

Operation of the project components under full buildout of the Master Plan Update would not result in substantial pollutant concentrations that would affect sensitive receptors. Operational emissions would be generated from vehicle trips associated with standard operation and maintenance activities. As previously discussed, emissions from these sources would be substantially below the SBCAPCD thresholds of significance. Maintenance trucks may be diesel powered, which would result in small amounts of diesel particulate matter. These emissions would be negligible, as shown in **Table 5.5-6**. In addition, ambient CO concentrations in the County are well below the ambient air quality standards and the additional vehicle trips associated with standard operation and maintenance activities would not cause or contribute to the formation of CO hotspots that would exceed the standards.

The project would include an emergency generator at the proposed water treatment plant. The Master Plan Update also recommends the installation of an emergency generator at the SWP Pumping Station to improve water supply reliability during power outages. As previously discussed in **Subsection 5.5.3.3, Local Regulations**, diesel-fueled emergency generators with a rated brake horsepower of 50 or more would be subject to SBCAPCD air quality permitting requirements. Emergency generators would be scheduled to operate during standard testing and maintenance activities, which is anticipated to be about 1 hour per week and 50 hours per year. Diesel particulate matter emissions from the emergency generators would be negligible, as shown in **Table 5.5-6**, and would only occur for about 1 hour in a week. Therefore, diesel particulate matter emissions would not cause an exceedance of the health-based cancer risk threshold of 10 in a million or a hazard index of 1.0.

The proposed water treatment plant would utilize a coagulant, such as aluminum sulfate, and liquid sodium hypochlorite for disinfection. The plant would be constructed in the City's Alisal Commons open space, between Alisal Road and the Alisal Glen housing subdivision (see **Figure 2.0-9, Proposed Water Treatment Plant Location**). The treatment plant site would be approximately 150 feet by 200 feet, and surrounded by a 7-foot-high decorative block wall. The Office of Environmental Health Hazard Assessment (OEHHA) has not identified aluminum sulfate or sodium hypochlorite as toxic air

contaminants with acute, chronic, or cancer risks (chlorine is identified as a toxic air contaminant with acute and chronic risks). The liquid sodium hypochlorite would be stored at the water treatment plant in an unpressurized 1,000-gallon tank of double-wall high-density polyethylene (HDPE) and the disinfection process would occur in a closed process and would not result in emissions to the atmosphere. As a result, impacts from project operational emissions to sensitive receptors would be less than significant.

Mitigation Measures

Construction Activities

Mitigation Measure AIR-1 shall be implemented for construction activities.

Operational Activities

No mitigation is required.

Residual Impacts

Impacts for construction-related activities would be less than significant with mitigation (Class II), while impacts for all other activities would be less than significant (Class III).

5.5.7 CUMULATIVE ANALYSIS

5.5.7.1 Cumulative Impacts

As indicated in **Table 5.5-5** and **Table 5.5-6**, construction and operation of the project would result in emissions that do not exceed the SBCAPCD thresholds of significance. Projects that do not exceed the project-level threshold would not contribute to cumulatively significant air quality impacts. However, even if construction emissions would be less than the 25-ton threshold, the SBCAPCD requires that projects implement construction mitigation measures. Therefore, the project will comply with SBCAPCD required construction mitigation measures. The project would adhere to and comply with applicable SBCAPCD rules and regulations, including permitting requirements for emergency generators. Therefore, the project would be consistent with the land use and population forecasts used in the most recent Clean Air Plan, and would be consistent with Clean Air Plan policies and SBCAPCD rules and regulations. Construction of the project would be potentially significant and require implementation of SBCAPCD recommended mitigation measures. Operation of the project would result in a less than significant cumulative impact with respect to air quality.

5.5.7.2 Cumulative Mitigation Measures

Construction Activities

Mitigation Measure AIR-1 shall be implemented for construction activities.

Operational Activities

No mitigation is required.

5.5.7.3 Residual Cumulative Impacts

Impacts for construction-related activities would be less than significant with mitigation (Class II), while impacts for all other activities would be less than significant (Class III).