



Tentative Tract Map No. 32535
AIR QUALITY IMPACT ANALYSIS
CITY OF WILDOMAR

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LIST OF ABBREVIATED TERMS

(1)	Reference
µg/m ³	Microgram per Cubic Meter
AADT	Annual Average Daily Trips
AQIA	Air Quality Impact Analysis
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARB	California Air Resources Board
BACM	Best Available Control Measures
BMPs	Best Management Practices
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DPM	Diesel Particulate Matter
EPA	Environmental Protection Agency
LST	Localized Significance Threshold
NAAQS	National Ambient Air Quality Standards
NO ₂	Nitrogen Dioxide
NO _x	Oxides of Nitrogen
Pb	Lead
PM ₁₀	Particulate Matter 10 microns in diameter or less
PM _{2.5}	Particulate Matter 2.5 microns in diameter or less
PPM	Parts Per Million
Project	Tentative Tract Map No. 32535
ROG	Reactive Organic Gases
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SIPs	State Implementation Plans
SRA	Source Receptor Area
TAC	Toxic Air Contaminant

TIA	Traffic Impact Analysis
TOG	Total Organic Gases
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds

1 INTRODUCTION

This report presents the results of the air quality impact analysis (AQIA) prepared by Urban Crossroads, Inc., for the Tentative Tract map No. 32535 (referred to as "Project"), and is generally located west of Interstate 15 (I-15), south of Catt Road, and north of Clinton Keith Road City of Wildomar.

The purpose of this AQIA is to evaluate the potential impacts to air quality associated with construction and operation of the proposed Project, and recommend measures to mitigate impacts considered potentially significant in comparison to established regulatory thresholds.

1.1 PROJECT OVERVIEW

The Project applicant proposes a modification of a previously entitled land use, a modification to a previously-approved tentative map, which consisted Of 84 single-family residential lots ("Original Project"). The Original Project was approved by the County of Riverside, before the City of Wildomar was incorporated. The Project proposes the development of 81 single-family residential lots within a 31.40 acre site. For the purposes of this AQIA, it is assumed that the Project will be constructed and at full occupancy by 2016. The Project site is currently vacant and is not generating quantifiable air emissions

1.2 SUMMARY OF FINDINGS

Short-Term Construction

For regional emissions, the Project would exceed the numerical thresholds of significance established by the South Coast Air Quality Management District (SCAQMD) for emissions of volatile organic compounds (VOCs) prior to implementation of applicable mitigation measures (MM). MM AQ-1 through MM AQ-3 are recommended to reduce the impact to less than significant levels. After implementation of MM AQ-1 through MM AQ-3, construction activity emissions will not exceed the numerical thresholds established by the SCAQMD for any phase of construction activity. Thus a less than significant impact will occur with the implementation of applicable mitigation measures.

Without mitigation, emissions during construction activity will exceed the SCAQMD's localized significance threshold for particulate matter emissions (PM10 - particulate matter \leq 10 microns; and PM2.5 - particulate matter \leq 2.5 microns). It should be noted that the impacts without mitigation do not take credit for reductions achieved through best management practices (BMPs) and standard regulatory requirements (Rule 403). After implementation Best Available Control Measures BACM AQ-1 and BACM AQ-2, the emissions resulting from short-term construction activity will not exceed the SCAQMD LST thresholds. A less than significant impact would occur with implementation of BACM AQ-1 and BACM AQ-2. It is assumed that the Original Project would generate an equivalent level of air quality emissions from construction activity since the construction would not be materially different than that for the proposed Project.

EXHIBIT 1-A: PRELIMINARY SITE PLAN



As mitigated, Project construction-source emissions would not conflict with the applicable Air Quality Management Plan (AQMP).

Established requirements addressing construction equipment operations, and construction material use, storage, and disposal requirements act to minimize odor impacts that may result from construction activities. Moreover, construction-source odor emissions would be temporary, short-term, and intermittent in nature and would not result in persistent impacts that would affect substantial numbers of people. Potential construction-source odor impacts are therefore considered less-than-significant.

Long-Term Operational

For regional emissions, the Project would not exceed the numerical thresholds of significance established by the SCAQMD. Thus a less than significant impact would occur for Project-related operational-source emissions both without/with the application of mitigation measures. Project-generated operational emissions from the Original Project would not be materially different than what is expected to occur for the proposed Project.

Project operational-source emissions would not result in or cause a significant localized air quality impact as discussed in the operational LSTs section of this report. The proposed Project would not result in a significant CO “hotspot” as a result of Project related traffic during ongoing operations, nor would the Project result in a significant adverse health impact as discussed in Section 3.9, thus a less than significant impact to sensitive receptors during operational activity is expected.

Project operational-source emissions would not conflict with the AQMP.

Substantial odor-generating sources include land uses such as agricultural activities, feedlots, wastewater treatment facilities, landfills or various heavy industrial uses. The Project does not propose any such uses or activities that would result in potentially significant operational-source odor impacts. Potential sources of operational odors generated by the Project would disposal of miscellaneous residential refuse. Moreover, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances (1). Consistent with City requirements, all Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with solid waste regulations. Potential operational-source odor impacts are therefore considered less-than-significant. Project-generated odors from the Original Project would not be materially different than what is expected to occur for the proposed Project.

1.3 STANDARD REGULATORY REQUIREMENTS/BEST AVAILABLE CONTROL MEASURES (BACMS)

Measures listed below (or equivalent language) shall appear on all Project grading plans, construction specifications and bid documents, and the City shall ensure such language is incorporated prior to issuance of any development permits. City monitoring of construction activities shall be conducted to ensure mitigation compliance.

SCAQMD Rules that are currently applicable during construction activity for this Project include but are not limited to: Rule 1113 (Architectural Coatings) (2); Rule 431.2 (Low Sulfur Fuel) (3);

Rule 403 (Fugitive Dust) (4); and Rule 1186 / 1186.1 (Street Sweepers) (5). In order to facilitate monitoring and compliance, applicable SCAQMD regulatory requirements are summarized below.

BACM AQ-1

The following measures shall be incorporated into Project plans and specifications as implementation of Rule 403 (4):

- All clearing, grading, earth-moving, or excavation activities shall cease when winds exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions.
- The contractor shall ensure that all disturbed unpaved roads and disturbed areas within the Project are watered at least three (3) times daily during dry weather. Watering, with complete coverage of disturbed areas, shall occur at least three times a day, preferably in the mid-morning, afternoon, and after work is done for the day.
- The contractor shall ensure that traffic speeds on unpaved roads and Project site areas are reduced to 15 miles per hour or less

Additional regulatory requirements that are in effect during Project construction include the following:

BACM AQ-2

The California Air Resources Board, in Title 13, Chapter 10, Section 2485, Division 3 of the of the California Code of Regulations, imposes a requirement that heavy duty trucks accessing the site shall not idle for greater than five minutes at any location. This measure is intended to apply to construction traffic. Grading plans shall reference that a sign shall be posted on-site stating that construction workers need to shut off engines at or before five minutes of idling (6).

1.4 CONSTRUCTION-SOURCE AIR QUALITY IMPACT MITIGATION MEASURES

MM AQ-1

Only “Zero-Volatile Organic Compounds” paints (no more than 150 gram/liter of VOC) and/or High Pressure Low Volume (HPLV) applications consistent with South Coast Air Quality Management District Rule 1113 shall be used.

MM AQ-2

During soil export activity when haul distance from the Project is 5 or 15 miles, all construction equipment (≥ 150 horsepower) shall be California Air Resources Board (CARB) Tier 3 Certified or better. Additionally, during soil export activity, total horsepower-hours per day for all equipment shall not exceed 13,352 horsepower-hours per day.

MM AQ-3

During soil export activity the maximum number of two-way haul trips that could occur will be limited to no more than 212 trips per day (106 haul loads of export material).

1.5 OPERATIONAL-SOURCE MITIGATION MEASURES

No significant impacts were identified and no mitigation measures are required

2 AIR QUALITY SETTING

This section provides an overview of the existing air quality conditions in the Project area and region.

2.1 SOUTH COAST AIR BASIN

The Project site is located in the South Coast Air Basin (SCAB) within the jurisdiction of SCAQMD (7). The SCAQMD was created by the 1977 Lewis-Presley Air Quality Management Act, which merged four county air pollution control bodies into one regional district. Under the Act, the SCAQMD is responsible for bringing air quality in areas under its jurisdiction into conformity with federal and state air quality standards. As discussed above, the Project site is located within the South Coast Air Basin, a 6,745-square mile subregion of the SCAQMD, which includes portions of Los Angeles, Riverside, and San Bernardino Counties, and all of Orange County. The larger South Coast district boundary includes 10,743 square miles.

The SCAB is bound by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Los Angeles County portion of the Mojave Desert Air Basin is bound by the San Gabriel Mountains to the south and west, the Los Angeles / Kern County border to the north, and the Los Angeles / San Bernardino County border to the east. The Riverside County portion of the Salton Sea Air Basin is bound by the San Jacinto Mountains in the west and spans eastward up to the Palo Verde Valley.

2.2 REGIONAL CLIMATE

The regional climate has a substantial influence on air quality in the SCAB. In addition, the temperature, wind, humidity, precipitation, and amount of sunshine influence the air quality.

The annual average temperatures throughout the SCAB vary from the low to middle 60s (degrees Fahrenheit). Due to a decreased marine influence, the eastern portion of the SCAB shows greater variability in average annual minimum and maximum temperatures. January is the coldest month throughout the SCAB, with average minimum temperatures of 47°F in downtown Los Angeles and 36°F in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100°F.

Although the climate of the SCAB can be characterized as semi-arid, the air near the land surface is quite moist on most days because of the presence of a marine layer. This shallow layer of sea air is an important modifier of SCAB climate. Humidity restricts visibility in the SCAB, and the conversion of sulfur dioxide to sulfates is heightened in air with high relative humidity. The marine layer provides an environment for that conversion process, especially during the spring and summer months. The annual average relative humidity within the SCAB is 71 percent along the coast and 59 percent inland. Since the ocean effect is dominant, periods of heavy early morning fog are frequent and low stratus clouds are a characteristic feature. These effects decrease with distance from the coast.

More than 90 percent of the SCAB's rainfall occurs from November through April. The annual average rainfall varies from approximately nine inches in Riverside to fourteen inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thunderstorms near the coast and slightly heavier shower activity in the eastern portion of the SCAB with frequency being higher near the coast.

Due to its generally clear weather, about three-quarters of available sunshine is received in the SCAB. The remaining one-quarter is absorbed by clouds. The ultraviolet portion of this abundant radiation is a key factor in photochemical reactions. On the shortest day of the year there are approximately 10 hours of possible sunshine, and on the longest day of the year there are approximately 14 1/2 hours of possible sunshine.

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of the air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with the traveling storms moving through the region from the northwest. This period also brings five to ten periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind. Summer wind flows are created by the pressure differences between the relatively cold ocean and the unevenly heated and cooled land surfaces that modify the general northwesterly wind circulation over southern California. Nighttime drainage begins with the radiational cooling of the mountain slopes. Heavy, cool air descends the slopes and flows through the mountain passes and canyons as it follows the lowering terrain toward the ocean. Another characteristic wind regime in the SCAB is the "Catalina Eddy," a low level cyclonic (counterclockwise) flow centered over Santa Catalina Island which results in an offshore flow to the southwest. On most spring and summer days, some indication of an eddy is apparent in coastal sections.

In the SCAB, there are two distinct temperature inversion structures that control vertical mixing of air pollution. During the summer, warm high-pressure descending (subsiding) air is undercut by a shallow layer of cool marine air. The boundary between these two layers of air is a persistent marine subsidence/inversion. This boundary prevents vertical mixing which effectively acts as an impervious lid to pollutants over the entire SCAB. The mixing height for the inversion structure is normally situated 1,000 to 1,500 feet above mean sea level.

A second inversion-type forms in conjunction with the drainage of cool air off the surrounding mountains at night followed by the seaward drift of this pool of cool air. The top of this layer forms a sharp boundary with the warmer air aloft and creates nocturnal radiation inversions. These inversions occur primarily in the winter, when nights are longer and onshore flow is weakest. They are typically only a few hundred feet above mean sea level. These inversions effectively trap pollutants, such as NOX and CO from vehicles, as the pool of cool air drifts seaward. Winter is therefore a period of high levels of primary pollutants along the coastline.

2.3 WIND PATTERNS AND PROJECT LOCATION

The distinctive climate of the Project area and the SCAB is determined by its terrain and geographical location. The Basin is located in a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean in the southwest quadrant with high mountains forming the remainder of the perimeter.

Wind patterns across the south coastal region are characterized by westerly and southwesterly on-shore winds during the day and easterly or northeasterly breezes at night. Winds are characteristically light although the speed is somewhat greater during the dry summer months than during the rainy winter season.

2.4 EXISTING AIR QUALITY

Existing air quality is measured at established SCAQMD air quality monitoring stations. Monitored air quality is evaluated and in the context of ambient air quality standards. These standards are the levels of air quality that are considered safe, with an adequate margin of safety, to protect the public health and welfare. National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) currently in effect, as well health effects of each pollutant regulated under these standards are shown in Table 2-1 (8) (9).

The determination of whether a region's air quality is healthful or unhealthful is determined by comparing contaminant levels in ambient air samples to the state and federal standards presented in Table 2-1. The air quality in a region is considered to be in attainment by the state if the measured ambient air pollutant levels for O₃, CO, SO₂, NO₂, PM₁₀, and PM_{2.5} are not equaled or exceeded at any time in any consecutive three-year period; and the federal standards (other than O₃, PM₁₀, PM_{2.5}, and those based on annual averages or arithmetic mean) are not exceeded more than once per year. The O₃ standard is attained when the fourth highest eight-hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24 hour standard is attained when 99 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

TABLE 2-1: AMBIENT AIR QUALITY STANDARDS

Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃)	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.075 ppm (147 µg/m ³)		
Respirable Particulate Matter (PM10) ⁸	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
Fine Particulate Matter (PM2.5) ⁸	24 Hour	—	—	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ³		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—	—	
Nitrogen Dioxide (NO ₂) ⁹	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m ³)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹⁰	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m ³)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ¹⁰	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) ¹⁰	—	
Lead ^{11,12}	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m ³ (for certain areas) ¹²	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m ³		
Visibility Reducing Particles ¹³	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹¹	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

See footnotes at: <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>

For more information please call ARB-PIO at (916) 322-2990

California Air Resources Board (6/4/13)

2.5 REGIONAL AIR QUALITY

The SCAQMD monitors levels of various criteria pollutants at 30 monitoring stations throughout the air district. In 2012, the federal and state ambient air quality standards (NAAQS and CAAQS) were exceeded on one or more days for ozone, PM₁₀, and PM_{2.5} at most monitoring locations (10). No areas of the SCAB exceeded federal or state standards for NO₂, SO₂, CO, sulfates or lead. See Table 2-2 for attainment designations for the SCAB (11).

2.6 LOCAL AIR QUALITY

Relative to the Project site, The nearest long-term air quality monitoring site in relation to the project for Ozone (O₃), Carbon Monoxide (CO), and Nitrogen Dioxide (NO₂) is carried out by the South Coast Air Quality Management District (SCAQMD) at the Lake Elsinore monitoring station (SRA 25) located approximately 7.06 miles northwest of the project site (12). Data for Inhalable Particulates (PM₁₀) was obtained from the Perris Valley monitoring station (SRA 24) located approximately 13.15 miles north of the project site. Data for Ultra-Fine Particulates (PM_{2.5}) was obtained from the Metropolitan Riverside County 2 monitoring station (SRA 23), located approximately 25.50 miles northwest of the project site. It should be noted that the Perris Valley and Metropolitan Riverside County 2 monitoring stations were utilized in lieu of the Lake Elsinore monitoring station only where data was not available from the nearest monitoring site.

The most recent three (3) years of data available is shown on Table 2-3 and identifies the number of days ambient air quality standards were exceeded for the study area, which is was considered to be representative of the local air quality at the Project site (10) (13). Additionally, data for SO₂ has been omitted as attainment is regularly met in the South Coast Air Basin and few monitoring stations measure SO₂ concentrations.

Criteria pollutants are pollutants that are regulated through the development of human health based and/or environmentally based criteria for setting permissible levels. Criteria pollutants, their typical sources, and effects are identified below:

- Carbon Monoxide (CO): Is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
- Sulfur Dioxide (SO₂): Is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfates (SO₄). Collectively, these pollutants are referred to as sulfur oxides (SOX).

Nitrogen Oxides (Oxides of Nitrogen, or NO_x): Nitrogen oxides (NO_x) consist of nitric oxide (NO), nitrogen dioxide (NO₂) and nitrous oxide (N₂O) and are formed when nitrogen (N₂) combines with oxygen (O₂). Their lifespan in the atmosphere ranges from one to seven days for nitric oxide and nitrogen dioxide, to 170 years for nitrous oxide. Nitrogen oxides are typically created

during combustion processes, and are major contributors to smog formation and acid deposition. NO₂ is a criteria air pollutant, and may result in numerous adverse health effects; it absorbs blue light, resulting in a brownish-red cast to the atmosphere and reduced visibility. Of the seven types of nitrogen oxide compounds, NO₂ is the most abundant in the atmosphere. As ambient concentrations of NO₂ are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO₂ than those indicated by regional monitors.

- **Ozone (O₃):** Is a highly reactive and unstable gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x), both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
- **PM₁₀ (Particulate Matter less than 10 microns):** A major air pollutant consisting of tiny solid or liquid particles of soot, dust, smoke, fumes, and aerosols. The size of the particles (10 microns or smaller, about 0.0004 inches or less) allows them to easily enter the lungs where they may be deposited, resulting in adverse health effects. PM₁₀ also causes visibility reduction and is a criteria air pollutant.
- **PM_{2.5} (Particulate Matter less than 2.5 microns):** A similar air pollutant consisting of tiny solid or liquid particles which are 2.5 microns or smaller (which is often referred to as fine particles). These particles are formed in the atmosphere from primary gaseous emissions that include sulfates formed from SO₂ release from power plants and industrial facilities and nitrates that are formed from NO_x release from power plants, automobiles and other types of combustion sources. The chemical composition of fine particles highly depends on location, time of year, and weather conditions. PM_{2.5} is a criteria air pollutant.
- **Volatile Organic Compounds (VOC):** Volatile organic compounds are hydrocarbon compounds (any compound containing various combinations of hydrogen and carbon atoms) that exist in the ambient air. VOCs contribute to the formation of smog through atmospheric photochemical reactions and/or may be toxic. Compounds of carbon (also known as organic compounds) have different levels of reactivity; that is, they do not react at the same speed or do not form ozone to the same extent when exposed to photochemical processes. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints. Exceptions to the VOC designation include: carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate. VOCs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The SCAQMD uses the terms VOC and ROG (see below) interchangeably.
- **Reactive Organic Gases (ROG):** Similar to VOC, Reactive Organic Gases (ROG) are also precursors in forming ozone and consist of compounds containing methane, ethane, propane, butane, and longer chain hydrocarbons, which are typically the result of some type of combustion/decomposition process. Smog is formed when ROG and nitrogen oxides react in the presence of sunlight. ROGs are a criteria pollutant since they are a precursor to O₃, which is a criteria pollutant. The SCAQMD uses the terms ROG and VOC (see previous) interchangeably.
- **Lead (Pb):** Lead is a heavy metal that is highly persistent in the environment. In the past, the primary source of lead in the air was emissions from vehicles burning leaded gasoline. As a result of the removal of lead from gasoline, there have been no violations at any of the SCAQMD's regular air monitoring stations since 1982. Currently, emissions of lead are largely limited to stationary sources such as lead smelters. It should be noted that the Project is not anticipated to generate a quantifiable amount of lead emissions. Lead is a criteria air pollutant.

TABLE 2-2: ATTAINMENT STATUS OF CRITERIA POLLUTANTS IN THE SOUTH COAST AIR BASIN (SCAB)

Criteria Pollutant	State Designation	Federal Designation
Ozone - 1hour standard	Nonattainment	No Standard
Ozone - 8 hour standard	Nonattainment	Extreme Nonattainment
PM ₁₀	Nonattainment	Serious Nonattainment
PM _{2.5}	Nonattainment	Nonattainment
Carbon Monoxide	Attainment	Attainment/Maintenance
Nitrogen Dioxide	Nonattainment ²	Attainment/Maintenance
Sulfur Dioxide	Attainment	Attainment
Lead	Attainment/Nonattainment	Attainment/Nonattainment
All others	Attainment/Unclassified	Attainment/Unclassified

TABLE 2-3: PROJECT AREA AIR QUALITY MONITORING SUMMARY 2010-2012

POLLUTANT ¹	STANDARD	YEAR		
		2010	2011	2012
Ozone (O ₃)				
Maximum 1-Hour Concentration (ppm)		0.107	0.133	0.111
Maximum 8-Hour Concentration (ppm)		0.091	0.106	0.089
Number of Days Exceeding State 1-Hour Standard	> 0.09 ppm	15	19	10
Number of Days Exceeding State 8-Hour Standard	> 0.07 ppm	42	45	32
Number of Days Exceeding Federal 1-Hour Standard	> 0.12 ppm	0	1	0
Number of Days Exceeding Federal 8-Hour Standard	> 0.075 ppm	0	1	17
Number of Days Exceeding Health Advisory	≥ 0.15 ppm	24	28	0
Carbon Monoxide (CO)				
Maximum 1-Hour Concentration (ppm)		1	1.7	2.7
Maximum 8-Hour Concentration (ppm)		0.6	0.7	0.7
Number of Days Exceeding State 1-Hour Standard	> 20 ppm	0	0	0
Number of Days Exceeding Federal / State 8-Hour Standard	> 9.0 ppm	0	0	0
Number of Days Exceeding Federal 1-Hour Standard	> 35 ppm	0	0	0
Nitrogen Dioxide (NO ₂)				
Maximum 1-Hour Concentration (ppm)		0.0512	0.0503	0.048
Annual Arithmetic Mean Concentration (ppm)		0.0101	0.0096	-
Number of Days Exceeding State 1-Hour Standard	> 0.18 ppm	0	0	0
Particulate Matter ≤ 10 Microns (PM ₁₀)				
Maximum 24-Hour Concentration (µg/m ³)		51	65	62
Annual Arithmetic Mean (µg/m ³)		61	60	-
Number of Samples		1	3	60
Number of Samples Exceeding State Standard	> 50 µg/m ³	0	0	7
Number of Samples Exceeding Federal Standard	> 150 µg/m ³	51	65	0
Particulate Matter ≤ 2.5 Microns (PM _{2.5})				
Maximum 24-Hour Concentration (µg/m ³)		43.7	51.6	30.2
Annual Arithmetic Mean (µg/m ³)		11.0	11.8	--
Number of Samples		115	112	104
Number of Samples Exceeding Federal 24-Hour Standard	> 35 µg/m ³	2	2	0

¹ Source: SCAQMD & US EPA, O₃, CO, NO₂ data obtained from Lake Elsinore (SRA 25) Monitoring Station, data for PM₁₀ obtained from Perris Valley (SRA 24) Monitoring Station, data for PM_{2.5} obtained from Riverside County 2 (SRA 23) Monitoring Station.

Health Effects of Air Pollutants

Ozone

Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered to be the most susceptible subgroups for ozone effects. Short-term exposure (lasting for a few hours) to ozone at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated ozone levels are associated with increased school absences. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in communities with high ozone levels.

Ozone exposure under exercising conditions is known to increase the severity of the responses described above. Animal studies suggest that exposure to a combination of pollutants that includes ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

Carbon Monoxide

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport and competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin (COHb). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (oxygen deficiency) as seen at high altitudes.

Reduction in birth weight and impaired neurobehavioral development have been observed in animals chronically exposed to CO, resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels; these include pre-term births and heart abnormalities.

Particulate Matter

A consistent correlation between elevated ambient fine particulate matter (PM₁₀ and PM_{2.5}) levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer.

Daily fluctuations in PM_{2.5} concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children, and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with longterm exposure to particulate matter.

The elderly, people with pre-existing respiratory or cardiovascular disease, and children appear to be more susceptible to the effects of high levels of PM₁₀ and PM_{2.5}.

Nitrogen Dioxide

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposure to NO₂ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO₂ in healthy subjects. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

In animals, exposure to levels of NO₂ considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of ozone and NO₂.

Sulfur Dioxide

A few minutes of exposure to low levels of SO₂ can result in airway constriction in some asthmatics, all of whom are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂.

Animal studies suggest that despite SO₂ being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, very high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate the effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Lead

Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. Exposure to low levels of Pb can adversely affect the development and function of

the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased Pb levels are associated with increased blood pressure.

Pb poisoning can cause anemia, lethargy, seizures, and death; although it appears that there are no direct effects of Pb on the respiratory system. Pb can be stored in the bone from early age environmental exposure, and elevated blood Pb levels can occur due to breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of Pb because of previous environmental Pb exposure of their mothers.

Odors

The science of odor as a health concern is still new. Merely identifying the hundreds of VOCs that cause odors poses a big challenge. Offensive odors can potentially affect human health in several ways. First, odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Second, studies have shown that the VOCs that cause odors can stimulate sensory nerves to cause neurochemical changes that might influence health, for instance, by compromising the immune system. Finally, unpleasant odors can trigger memories or attitudes linked to unpleasant odors, causing cognitive and emotional effects such as stress.

2.7 REGULATORY BACKGROUND

2.7.1 FEDERAL REGULATIONS

The U.S. EPA is responsible for setting and enforcing the NAAQS for O₃, CO, NO_x, SO₂, PM₁₀, and lead (8). The U.S. EPA has jurisdiction over emissions sources that are under the authority of the federal government including aircraft, locomotives, and emissions sources outside state waters (Outer Continental Shelf). The U.S. EPA also establishes emission standards for vehicles sold in states other than California. Automobiles sold in California must meet the stricter emission requirements of the CARB.

The Federal Clean Air Act (CAA) was first enacted in 1955, and has been amended numerous times in subsequent years (1963, 1965, 1967, 1970, 1977, and 1990). The CAA establishes the federal air quality standards, the NAAQS, and specifies future dates for achieving compliance (14). The CAA also mandates that states submit and implement State Implementation Plans (SIPs) for local areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA that identify specific emission reduction goals for areas not meeting the NAAQS require a demonstration of reasonable further progress toward attainment and incorporate additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most directly applicable to the development of the Project site include Title I (Non-Attainment Provisions) and Title II (Mobile Source Provisions). Title I provisions were established with the goal of attaining the NAAQS for the following criteria pollutants O₃, NO₂, SO₂, PM₁₀, CO, PM_{2.5}, and lead. The NAAQS were amended in July 1997 to include an

additional standard for O₃ and to adopt a NAAQS for PM_{2.5}. Table 3-1 (previously presented) provides the NAAQS within the basin.

Mobile source emissions are regulated in accordance with Title II provisions. These provisions require the use of cleaner burning gasoline and other cleaner burning fuels such as methanol and natural gas. Automobile manufacturers are also required to reduce tailpipe emissions of hydrocarbons and nitrogen oxides (NO_x). NO_x is a collective term that includes all forms of nitrogen oxides (NO, NO₂, NO₃) which are emitted as byproducts of the combustion process.

2.7.2 CALIFORNIA REGULATIONS

The CARB, which became part of the California EPA in 1991, is responsible for ensuring implementation of the California Clean Air Act (AB 2595), responding to the federal CAA, and for regulating emissions from consumer products and motor vehicles. The California CAA mandates achievement of the maximum degree of emissions reductions possible from vehicular and other mobile sources in order to attain the state ambient air quality standards by the earliest practical date. The CARB established the CAAQS for all pollutants for which the federal government has NAAQS and, in addition, establishes standards for sulfates, visibility, hydrogen sulfide, and vinyl chloride. However at this time, hydrogen sulfide and vinyl chloride are not measured at any monitoring stations in the SCAB because they are not considered to be a regional air quality problem. Generally, the CAAQS are more stringent than the NAAQS (9) (8).

Local air quality management districts, such as the SCAQMD, regulate air emissions from commercial and light industrial facilities. All air pollution control districts have been formally designated as attainment or non-attainment for each CAAQS.

Serious non-attainment areas are required to prepare air quality management plans that include specified emission reduction strategies in an effort to meet clean air goals. These plans are required to include:

- Application of Best Available Retrofit Control Technology to existing sources;
- Developing control programs for area sources (e.g., architectural coatings and solvents) and indirect sources (e.g. motor vehicle use generated by residential and commercial development);
- A District permitting system designed to allow no net increase in emissions from any new or modified permitted sources of emissions;
- Implementing reasonably available transportation control measures and assuring a substantial reduction in growth rate of vehicle trips and miles traveled;
- Significant use of low emissions vehicles by fleet operators;
- Sufficient control strategies to achieve a five percent or more annual reduction in emissions or 15 percent or more in a period of three years for ROG_s, NO_x, CO and PM₁₀. However, air basins may use alternative emission reduction strategy that achieves a reduction of less than five percent per year under certain circumstances.

2.7.3 AIR QUALITY MANAGEMENT PLANNING

Currently, the NAAQS and CAAQS are exceeded in most parts of the SCAB. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards (15). AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy. A detailed discussion on the AQMP and Project consistency with the AQMP is provided in Section 3.8.

2.8 EXISTING PROJECT SITE AIR QUALITY CONDITIONS

The Project site is currently vacant, and therefore does not generate quantifiable emissions. Existing air quality conditions at the Project site would generally reflect ambient monitored conditions as presented previously at Table 2-3.

3 PROJECT AIR QUALITY IMPACT

3.1 INTRODUCTION

The Project has been evaluated to determine if it will violate an air quality standard or contribute to an existing or projected air quality violation. Additionally, the Project has been evaluated to determine if it will result in a cumulatively considerable net increase of a criteria pollutant for which the SCAB is non-attainment under an applicable federal or state ambient air quality standard. The significance of these potential impacts is described in the following section.

3.2 STANDARDS OF SIGNIFICANCE

The criteria used to determine the significance of potential Project-related air quality impacts are taken from the Initial Study Checklist in Appendix G of the State CEQA Guidelines (14 California Code of Regulations §§15000, et seq.). Based on these thresholds, a project would result in a significant impact related to air quality if it would (16):

- Conflict with or obstruct implementation of the applicable air quality plan.
- Violate any air quality standard or contribute to an existing or projected air quality violation.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentrations.
- Create objectionable odors affecting a substantial number of people.

Within the context of the above threshold considerations, and based on the SCAQMD's CEQA Air Quality Handbook (1993), a project's localized CO emissions impacts would be significant if they exceed the following California standards for localized CO concentrations (17):

- 1-hour CO standard of 20.0 parts per million (ppm)
- 8-hour CO standard of 9.0 ppm.

The SCAQMD has also developed regional and localized significance thresholds for other regulated pollutants, as summarized at Table 3-1 (18). The SCAQMD's CEQA Air Quality Significance Thresholds (March 2011) indicate that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

TABLE 3-1: MAXIMUM DAILY EMISSIONS REGIONAL THRESHOLDS

Pollutant	Construction	Operations
NOx	100 lbs/day	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM10	150 lbs/day	150 lbs/day
PM2.5	55 lbs/day	55 lbs/day
Sox	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day

3.3 PROJECT-RELATED SOURCES OF POTENTIAL IMPACT

Land uses such as the Project affect air quality through construction-source and operational-source emissions.

On October 2, 2013, the SCAQMD in conjunction with the California Air Pollution Control Officers Association (CAPCOA) released the latest version of the California Emissions Estimator Model™ (CalEEMod™) v2013.2.2. The purpose of this model is to calculate construction-source and operational-source criteria pollutant (NO_x, VOC, PM₁₀, PM_{2.5}, SO_x, and CO) and greenhouse gas (GHG) emissions from direct and indirect sources; and quantify applicable air quality and GHG reductions achieved from mitigation measures (19). Accordingly, the latest version of CalEEMod™ has been used for this Project to determine construction and operational air quality emissions. Output from the model runs for both construction and operational activity are provided in Appendix 3.1.

3.4 CONSTRUCTION EMISSIONS

Construction activities associated with the Project will result in emissions of CO, VOCs, NO_x, SO_x, PM₁₀, and PM_{2.5}. Construction related emissions are expected from the following construction activities:

- Soil Export
- Grading
- Building Construction
- Paving
- Painting (Architectural Coatings)
- Construction Workers Commuting

Construction is expected to commence in April 2014 and will last through October 2016. The construction schedule utilized in the analysis represents a “worst-case” analysis scenario should construction occur any time after the respective dates since emission factors for construction decrease as the analysis year increases. The duration of construction activity and associated

equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. Site specific construction fleet may vary due to specific project needs at the time of construction. The duration of construction activity and associated equipment was estimated based on construction of similar projects and CalEEMod model defaults. Please refer to specific detailed modeling inputs/outputs contained in Appendix 3.1 of this Analysis. A detailed summary of construction equipment assumptions by phase is provided at Table 3-2. It should be noted that the emissions estimates provided at Table 3-2 represent a “worst-case” (i.e. overestimation) of actual emissions that will likely occur.

Dust is typically a major concern during rough grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called “fugitive emissions”. Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). The CalEEMod model was utilized to calculate fugitive dust emissions resulting from this phase of activity.

Construction of the Project will require the export of approximately 202,907 cubic yards of soil. It is estimated that 106 haul truck loads will be required per day for the duration of soil export activities. Each truck will generate one (1) inbound and one (1) outbound trip, accounting for a total of two (2) truck trips per load of material exported. Thus, a total of 212 haul trips (two-way) per day will be generated, which translates to approximately 30 haul trips (two-way) per hour. It should be noted that truck trips associated with soil export activities would generally occur between 9:00 AM and 4:00 PM, which is outside the typical “commute traffic” peak hours in the project vicinity. Soil export will commence early April 2014 for a duration of approximately five months (or 120 working-days). However, since an export site is not yet defined, this assessment includes a soil export scenario based on a haul distance of 1, 5, and 15 miles from the Project.

Construction emissions for construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction materials delivered to the Project site) were estimated based on information from the applicant and the CalEEMod model.

3.4.1 CONSTRUCTION EMISSIONS SUMMARY

Impacts without BACMs and Mitigation

The estimated maximum daily construction emissions without mitigation are summarized on Table 3-3, Table 3-5, and Table 3-7. Detailed construction model outputs are presented in Appendix 3.1. Under the assumed scenarios, emissions resulting from the Project construction will exceed criteria pollutant thresholds established by the SCAQMD for emissions of VOCs (before mitigation). It should be noted that the impacts without Best Available Control Measures (BACMs) do not take credit for reductions achieved through BACMs and standard regulatory requirements (SCAQMD’s Rule 403).

Impacts with BACMs and Mitigation

The estimated maximum daily construction emissions with mitigation are summarized on Table 3-4, Table 3-6, and Table 3-8. Detailed construction model outputs are presented in Appendix 3.1. Best Available Control measures BACM AQ-1 and BACM AQ-2 as well as mitigation measures MM AQ-1 through MM AQ-3 are recommended to reduce the severity of the impact. After implementation of the recommended mitigation measures, construction activity emissions will not exceed the numerical thresholds established by the SCAQMD for criteria pollutants. Thus a less than significant impact would occur with implementation of the applicable mitigation measures. It is assumed that the Original Project would generate an equivalent level of air quality emissions from construction activity since the construction would not be materially different than that for the proposed Project.

TABLE 3-2: CONSTRUCTION EQUIPMENT ASSUMPTIONS

Equipment	Scraper	Grader	Rubber Tired Dozer	Tractor / Loader / Backhoe	Excavator	Pavers	Rollers	Paving Equipment	Forklift	Generator Sets	Cranes	Welder	Air Compressor
Soil Export	2	1	1	2	2								
Grading	2	1	1	2	2								
Building Construction				3					3	1	1	1	
Paving						2	2	2					
Architectural Coatings													1

TABLE 3-3: EMISSIONS SUMMARY OF OVERALL CONSTRUCTION WITH A 1 MILE (ONE-WAY) HAUL DISTANCE (WITHOUT MITIGATION)

Year	VOC	NOx	CO	SOx	PM10	PM2.5
2014	9.23	89.44	88.19	0.08	13.25	7.40
2015	5.04	38.47	36.13	0.06	4.23	2.72
2016	102.98	61.93	54.64	0.09	6.07	4.11
Maximum Daily Emissions	102.98	89.44	88.19	0.09	13.25	7.40
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	YES	NO	NO	NO	NO	NO

TABLE 3-4: EMISSIONS SUMMARY OF OVERALL CONSTRUCTION WITH A 1 MILES (ONE-WAY) HAUL DISTANCE (WITH MITIGATION)

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2014	9.23	89.44	88.19	0.08	7.87	5.18
2015	5.04	38.47	36.13	0.06	4.23	2.72
2016	64.75	61.93	54.64	0.09	6.07	4.11
Maximum Daily Emissions	64.75	89.44	88.19	0.08	7.87	5.18
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

TABLE 3-5: EMISSIONS SUMMARY OF OVERALL CONSTRUCTION WITH A 5 MILES (ONE-WAY) HAUL DISTANCE (WITHOUT MITIGATION)

Year	VOC	NOx	CO	SOx	PM10	PM2.5
2014	9.78	104.00	92.09	0.11	14.28	7.86
2015	5.04	38.47	36.13	0.06	4.23	2.72
2016	102.98	61.93	54.64	0.09	6.07	4.11
Maximum Daily Emissions	102.98	104.00	92.09	0.11	14.28	7.86
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	YES	YES	NO	NO	NO	NO

TABLE 3-6: EMISSIONS SUMMARY OF OVERALL CONSTRUCTION WITH A 5 MILES (ONE-WAY) HAUL DISTANCE (WITH MITIGATION)

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2014	5.03	56.65	78.62	0.11	6.63	3.67
2015	4.44	32.34	36.06	0.06	3.93	2.46
2016	64.17	56.08	54.66	0.09	5.78	3.86
Maximum Daily Emissions	64.17	56.65	78.62	0.11	6.63	3.86
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

TABLE 3-7: EMISSIONS SUMMARY OF OVERALL CONSTRUCTION WITH A 15 MILES (ONE-WAY) HAUL DISTANCE (WITHOUT MITIGATION)

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2014	11.18	140.38	101.85	0.18	16.83	9.03
2015	5.04	38.47	36.13	0.06	4.23	2.72
2016	102.98	61.93	54.64	0.09	6.07	4.11
Maximum Daily Emissions	102.98	140.38	101.85	0.18	16.83	9.03
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	YES	YES	NO	NO	NO	NO

TABLE 3-8: EMISSIONS SUMMARY OF OVERALL CONSTRUCTION WITH A 15 MILES (ONE-WAY) HAUL DISTANCE (WITH MITIGATION)

Year	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2014	6.42	93.04	88.38	0.18	9.18	4.84
2015	4.44	32.34	36.06	0.06	3.93	2.46
2016	64.17	56.08	54.66	0.09	5.78	3.86
Maximum Daily Emissions	64.17	93.04	88.38	0.18	9.18	4.84
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

3.5 OPERATIONAL EMISSIONS

Operational activities associated with the proposed Project will result in emissions of ROG, NOX, CO, SOX, PM10, and PM2.5. Operational emissions would be expected from the following primary sources:

- Vehicles
- Combustion Emissions Associated with Natural Gas and Electricity
- Fugitive dust related to vehicular travel
- Landscape maintenance equipment
- Emissions from consumer products
- Architectural coatings

3.5.1 VEHICLES

Project operational (vehicular) impacts are dependent on both overall daily vehicle trip generation and the effect of the Project on peak hour traffic volumes and traffic operations in the vicinity of the Project. The Project related operational air quality impacts derive primarily from vehicle trips generated by the Project.

3.5.2 COMBUSTION EMISSIONS ASSOCIATED WITH NATURAL GAS AND ELECTRICITY

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity is generally excluded from the evaluation of significance and only natural gas use is considered. The emissions associated with natural gas use were calculated using the CalEEMod model.

3.5.3 FUGITIVE DUST RELATED TO VEHICULAR TRAVEL

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates. The emissions estimates for travel on paved roads were calculated using the CalEEMod model.

3.5.4 LANDSCAPE MAINTENANCE EQUIPMENT

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. The emissions associated with landscape maintenance equipment were calculated based on assumptions provided in the CalEEMod model.

3.5.5 CONSUMER PRODUCTS

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on assumptions provided in the CalEEMod model.

3.5.6 ARCHITECTURAL COATINGS

Over a period of time the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. The emissions associated with architectural coatings were calculated using the CalEEMod model.

3.5.7 OPERATIONAL EMISSIONS SUMMARY

Impacts Without Mitigation

Prior to implementation of appropriate mitigation measures, Project operational-source emissions would not exceed applicable SCAQMD regional thresholds of significance. Therefore, a less than significant impact would occur both without and with the application of appropriate mitigation measures, operational-source emissions without implementation of mitigation measures are summarized on Table 3-5

TABLE 3-5: SUMMARY OF PEAK OPERATIONAL EMISSIONS (WITHOUT MITIGATION)

Operational Activities – Summer Emissions	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source Emissions	10.37	0.08	6.78	3.50e-4	0.15	0.14
Energy Source Emissions	0.08	0.69	0.29	4.41e-3	0.06	0.06
Mobile Emissions	3.39	10.53	40.72	0.09	6.06	1.71
Maximum Daily Emissions	13.84	11.30	47.80	0.10	6.26	1.91
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Operational Activities – Winter Emissions	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Source Emissions	10.37	0.08	6.78	3.50e-4	0.14	0.14
Energy Source Emissions	0.08	0.69	0.29	4.41e-3	0.06	0.06
Mobile Emissions	3.28	11.00	37.61	0.08	6.06	1.71
Maximum Daily Emissions	13.73	11.77	44.69	0.09	6.26	1.91
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO

Comparative Operational Emissions Impacts

The Project applicant proposes a modification of a previously entitled land use, a modification to a previously-approved tentative map, which consisted Of 84 single-family residential lots. The Original Project was approved by the County of Riverside, before the City of Wildomar was incorporated. The Project proposes the development of 81 single-family residential lots within a 31.40 acre site. For informational purposes, operational-source air pollutant emissions generated under the Original Project are summarized and compared to the Proposed Project at Tables 3-6. As indicated at Tables 3-6, the transition of the Original Project from 84 single-family residential lots to 81 single-family residential lots would result in decrease in emissions under all criteria pollutant categories. Therefore, the Project's air quality impacts will be less than or roughly equivalent to the Original Project's air quality impacts.

**TABLE 3-6: SUMMARY OF ORIGINAL PROJECT VS PROPOSED PROJECT OPERATIONAL EMISSIONS
(WITHOUT MITIGATION)**

Summer Emissions	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Original Project Emissions						
Area Source Emissions	10.50	0.08	7.04	3.70e-4	0.15	0.15
Energy Source Emissions	0.08	0.72	0.30	4.57e-3	0.06	0.06
Mobile Emissions	3.52	10.92	42.23	0.09	6.28	1.78
Total Existing Daily Emissions	14.10	11.72	49.57	0.10	6.49	1.98
Proposed Project Emissions						
Area Source Emissions	10.37	0.08	6.78	3.50e-4	0.15	0.14
Energy Source Emissions	0.08	0.69	0.29	4.41e-3	0.06	0.06
Mobile Emissions	3.39	10.53	40.72	0.09	6.06	1.71
Total Proposed	13.84	11.30	47.80	0.10	6.26	1.91
Incremental Difference	-0.26	-0.42	-1.77	--	-0.23	-0.07

Winter Emissions	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Original Project Emissions						
Area Source Emissions	10.50	0.08	7.04	3.70e-4	0.15	0.15
Energy Source Emissions	0.08	0.72	0.30	4.57e-3	0.06	0.06
Mobile Emissions	3.40	11.41	39.00	0.09	6.29	1.78
Total Existing Daily Emissions	13.99	12.21	46.34	0.09	6.49	1.98
Proposed Project Emissions						
Area Source Emissions	10.37	0.08	6.78	3.50e-4	0.14	0.14
Energy Source Emissions	0.08	0.69	0.29	4.41e-3	0.06	0.06
Mobile Emissions	3.28	11.00	37.61	0.08	6.06	1.71
Total Proposed	13.73	11.77	44.69	0.09	6.26	1.91
Incremental Difference	-0.26	-0.44	-1.65	--	-0.23	-0.07

3.6 LOCALIZED SIGNIFIANCE - CONSTRUCTION ACTIVITY

The analysis makes use of methodology included in the SCAQMD *Final Localized Significance Threshold Methodology* (Methodology) (3). As previously discussed, the SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as Localized Significance Thresholds (LSTs).

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of a given project are above or below State standards. In the case of CO and NO₂, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM₁₀ and PM_{2.5}; both of which are non-attainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice 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 federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

LSTs were developed in response to environmental justice and health concerns raised by the public regarding exposure of individuals to criteria pollutants in local communities. To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the SCAQMD *Final Localized Significance Threshold Methodology* (Methodology) (SCAQMD, June 2003).

Applicability of LSTs for the Project

For this Project, the appropriate Source Receptor Area (SRA) for the LST is the Lake Elsinore monitoring station (SRA 25). LSTs apply to carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter ≤ 10 microns (PM₁₀), and particulate matter ≤ 2.5 microns (PM_{2.5}). The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size.

In order to determine the appropriate methodology for determining localized impacts that could occur as a result of Project-related construction, the following process is undertaken:

- The CalEEMod model is utilized to determine the maximum daily on-site emissions that will occur during construction activity.
- The SCAQMD's Fact Sheet for Applying CalEEMod to Localized Significance Thresholds (21) is used to determine the maximum site acreage that is actively disturbed based on the construction equipment fleet and equipment hours as estimated in CalEEMod.

- If the total acreage disturbed is less than or equal to five acres per day, then the SCAQMD's screening look-up tables are utilized to determine if a Project has the potential to result in a significant impact (the SCAQMD recommends that Projects exceeding the screening look-up tables undergo dispersion modeling to determine actual impacts). The look-up tables establish a maximum daily emissions threshold in pounds per day that can be compared to CalEEMod outputs.
- If the total acreage disturbed is greater than five acres per day, then the SCAQMD recommends dispersion modeling to be conducted to determine the actual pollutant concentrations for applicable LSTs in the air. In other words, the maximum daily on-site emissions as calculated in CalEEMod are modeled via air dispersion modeling to calculate the actual concentration in the air (e.g., parts per million or micrograms per cubic meter) in order to determine if any applicable thresholds are exceeded.

Maximum Daily Disturbed-Acreage

Table 3-7 is used to determine the maximum daily disturbed-acreage for use in determining the applicability of the SCAQMD's LST look-up tables. As shown, the Project could actively disturb approximately 4 acres per day and thus would not exceed the 5 acre per day limit established by the SCAQMD's LST look-up tables. As such, the SCAQMD's screening look-up tables are used to determine maximum daily pollutant concentrations during construction activity.

TABLE 3-7 MAXIMUM DAILY DISTURBED-ACREAGE

Construction Phase	Equipment Type	Equipment Quantity	Acres grader per 8 hour day	Operating Hours per Day	Acres graded per day
Grading	Tractors	2	0.5	8	1.0
	Graders	1	0.5	8	0.5
	Rubber Tired Dozers	1	0.5	8	0.5
	Scrapers	2	1	8	2.0
Total acres graded per day					4.0
Applicable LST Mass Rate Look-up Table					4 acre

Based on Table 3-7, the proposed Project will result in a maximum of 4.0 acres disturbed during peak construction activity on any given day. This estimate is based on the construction equipment assumptions embedded in the CalEEMod™ model defaults and represent a reasonable approximation of the expected construction fleet as required per CEQA guidelines. Site specific construction fleet may vary due to specific project needs at the time of construction.

The appropriate Source Receptor Area (SRA) for the LST analysis is the Lake Elsinore area (SRA 25). LSTs apply to carbon monoxide (CO), nitrogen dioxide (NO₂), particulate matter ≤ 10 microns (PM₁₀), and particulate matter ≤ 2.5 microns (PM_{2.5}).

Emissions Considered

SCAQMD’s Methodology clearly states that “off-site mobile emissions from the Project should NOT be included in the emissions compared to LSTs (20).” Therefore, for purposes of the construction LST analysis only emissions included in the CalEEMod “on-site” emissions output were considered.

Receptors

The nearest sensitive receptor land use is located immediately adjacent, approximately ~58.03 feet/17.69 meters to the north of the Project site. Notwithstanding, the *Methodology* explicitly states that “It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters (20).” Accordingly, LSTs for receptors at 25 meters are utilized in this analysis and provide for a conservative i.e. “health protective” standard of care.

Impacts without BACMS and Mitigation

Without mitigation, emissions during construction activity will exceed the SCAQMD’s localized significance thresholds for emissions of PM₁₀ and PM_{2.5} only. Table 3-8 identifies the unmitigated localized impacts at the nearest receptor location in the vicinity of the Project. It should be noted that the impacts without mitigation do not take credit for reductions achieved through BACMs which include standard regulatory requirements (SCAQMD’s Rule 403). It is assumed that the Original Project would generate an equivalent level of air quality emissions from construction activity since the construction would not be materially different than that for the proposed Project.

TABLE 3-8: LOCALIZED SIGNIFICANCE SUMMARY CONSTRUCTION (WITHOUT MITIGATION)

On-Site Grading Emissions	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	80.72	51.58	12.55	7.17
SCAQMD Localized Threshold	325.33	1,676.67	11	6.67
Threshold Exceeded?	NO	NO	YES	YES

Impacts with BACMs and Mitigation

After the implementation of applicable mitigation measures (MM AQ1 through MM AQ3), emissions during construction activity will not exceed the SCAQMD’s localized significance threshold for any of the applicable emissions. Table 3-9 identifies the mitigated localized impacts at the nearest receptor location in the vicinity of the Project. It is assumed that the Original Project would generate an equivalent level of air quality emissions from construction activity since the construction would not be materially different than that for the proposed Project.

TABLE 3-9: LOCALIZED SIGNIFICANCE SUMMARY CONSTRUCTION (WITH MITIGATION)

On-Site Grading Emissions	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	80.72	51.58	7.26	4.97
SCAQMD Localized Threshold	325.33	1,676.67	11	6.67
Threshold Exceeded?	NO	NO	NO	NO

3.7 LOCALIZED SIGNIFICANCE – LONG-TERM OPERATIONAL ACTIVITY

Table 3-10 shows the calculated emissions for the Project’s operational activities compared with the applicable LSTs. The LST analysis includes on-site sources only; however, the CalEEMod™ model outputs do not separate on-site and off-site emissions from mobile sources. In an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown on Table 3-10 represent all on-site Project-related stationary (area) sources and five percent (5%) of the Project-related mobile sources. Considering that the weighted trip length used in CalEEMod™ for the Project is approximately 16.6 miles, 5% of this total would represent an on-site travel distance for each car and truck of approximately 1 mile or 5,280 feet, thus the 5% assumption is conservative and would tend to overstate the actual impact. Modeling based on these assumptions demonstrates that even within broad encompassing parameters, Project operational-source emissions would not exceed applicable LSTs.

The operational LSTs are located approximately 17.69 meters north of the Project site within SRA 25. As noted above and indicated at Exhibit 3-A, sensitive receptors may be located nearer immediately adjacent to the Project site boundaries. Notwithstanding, the *Methodology* explicitly states that “It is possible that a project may have receptors closer than 25 meters. Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters (20).” Accordingly, LSTs for receptors at 25 meters are utilized in this analysis and provide for a conservative i.e. “health protective” standard of care. If emissions exceed the LST for a 5-acre site, then dispersion modeling needs to be conducted.

TABLE 3-10: LOCALIZED SIGNIFICANCE SUMMARY OPERATIONS (WITHOUT MITIGATION)

Operational Activity	NO _x	CO	PM ₁₀	PM _{2.5}
Maximum Daily Emissions	1.34	9.45	0.52	0.30
SCAQMD Localized Threshold	325.33	1,676.67	3.33	1.67
Threshold Exceeded?	NO	NO	NO	NO

As shown on Table 3-10, operational emissions would not exceed the LST thresholds for the nearest sensitive receptor. Therefore, the Project will have a less than significant localized impact during operational activity. Project-generated operational emissions from the Original Project would not be materially different than what is expected to occur for the proposed Project.

3.8 CO “HOT SPOT” ANALYSIS

As discussed below, the Project would not result in potentially adverse CO concentrations or “hot spots.” Further, detailed modeling of Project-specific carbon monoxide (CO) “hot spots” is not needed to reach this conclusion.

It has long been recognized that adverse localized CO concentrations (“hot spots”) are caused by vehicular emissions, primarily when idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last twenty years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams/mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentrations in the Project vicinity have steadily declined, as indicated by historical emissions data presented previously at Table 2-3.

A CO “hotspot” would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur. At the time of the 1993 Handbook, the SCAB was designated nonattainment under the California AAQS and National AAQS for CO (17). As identified within SCAQMD's 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of congestion at a particular intersection (22). To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO “hot spot” analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This hot spot analysis did not predict any violation of CO standards. It can therefore be reasonably concluded that projects (such as the proposed Tentative Tract Map No. 32535) that are not subject to the extremes in vehicle volumes and vehicle congestion that was evidenced in the 2003 Los Angeles hot spot analysis would similarly not create or result in CO hot spots. Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (23). The proposed Project considered herein would not produce the volume of traffic required to generate a CO hotspot either in the context of the 2003 Los Angeles hot spot study, or based on representative BAAQMD CO threshold considerations (see Table 3-1). Therefore, CO hotspots are not an environmental impact of concern for the proposed Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. Project-generated potential for CO Hotspots from the Original Project would not be materially different than what is expected to occur for the proposed Project.

TABLE 3-11: CO MODELING RESULTS FROM THE 1992 CO PLAN/2003 AQMP (PPM)

Intersection Location	Morning 1-hour	Afternoon 1-hour	Peak 1-hour	8-hour
Wilshire-Veteran	4.6	3.5	--	4.2
Sunset-Highland	4.0	4.5	--	3.9
La Cienega-Century	3.7	3.1	--	5.8
Long Beach-Imperial	3.0	3.1	1.2	9.3

Notes: ppm = parts per million. Federal 1-hour standard is 35 ppm and the federal 8- hour standard is 9.0 ppm.

3.9 AIR QUALITY MANAGEMENT PLANNING

The Project site is located within the SCAB, which is characterized by relatively poor air quality. The SCAQMD has jurisdiction over an approximately 10,743 square-mile area consisting of the four-county Basin and the Los Angeles County and Riverside County portions of what use to be referred to as the Southeast Desert Air Basin. In these areas, the SCAQMD is principally responsible for air pollution control, and works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, as well as state and federal agencies to reduce emissions from stationary, mobile, and indirect sources to meet state and federal ambient air quality standards.

Currently, these state and federal air quality standards are exceeded in most parts of the Basin. In response, the SCAQMD has adopted a series of Air Quality Management Plans (AQMPs) to meet the state and federal ambient air quality standards. AQMPs are updated regularly in order to more effectively reduce emissions, accommodate growth, and to minimize any negative fiscal impacts of air pollution control on the economy.

The Final 2012 AQMP was adopted by the AQMD Governing Board on December 7, 2012 (15). The 2012 AQMP incorporates the latest scientific and technological information and planning assumptions, including the 2012 Regional Transportation Plan/Sustainable Communities Strategy and updated emission inventory methodologies for various source categories.

Similar to the 2007 AQMP, the 2012 AQMP was based on assumptions provided by both CARB and SCAG in the latest available EMFAC model for the most recent motor vehicle and demographics information, respectively. The air quality levels projected in the 2012 AQMP are based on several assumptions. For example, the 2012 AQMP has assumed that development associated with general plans, specific plans, residential projects, and wastewater facilities will be constructed in accordance with population growth projections identified by SCAG in its 2012 RTP. The 2012 AQMP also has assumed that such development projects will implement strategies to reduce emissions generated during the construction and operational phases of development. The Project's consistency with the 2012 AQMP is discussed as follows:

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993) (17). These indicators are discussed below:

- Consistency Criterion No. 1: The proposed 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 the

timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.

Construction Impacts

The violations that Consistency Criterion No. 1 refers to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if localized significance thresholds (LSTs) were exceeded. As evaluated as part of the Project LST analysis (previously presented), the Project's mitigated localized construction-source emissions will not exceed applicable LSTs, and a less than significant impact is expected. Project-generated construction LSTs from the Original Project would not be materially different than what is expected to occur for the proposed Project.

Operational Impacts

As evaluated as part of the Project LST analysis (previously presented), the Project's regional operational-source emissions will not exceed applicable thresholds, and a less than significant impact is expected. Therefore the Project would not conflict with the AQMP according to this criterion for operational activity.

On the basis of the preceding discussion, the Original Project and Proposed Project are determined to be consistent with the first criterion.

- Consistency Criterion No. 2: The Project will not exceed the assumptions in the AQMP based on the years of Project build-out phase.

Construction and Operational Impacts

The 2012 Air Quality Management Plan (AQMP) demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the Southern California Association of Governments (SCAG), which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the City of Wildomar General Plan is considered to be consistent with the AQMP. Although the Original Project was approved by the County, in order for it to be approved, state law requires the Project to be consistent with the County General Plan, so this impact is assumed to be equivalent under both the Original Project and Proposed Project.

AQMP Consistency Conclusion

The Original Project and the Proposed Project would not result in or cause NAAQS or CAAQS violations. The Project's land use designation for the subject site does not materially affect the uses allowed or their development intensities as reflected in the adopted City General Plan. The Project is therefore considered to be consistent with the AQMP.

3.10 POTENTIAL IMPACTS TO SENSITIVE RECEPTORS

The potential impact of Project-generated air pollutant emissions at sensitive receptors has also been considered. Sensitive receptors can include uses such as long term health care facilities,

rehabilitation centers, and retirement homes. Residences, schools, playgrounds, child care centers, and athletic facilities can also be considered as sensitive receptors.

Results of the LST analysis indicate that the Project will not exceed the SCAQMD localized significance thresholds during construction (after mitigation). Therefore sensitive receptors would not be subject to a significant air quality impact during Project construction.

Results of the LST analysis indicate that the Project will not exceed the SCAQMD localized significance thresholds during operational activity. The proposed Project would not result in a CO “hotspot” as a result of Project related traffic during ongoing operations, nor would the Project result in a significant adverse health impact as discussed in Section 3.8. Thus a less than significant impact to sensitive receptors during operational activity is expected for both the Original Project and the Proposed Project.

3.11 ODORS

The potential for the Project to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

The Project does not contain land uses typically associated with emitting objectionable odors. Potential odor sources associated with the proposed Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed Project’s (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction and is thus considered less than significant. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the City’s solid waste regulations. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project construction and operations would be less than significant and no mitigation is required. Project-generated odors from the Original Project would not be materially different than what is expected to occur for the proposed Project.

3.12 CUMULATIVE IMPACTS

The Project area is designated as an extreme non-attainment area for ozone, and a non-attainment area for PM₁₀ and PM_{2.5}.

Construction Impacts

The Project-specific evaluation of emissions presented in the preceding analysis demonstrates that prior to application of appropriate mitigation measures, Project construction-source air pollutant emissions will result in exceedances of regional thresholds of VOCs. However after implementation of the appropriate mitigation measures, project construction-source emission would be considered less than significant.

It is assumed that the Original Project would generate an equivalent level of air quality emissions from construction activity since the construction would not be materially different than that for the Proposed Project. Thus, cumulative impacts for both the Original Project and the Proposed Project would be the same.

Operational Impacts

Project operational-source emissions will not exceed applicable SCAQMD regional thresholds. Per SCAQMD significance guidance, these impacts at the Project level are also considered less than significant. VOC and NO_x emissions are ozone precursors. Project operational-source VOC and NO_x emissions would not contribute considerably to existing ozone non-attainment conditions within the Basin. This is a cumulatively less than significant impact persisting over the life of the Project.

It is assumed that the Original Project would generate an equivalent level of air quality emissions from operational activity since the operations would not be materially different than that for the Proposed Project. Thus, cumulative impacts for both the Original Project and the Proposed Project would be the same.

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5 CERTIFICATION

The contents of this air study report represent an accurate depiction of the environmental impacts associated with the proposed Tentative Tract Map No. 32535 Project. The information contained in this air quality impact assessment report is based on the best available data at the time of preparation. If you have any questions, please contact me directly at (949) 660-1994 ext. 217.

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AEP – Association of Environmental Planners
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ASTM – American Society for Testing and Materials

PROFESSIONAL CERTIFICATIONS

Environmental Site Assessment – American Society for Testing and Materials • June, 2013
Planned Communities and Urban Infill – Urban Land Institute • June, 2011
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APPENDIX 3.1:
CALEEMOD EMISSIONS MODEL OUTPUTS