RESOURCE MANAGEMENT AGENCY

5961 SOUTH MOONEY BLVD
VISALIA, CA 93277
PHONE (559) 624-7000
FAX (559) 730-2653

Aaron R. Bock — Economic Development and Planning
Reed Schenke — Public Works
Sherman Dix — Fiscal Services

TECHNICAL MEMORANDUM

AIR QUALITY AND GREENHOUSE GASES

DATE: December 10, 2019

TO: Hector Guerra, Chief Environmental Planner

FROM: Jessica Willis, Planner IV

SUBJECT: Air Quality and Greenhouse Gas Assessments for the Dunn Asphalt and Concrete Batch Plant (SCH# 2019011039)

PROJECT DESCRIPTION

The Applicant is seeking to operate an asphalt and concrete batch plant (including concrete recycling) at 7763 Avenue 280 (just west of the City of Visalia) which is located along the south side of Avenue 280, west of State Route 99 (SR 99) and east of Road 76, in an unincorporated area of Tulare County (see Figures 1 to 3). The Applicant is pursuing a Special Use Permit (PSP 18-049) through Tulare County for the following: 1) permanent establishment of a hot-mix asphalt (HMA) batch plant that would produce 150,000 tons of HMA per year on the proposed site; 2) recycling of 30,000 tons of concrete and asphalt per year to be crushed into recycled base on the proposed site (reclaimed asphalt pavement (RAP) plant); and 3) permanent establishment of a concrete batch plant that would produce 100,000 cubic yards (or approximately 200,000 tons) of concrete per year on the proposed site.

When operational, the proposed Project would utilize approximately 15-20 employees and include an approximate 1,000 square foot office. The Applicant is proposing to operate Monday-Friday between 6:00 a.m. to 4:00 p.m., and 7:00 a.m. to 12:00 p.m. (noon) on Saturdays. Depending upon demand, summer hours may begin earlier than 6:00 a.m. Site access will be provided via one main driveway connecting to the south side of Avenue 280 approximately 1,000 feet east of Road 76. A majority of the trips will occur outside of peak hour times (i.e., between 7:00 a.m. and 9:00 a.m. (estimated at 20% of total trips per day), and between 4:00 and 6:00 p.m. (estimated at 10% of total trips per day).[1]

PURPOSE AND NEED FOR ASSESSMENT

This document is intended to assist County of Tulare (County) Resource Management Agency (RMA) staff in the preparation of the Air Quality and Greenhouse Gas chapters of the Environmental Impact Report (EIR) being prepared for the proposed Dunn Asphalt and Concrete

[1] *"Traffic Impact Study, Proposed Concrete and Asphalt Batch Plant Avenue 280 West of State Route 99 Tulare County, California"* (TIS) report September 2018. Table 4. Page 7. Prepared by consultant Peters Engineering Group and included in Appendix "F" of this DEIR.

Batch Plant (Project). The assessments have been conducted within the context of the California Environmental Quality Act (CEQA, California Public Resources Code Sections 21000, et seq.) and are intended to provide the County with sufficient detail regarding potential impacts of Project implementation and to identify mitigation measures, if necessary, to reduce potentially significant impacts.

Figure 1: Regional Vicinity

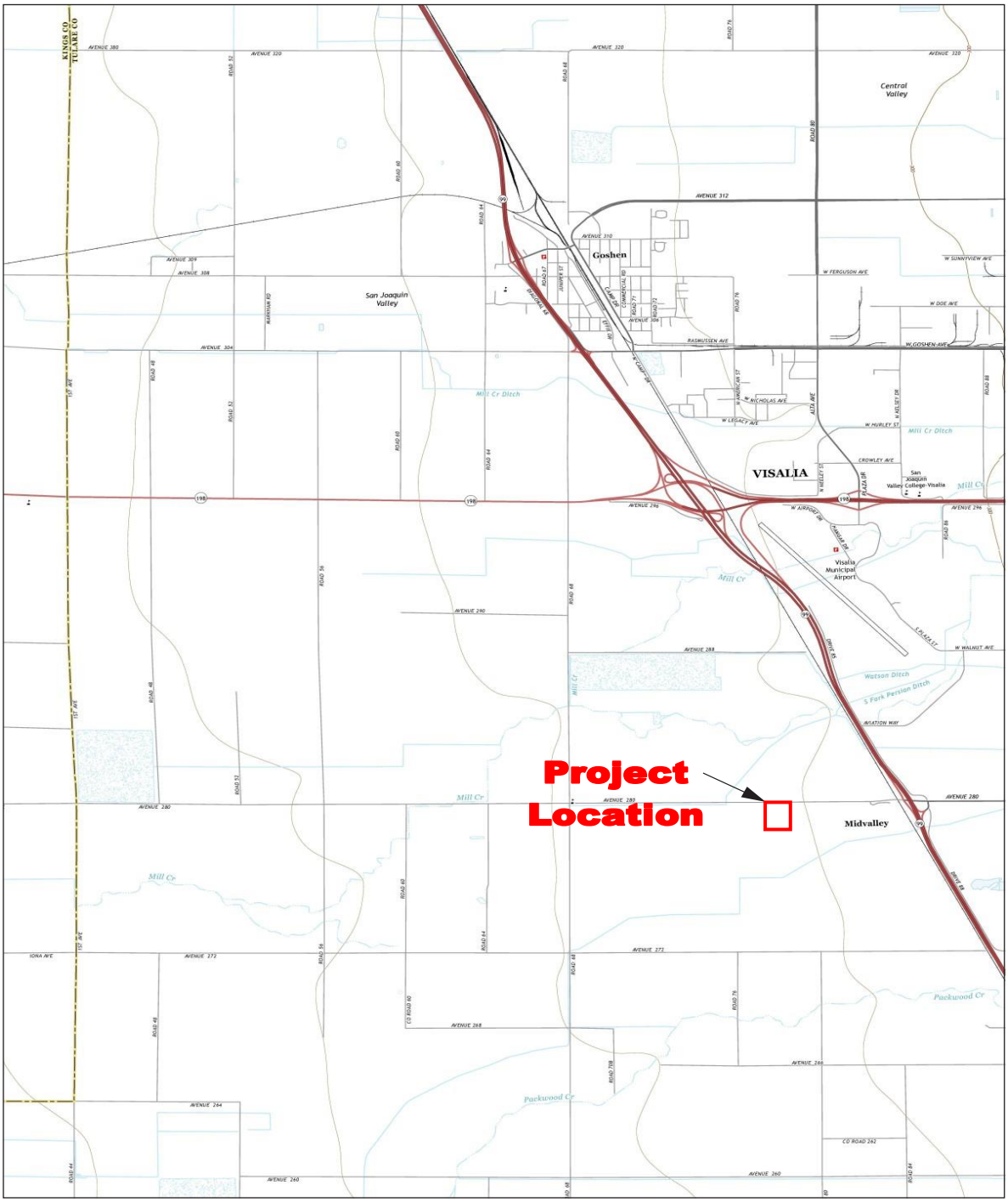


Figure 2: Project Location

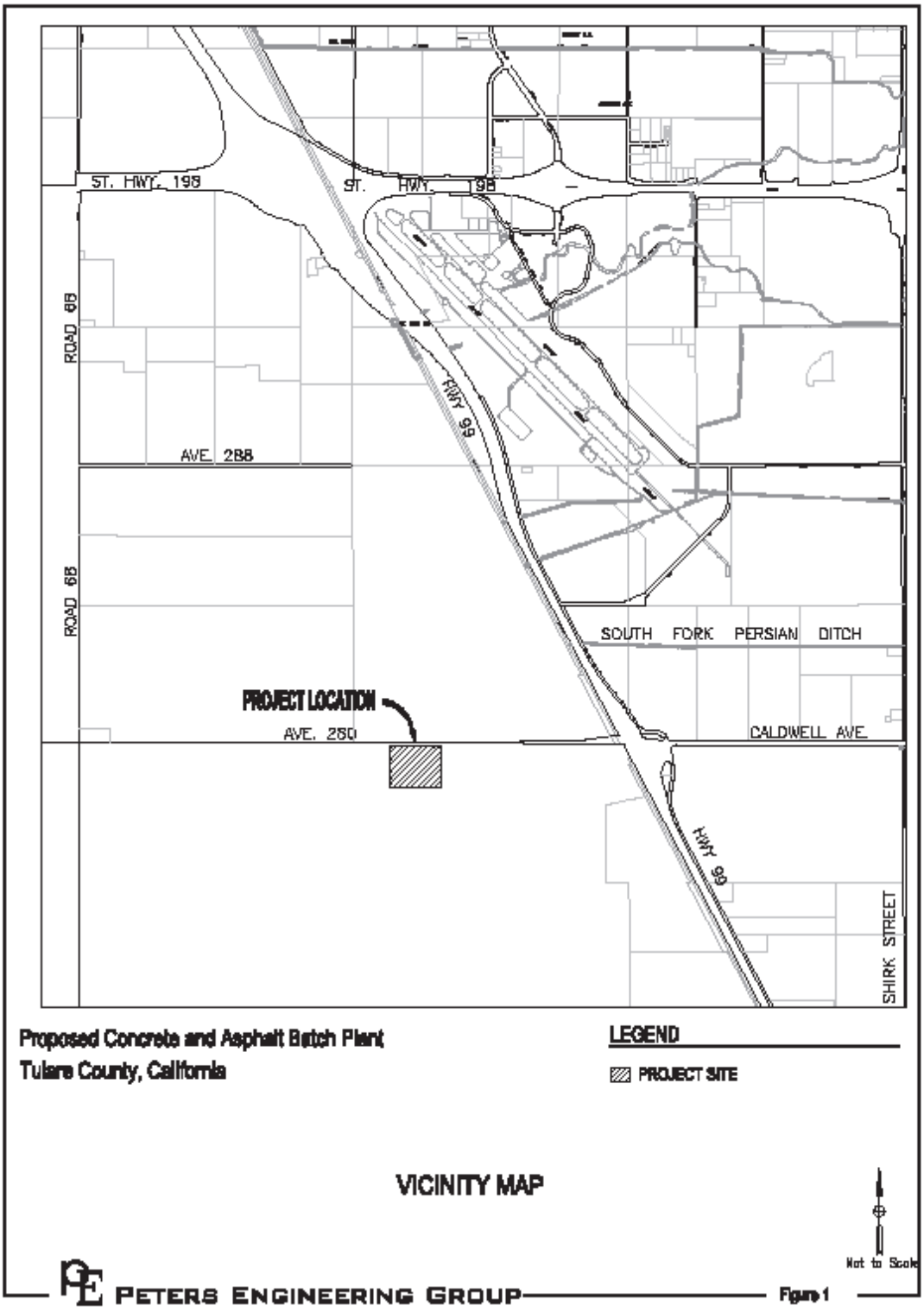
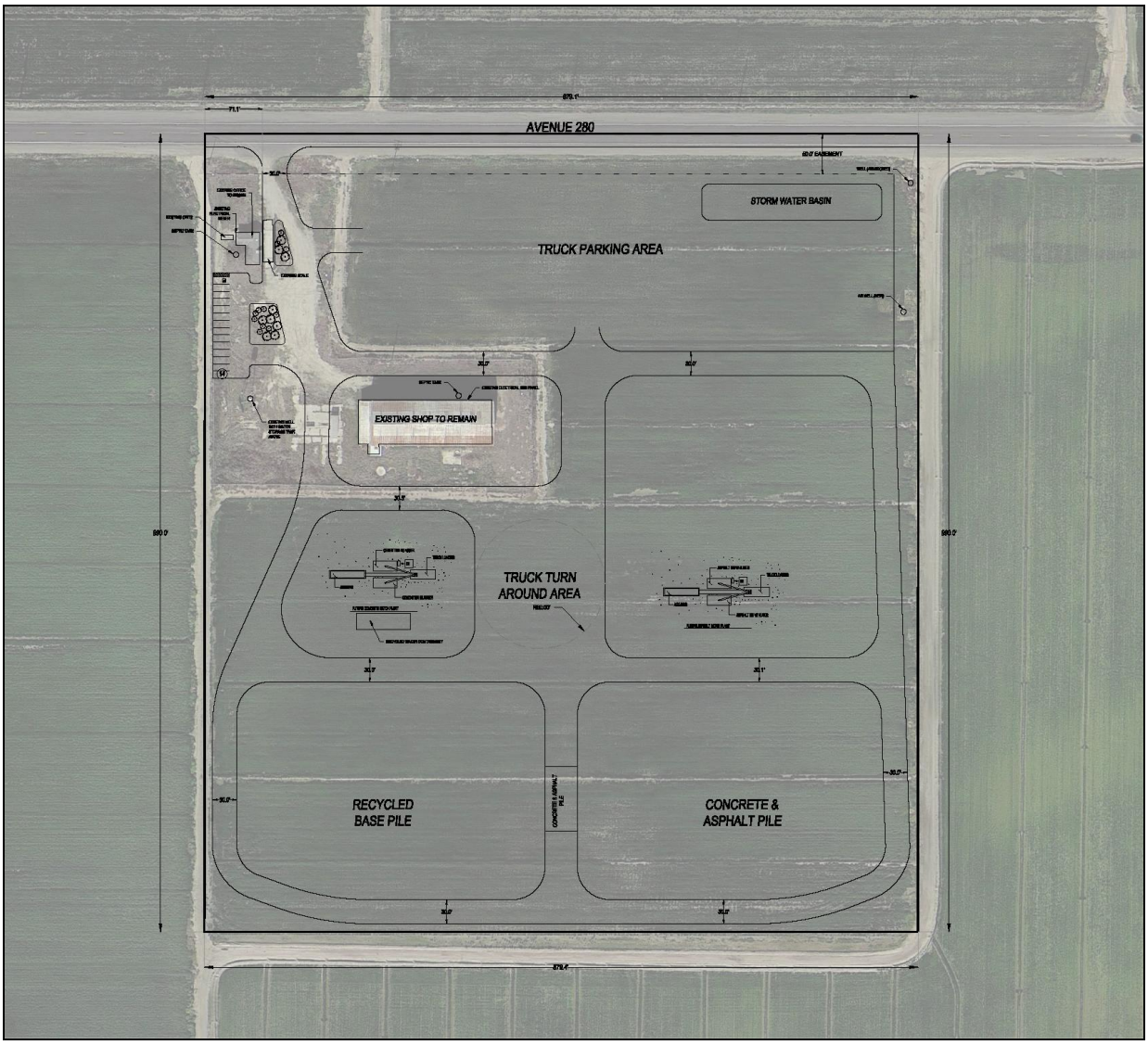


Figure 3: Aerial Site Plan



Air Quality Assessment

The air quality assessment provided in this document was prepared to evaluate whether the air pollutant emissions generated from implementation of the Project would cause significant impacts to air quality and nuisance odor or health risks to nearby receptors. The estimated emissions are compared to federal and state ambient air quality standards (AAQS) and the thresholds of significance established by the San Joaquin Valley Unified Air Pollution Control District (Air District). The methodology for the air quality assessment follows Air District recommendations for quantification of emissions and evaluation of potential impacts as provided in their guidance document *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI), adopted March 19, 2015.[2]

Greenhouse Gas Assessment

The greenhouse gas (GHG) assessment provided in this document was prepared to evaluate whether the estimated GHG emissions generated from the implementation of the Project would cause significant impacts on global climate change. The methodology follows Air District recommendations for quantification of GHG emissions and evaluation of potential impacts on global climate change as provided in the GAMAQI, as well as their guidance and policy documents *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Project under CEQA* (Guidance for Agencies) and *District Policy—Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency* (Air District Policy), adopted December 17, 2009.[3,4]

Emissions Analyses

The Project will include construction and operational emissions. On-site construction activities include site preparation, grading, building construction (installation of the HMA batch plant, RAP plant, and concrete batch plant), paving, and architectural coatings. Off-site construction activities include construction equipment and product hauling and construction employee travel trips. Operational emissions include both permitted and non-permitted equipment and activities. On-site operational activities include the operation of the HMA batch plant, RAP plant, and concrete batch plant. Off-site operational activities include transport of raw material from the source to the site, transport of finished product to end users, and employee travel trips.

Consultant Alta Environmental prepared emissions calculations for the Project's on-site emissions sources, including processing equipment, mobile sources (on-site vehicle traffic), and stockpiles. These analyses are provided in Appendix A of the DEIR and include the Authority to Construct (ACT) applications prepared for the HMA plant, RAP plant, and concrete plant, the Health Risk Assessment (HRA) prepared for the facility, and a determination of the applicability of an Ambient

[2] Air District. Guidance for Assessing and Mitigating Air Quality Impacts (GAMAQI). March 19, 2015. Accessed November 2019 at: http://www.valleyair.org/transportation/GAMAQI_3-19-15.pdf.

[3] Air District. Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Project under CEQA (Guidance for Agencies). December 17, 2009. Accessed November 2019 at: https://www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf..

[4] Air District. District Policy — Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency (Air District Policy). Accessed November 2019 at: https://www.valleyair.org/Programs/CCAP/12-17-09/2%20CCAP%20-%20FINAL%20District%20Policy%20CEQA%20GHG%20-%20Dec%2017%202009.pdf.

Air Quality Analysis (AAQA). RMA staff prepared emissions calculation for the Project's off-site vehicle emissions, including employee trips, raw material transport, and final product sales.

Construction of the HMA, RAP, and concrete batch plants will result in the generation of emissions. Construction-related emissions were estimated using CalEEMod Version 2016.3.2. Construction is expected to take approximately one year with no demolition planned. Default assumptions were used for all inputs, except construction phase duration was changed to match the expected project schedule.[5]

Operation of the HMA, RAP, and concrete batch plants will result in the generation of emissions. Operation-related emissions were assessed based on a 312-day working year (6 days per week, 52 weeks per year), with exception of the stockpiles which are assessed based on a 365-day working year.[6]

Table 1 identifies construction-related activities and **Table 2** identifies operational activities.

Table 1. Construction-related Activities	
Activity	# of Days
Site Preparation	10
Grading	30
Building Construction	174
Paving	20
Architectural Coating	20
Haul Trips	254
Employee Trips	254
Source: Alta Environmental. Health Risk Assessment. Attachment 2, Section 3.0 Construction Detail.	

Table 2. Operational Activities and Vehicle Trips	
Source	**No. of Trips**
HMA Plant	
Asphalt Dryer	---
Oil Heater	---
Oil Storage Tanks	---
Silo Filling and Loadout	See HMA Trucks
RAP Cold Feed	---
Oil Delivery Trucks	222
Propane Delivery Trucks	41
Aggregate (sand/gravel) Delivery Trucks	4,800
HMA Trucks (finished product)	6,000
Concrete Batch Plant	
Cement Silo	---
Fly Ash Silo	---
Truck Loading	See Ready Mix Trucks
Aggregate (sand/gravel) Delivery Trucks	6,400
Cement & Fly Ash Delivery Trucks	1,120

[5] "*Health Risk Assessment"* (HRA) report. November 7, 2019. Page 4. Prepared by consultant Alta Engineering and included in Appendix "A" of this DEIR.

[6] Ibid. Attachment 1.

Table 2. Operational Activities and Vehicle Trips	
Ready Mix Concrete Delivery Trucks (finished product)	10,000
RAP Plant	
RAP Processing	---
Recycled Material End Dumps	1,023
Recycled Material Delivery Trucks	625
Recycled Base Trucks (finished product)	1,200
Other	
Stockpiles	---
Fuel Trucks (for on-site equipment)	26
Outside Services	250
Other Materials/Services	250
Employee Trips	4,680
Sources: Alta Environmental, Authority to Construct Applications; and Project-specific detail supplied by Applicant	

SIGNIFICANCE THRESHOLDS

CEQA defines a significant effect on the environment as a "substantial, or potentially substantial, adverse change in the environment," while the CEQA Guidelines define a significant effect on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project."[7] To determine if a project would have a significant impact on air quality and climate change, the type, level, and impact of criteria pollutant and GHG emissions generated by the project must be evaluated. To determine if a project would have a significant impact on energy resources, project-related energy consumption must be evaluated. Appendix G of the CEQA Guidelines provides the criteria (as Checklist Items) for evaluating potential impacts on the environment. CEQA Guidelines allow for the establishment of significance thresholds to assist lead agencies in determining whether a project may cause a significant impact.[8] The CEQA Guidelines criteria for air quality, greenhouse gas, and energy resources, as well as the Air District's significance thresholds and guidance for evaluation of criteria air pollutant and GHG emissions are provided below.

Air Quality Thresholds

Air Quality Plans

The Air District has established thresholds of significance for criteria pollutant emissions. These thresholds are based on District New Source Review (NSR) offset requirements for stationary sources. "Stationary sources in the District are subject to some of the toughest regulatory requirements in the nation. Emission reductions achieved through implementation of District offset requirements are a major component of the District's air quality plans. Thus, projects with emissions below the thresholds of significance for criteria pollutants would be determined to "Not conflict or obstruct implementation of the District's air quality plan"."[9]

[7] CEQA § 21068 and CEQA Guidelines § 15382.
[8] CEQA Guidelines § 15064 and § 15064.7
[9] Air District, GAMAQI. Section 7.12. Page 65.

The Air District has three sets of significance thresholds based on the source of the emissions. According to the GAMAQI, "The District identifies thresholds that separate a project's short-term emissions from its long-term emissions. The short-term emissions are mainly related to the construction phase of a project and are recognized to be short in duration. The long-term emissions are mainly related to the activities that will occur indefinitely as a result of project operations."[10]

Long-term (operational) emissions are further separated into permitted and non-permitted equipment and activities. Stationary (permitted) sources that comply or will comply with Air District rules and regulations are generally not considered to have a significant air quality impact. Specifically, the GAMAQI states, "District Regulation II ensures that stationary source emissions will be reduced or mitigated to below the District's significance thresholds… District implementation of New Source Review (NSR) ensures that there is no net increase in emissions above specified thresholds from New and Modified Stationary Sources for all nonattainment pollutants and their precursors. Furthermore, in general, permitted sources emitting more than the NSR Offset Thresholds for any criteria pollutant must offset all emission increases in excess of the thresholds…."[11]

The Air District's significance thresholds are provided in **Table 3**.

Table 3. Air District Criteria Pollutant Significance Thresholds

Pollutant/ Precursor	Construction Emissions	Operational Emissions	
		Permitted Equipment and Activities	Non- Permitted Equipment and Activities
	Emissions (tpy)	Emissions (tpy)	Emissions (tpy)
CO	100	100	100
NOx	10	10	10
ROG	10	10	10
SOx	27	27	27
PM_{10}	15	15	15
$PM_{2.5}$	15	15	15

Source: Air District, GAMAQI, Table 2, page 80; and http://www.valleyair.org/transportation/0714-GAMAQI-Criteria-Pollutant-Thresholds-of-Significance.pdf, accessed November 2019.

Air Quality Violations

"Determination of whether project emissions would violate any ambient air quality standard is largely a function of air quality dispersion modeling. If project emissions would not exceed State and Federal ambient air quality standards at the project's property boundaries, the project would be considered to not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The need to perform an air quality dispersion modeling analysis for any project (urban development, commercial, or industrial projects) is determined on a case-by-case basis depending on the level of emissions associated with the proposed project. If such modeling is found necessary, the project consultant should check with the District to determine the appropriate model and input data to use in the analysis. Specific information for assessing

[10] Air District, GAMAQI. Section 8.1. Page 75
[11] Air District. GAMAQI. Section 8.2.1. Page 76.

significance, including screening tools and modeling guidance is available on-line at the District's website www.valleyair.org."[12]

"The thresholds of significance for Ambient Air Quality are based on the California Ambient Air Quality Standard (CAAQS) and National Ambient Air Quality Standard (NAAQS). A project would be considered to have a significant impact if its emissions are predicted to cause or contribute to a violation of an ambient air quality standard by exceeding any of the following:

1. Any of the CAAQS, or
2. Any of the NAAQS, and if available, the associated Significant Impact Level (SIL)."[13]

Table 4 provides the California and National Ambient Air Quality Standards.

"The District ISR rule exempts small development projects (see Table 4 [of the GAMAQI]) from project-specific mitigation requirements. The District performed extensive analysis to identify small projects for which additional mitigation is not feasible. For instance, the exemptions include small residential housing developments of less than 50 units and commercial developments of less than 2,000 square feet. All projects on the exemption list emit less than 2 tons per year of either PM10 or NOx, which is substantially lower than the District's 10-ton per year significance thresholds. Furthermore, as the tailpipe emissions from motor vehicles continue to decline, these projects will emit even less today than was estimated in 2005 when this rule was adopted. In addition, two tons per year is expected to result in daily emissions of less than the 100 lbs./day screening level for either NOx or PM10 that the District has concluded that projects under the ISR exemption thresholds will have a less than significant impact on air quality. Consequently, projects below ISR applicability thresholds are not expected to exceed the thresholds of significance for criteria pollutants emissions (see Section 8.3 [of the GAMAQI]). In addition, projects below the ISR applicability thresholds are not expected to violate any air quality standards or contribute substantially to an existing or projected air quality violation and will not exceed the thresholds of significance for ambient air quality. In this case, the District concludes no emission calculation is needed and no ambient air quality analysis is required."[14]

Table 4. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards	
		Concentration	Primary	Secondary
Ozone (O_3)	1 Hour	0.09 ppm (180 µg/m^3)	---	Same as Primary
	8 Hour	0.070 ppm (137 µg/m^3)	0.070 ppm* (137 µg/m^3)	
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m^3	150 µg/m^3	Same as Primary
	Annual Arithmetic Mean	20 µg/m^3	---	
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	---	35 µg/m^3	Same as Primary
	Annual Arithmetic Mean	12 µg/m^3	12.0 µg/m^3	15.0 µg/m^3
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	---

[12] Air District. GAMAQI. Section 7.13. Page 65.
[13] Air District. GAMAQI. Section 8.4. Page 90.
[14] Air District. GAMAQI. Section 8.4.4. Page 95.

Table 4. Ambient Air Quality Standards				
Pollutant	**Averaging Time**	**California Standards**	**National Standards**	
		Concentration	**Primary**	**Secondary**
	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)	1 Hour	0.18 ppm (339 µg /m^3)	100 ppb (188 µg/m^3)	Same as Primary
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	
Sulfur Dioxide (SO_2)	1 Hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)	---
	3 Hour	---	---	0.5 ppm (1300 µg/m^3)
	24 Hour	0.04 ppm (105 µg/m^3)	0.14 ppm (for certain areas)	---
	Annual Arithmetic Mean	---	0.030 ppm (for certain areas)	---
Lead	30 Day Average	1.5 µg/m^3	---	---
	Calendar Quarter	---	1.5 µg/m^3 (for certain areas)	Same as Primary
	Rolling 3-Month Average	---	0.15 µg/m^3	
Visibility Reducing Particles	8 Hour	Extinction of 0.23/km; visibility of 10 miles or more	**No National Standards**	
Sulfates	24 Hour	25 µg/m^3		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m^3)		

** The standard at the time of the GAMAQI was 0.075 ppm; the standard presented here was finalized on October 26, 2015.*
Abbreviations: ppm = parts per million; mg/m^3 = milligram per cubic meter; µg/m^3 = micrograms per cubic meter.
Sources: Air District, GAMAQI, Table 3, page 91; ARB, http://www.arb.ca.gov/research/aaqs/aaqs2.pdf, accessed November 2019.

Table 5 provides the Air District's ambient air quality analysis (AAQA) screening levels for development projects. For projects that exceed the screening thresholds identified in **Table 5**, the Air District provides further guidance on how to evaluate the 100 pound per day screening level in their guidance document *Ambient Air Quality Analysis Project Daily Emissions Assessment*.[15]

Table 5. AAQA Screening Levels for Development Project	
Development Project Type	**Space / Size**
Residential	50 dwelling units
Commercial	2,000 square feet
Light Industrial	25,000 square feet
Heavy Industrial	100,000 square feet
Medical Office	20,000 square feet
General Office	39,000 square feet
Educational	9,000 square feet

[15] Air District. *Ambient Air Quality Analysis Project Daily Emissions Assessment* (Guidance document). Accessed November 2019 at: http://www.valleyair.org/transportation/CEQA%20Rules/Ambient-Air-Quality-Analysis-Project-Daily-Emissions-Assessment.pdf.

Table 5. AAQA Screening Levels for Development Project	
Development Project Type	**Space / Size**
Governmental	10,000 square feet
Recreational	20,000 square feet
Transportation / Transit	Construction exhaust emissions equal or exceeding 2.0 tons NOx or 2.0 tons PM_{10}
Source: Air District. GAMAQI. Table 4. Page 96.	

Cumulative Increase in Emissions

"By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development. Future attainment of State and Federal ambient air quality standards is a function of successful implementation of the District's attainment plans. Consequently, the District's application of thresholds of significance for criteria pollutants is relevant to the determination of whether a project's individual emissions would have a cumulatively significant impact on air quality. A Lead Agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program, including, but not limited to an air quality attainment or maintenance plan that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located [CCR §15064(h)(3)]. Thus, if project specific emissions exceed the thresholds of significance for criteria pollutants the project would be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the District is in non-attainment under applicable Federal or State ambient air quality standards. This does not imply that if the project is below all such significance thresholds, it cannot be cumulatively significant."[16]

Table 6 provides the San Joaquin Valley Air Basin attainment status for federal and state ambient air quality standards.

Table 6. San Joaquin Valley Attainment Status		
Pollutant	**Designation**	
	Federal Standards	**State Standards**
Ozone—1-hour	No Federal Standard	Nonattainment/Severe
Ozone—8-hour	Nonattainment/Extreme	Nonattainment
PM_{10}	Attainment	Nonattainment
$PM_{2.5}$	Nonattainment	Nonattainment
Carbon monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen dioxide	Attainment/Unclassified	Attainment
Sulfur dioxide	Attainment/Unclassified	Attainment
Lead (Particulate)	No Designation/Classification	Attainment
Hydrogen sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility-reducing particles	No Federal Standard	Unclassified

[16] Air District. GAMAQI. Section 7.14. Pages 65-66.

Table 6. San Joaquin Valley Attainment Status		
Vinyl chloride	No Federal Standard	Attainment
Source: Air District, http://www.valleyair.org/aqinfo/attainment.htm. Accessed November 2019.		

Exposure Risks

The location of a project is a major factor in determining whether the project will result in localized air quality impacts. The potential for adverse air quality impacts increases as the distance between the source of emissions and receptors decreases. From a health risk perspective, there are two (2) categories of projects that have the potential to cause long-term health risks impacts:

- Type A Projects: Land use projects that will place new toxic sources in the vicinity of existing receptors. This category includes sources of toxic emissions such as gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, freeways and high traffic roads, and other stationary sources that emit toxic substances.
- Type B Projects: Land use projects that will place new receptors in the vicinity of existing toxic sources. This category includes residential, commercial, and institutional developments proposed in the vicinity of existing sources such as stationary sources, freeways and high traffic roads, rail yards, and warehouse distribution centers.[17]

"Various tools already exist to perform a screening analysis from stationary sources impacting receptors (Type A projects) as developed for the AB2588 Hot Spots and air district permitting programs. Screening tools may include prioritization charts, AERSCREEN and various spreadsheets. For projects being impacted by existing sources (Type B projects), one screening tool is contained in the ARB Handbook: *Air Quality and Land Use Handbook: A Community Health Perspective*. The document includes a table entitled "*Recommendations on Siting New Sensitive Land Uses Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical Facilities*" with recommended buffer distances associated with various types of common sources. If a proposed project is located within an established buffer distance to any of the listed sources, a health risk screening and/or assessment should be performed to assess risk to potential sensitive receptors. These guidelines are intended only for projects that are impacted by a single source. Another useful tool is the CAPCOA Guidance Document: *Health Risk Assessments for Proposed Land Use Projects*. CAPCOA prepared the guidance to assist Lead Agencies in complying with CEQA requirements. The guidance document describes when and how a health risk assessment should be prepared and what to do with the results."[18]

Table 7 presents the Air District's and ARB's siting recommendations for projects proposing sensitive land uses.

[17] Air District. GAMAQI. Section 6.5. Page 44.
[18] Air District. GAMAQI. Section 6.5. Page 45.

Table 7. ARB Recommendations on Siting New Sensitive Land Uses	
Source Category	**Advisory Recommendations**
Freeways and High-Traffic Roads	Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.
Refineries	Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloroethylene	Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district. Do not site new sensitive land uses in the same building with perchloroethylene dry cleaning operations.
Gasoline Dispensing Facilities	Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.
Sources: *Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective. Table 1-1. Accessed November 2019 at: https://www.arb.ca.gov/ch/handbook.pdf.* *California Air Pollution Control Officers Association, Health Risk Assessments for Proposes Land Use Projects. Table 2. Accessed November 2019 at: http://www.valleyair.org/transportation/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf.*	

"Determination of whether project emissions would expose sensitive receptors to substantial pollutant concentrations is a function of assessing potential health risks. Sensitive receptors are facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. When evaluating whether a development proposal has the potential to result in localized impacts, Lead Agency staff need to consider the nature of the air pollutant emissions, the proximity between the emitting facility and sensitive receptors, the direction of prevailing winds, and local topography. Lead Agencies are encouraged to use the screening tools for Toxic Air Contaminant presented in section 6.5 (Potential Land Use Conflicts and Exposure of Sensitive Receptors [pages 44 – 45 of the GAMAQI]) to identify potential conflicts between land use and sensitive receptors and include the result of their analysis in the referral document."[19]

Nuisance Odors

[19] Air District, GAMAQI. Section 7.15. Page 66.

"Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact. Rather, the District recommends that odor analyses strive to fully disclose all pertinent information. The intensity of an odor source's operations and its proximity to sensitive receptors influences the potential significance of odor emissions. The District has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley. These are presented in Chapter 8 [of the GAMAQI] along with a reasonable distance from the source within which, the degree of odors could possibly be significant."[20]

Two situations create a potential for odor impact. The first occurs when a new odor source is located near an existing receptor. The second occurs when a new receptor locates near an existing source of odor. "An analysis of potential odor impacts should be conducted for the following two situations:

1. Generators – projects that would potentially generate odorous emissions proposed to locate near existing sensitive receptors or other land uses where people may congregate, and
2. Receivers – residential or other sensitive receptor projects or other projects built for the intent of attracting people locating near existing odor sources." [21]

"The intensity of an odor source's operations and its proximity to sensitive receptors influences the potential significance of odor emissions. The District has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley Air Basin. These are presented in Table 6 (Screening Levels For Potential Odor Sources) [of the GAMAQI] along with a reasonable distance from the source within which, the degree of odors could possibly be significant. Table 6 (Screening Levels for Potential Odor Sources) [of the GAMAQI], can be used as a screening tool to qualitatively assess a project's potential to adversely affect area receptors. This list of facilities is not all-inclusive. The Lead Agency should evaluate facilities not included in the table or projects separated by greater distances if warranted by local conditions or special circumstances. If the proposed project would result in sensitive receptors being located closer than the screening level distances, a more detailed analysis should be provided."[22]

Table 8 presents the Air District's screening levels for potential nuisance odor sources.

Table 8. Air District Screening Levels for Potential Odor Sources

Odor Generator / Type of Facility	Distance
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile

[20] Air District. GAMAQI. Section 7.16, Pages 66-67.
[21] Air District. GAMAQI. Section 8.6, Page 102.
[22] Air District. GAMAQI. Section 8.6, Pages 102-103.

Table 8. Air District Screening Levels for Potential Odor Sources	
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g., auto body shop)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile
Sources: Air District. GAMAQI. Table 6, Page 103. Accessed November 2019at: http://www.valleyair.org/transportation/GAMAQI-2015/GAMAQI-Criteria-Pollutant-Thresholds-of-Odors.pdf..	

Greenhouse Gases Thresholds

Assembly Bill 32 (AB 32)

The California State Legislature adopted AB 32 on September 27, 2006. AB 32 focuses on reducing GHG emissions to 1990 levels by the year 2020 and to 80% below 1990 levels by the year 2050. Pursuant to the requirements in AB 32, the Air Resources Board (ARB) adopted the Climate Change Scoping Plan (2008 Scoping Plan), which outlines actions recommended to obtain that goal. The 2008 Scoping Plan calls for an "ambitious but achievable" reduction in California's GHG emissions, cutting emissions approximately 29% from BAU emission levels projected for 2020, or about 10% from 2008 levels. On a per capita basis, that means reducing annual emissions of 14 tons of carbon dioxide for every man, woman, and child in California down to about 10 tons per person by 2020. [23]

"On December 17, 2009, the District's Governing Board adopted the District Policy: *Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*. The District's Governing Board also approved the guidance document: *Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New Projects Under CEQA*. In support of the policy and guidance document, District staff prepared a staff report: *Addressing Greenhouse Gas Emissions Under the California Environmental Quality Act*. These documents adopted in December of 2009 continue to be the relevant policies to address GHG emissions under CEQA. As these documents may be modified under a separate process, the latest versions should be referenced to determine the District's current guidance at the time of analyzing a particular project." [24]

"It is widely recognized that no single project could generate enough GHG emissions to noticeably change the global climate temperature. However, the combination of GHG emissions from past, present and future projects could contribute substantially to global climate change. Thus, project specific GHG emissions should be evaluated in terms of whether or not they would result in a cumulatively significant impact on global climate change. GHG emissions, and their associated contribution to climate change, are inherently a cumulative impact issue. Therefore, project-level impacts of GHG emissions are treated as one-in-the-same as cumulative impacts.

[23] ARB. Climate Change Scoping Plan. Pages ES-1. Accessed November 2019 at: http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm, and https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf.

[24] Air District. GAMAQI. Section 8.9. Page 110.

In summary, the staff report evaluates different approaches for assessing significance of GHG emission impacts. As presented in the report, District staff reviewed the relevant scientific information and concluded that the existing science is inadequate to support quantification of the extent to which project specific GHG emissions would impact global climate features such as average air temperature, average rainfall, or average annual snow pack. In other words, the District was not able to determine a specific quantitative level of GHG emissions increase, above which a project would have a significant impact on the environment, and below which would have an insignificant impact. This is readily understood, when one considers that global climate change is the result of the sum total of GHG emissions, both manmade and natural that occurred in the past; that is occurring now; and will occur in the future.

In the absence of scientific evidence supporting establishment of a numerical threshold, the District policy applies performance based standards to assess project-specific GHG emission impacts on global climate change. The determination is founded on the principal that projects whose emissions have been reduced or mitigated consistent with the California Global Warming Solutions Act of 2006, commonly referred to as "AB 32", should be considered to have a less than significant impact on global climate change. For a detailed discussion of the District's establishment of thresholds of significance for GHG emissions, and the District's application of said thresholds, the reader is referred to the above referenced staff report, District Policy, and District Guidance documents." [25]

"As presented in Figure 6 (Process of Determining Significance of Greenhouse Gas Emissions) [of the GAMAQI], the policy provides for a tiered approach in assessing significance of project specific GHG emission increases.

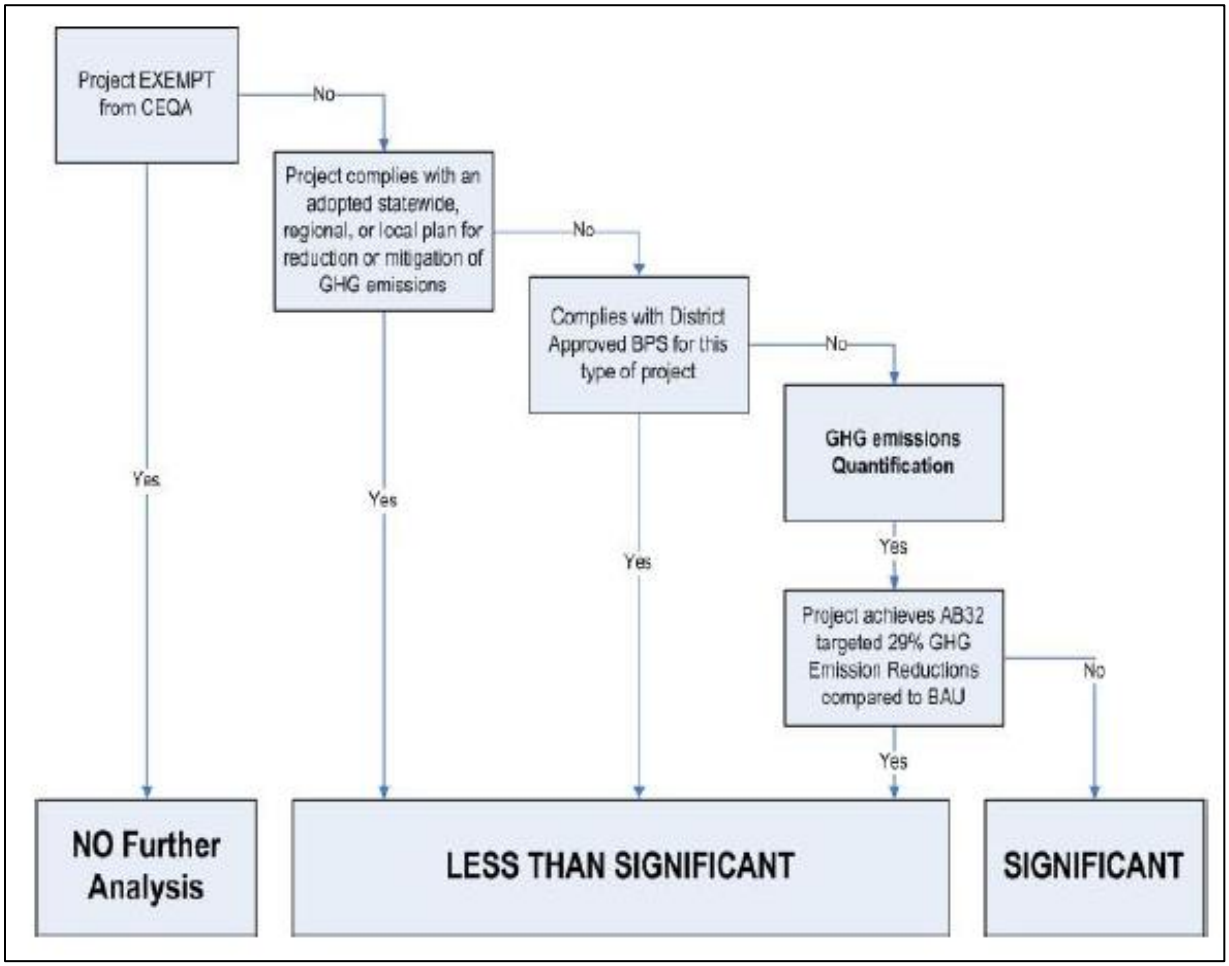
- Projects complying with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions within the geographic area in which the project is located would be determined to have a less than significant individual and cumulative impact for GHG emissions. Such plans or programs must be specified in law or approved by the Lead Agency with jurisdiction over the affected resource and supported by a CEQA compliant environmental review document adopted by the Lead Agency. Projects complying with an approved GHG emission reduction plan or GHG mitigation program would not be required to implement Best Performance Standards (BPS).
- Projects implementing BPS would not require quantification of project specific GHG emissions. Consistent with CEQA Guideline, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.
- Projects not implementing BPS would require quantification of project specific GHG emissions and demonstration that project specific GHG emissions would be reduced or mitigated by at least 29%, compared to Business as Usual (BAU), including GHG emission reductions achieved since the 2002-2004 baseline period, consistent with GHG emission reduction targets established in ARB's AB 32 Scoping Plan. Projects achieving at least a 29% GHG emission reduction compared to BAU would be determined to have a less than significant individual and cumulative impact for GHG.

[25] Ibid. Section 8.9. 111-112.

The District guidance for development projects also relies on the use of BPS. For development projects, BPS includes project design elements, land use decisions, and technologies that reduce GHG emissions. Projects implementing any combination of BPS, and/or demonstrating a total 29 percent reduction in GHG emissions from business-as-usual (BAU), would be determined to have a less than cumulatively significant impact on global climate change." [26]

Figure 4 provides a visual summary of the Air District's process for determining significance of project-related GHG emissions.

Figure 4. Process of Determining Significance of Greenhouse Gas Emissions



Source: Air District, GAMAQI, Figure 6, Page 113

The Air District's *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Project under CEQA* states, "Projects implementing Best Performance Standards in accordance with this guidance would be determined to have a less than significant individual and cumulative impact on global climate change and would not require project specific quantification of GHG emissions. Projects exempt from the requirements of CEQA, and projects complying with an approved GHG emission reduction plan or mitigation program would also be determined to have a less than significant individual or cumulative impact. Such plans or programs must be

[26] Op. Cit. Section 8.9.1.

specified in law or adopted by the public agency with jurisdiction over the affected resources and have a certified final CEQA document. Projects not implementing BPS would require quantification of project specific GHG emissions. To be determined to have a less than significant individual and cumulative impact on global climate changes, such projects must be determined to have reduced or mitigated GHG emissions by 29%, consistent with GHG emission reduction targets established in ARB's AB 32 Scoping Plan. Furthermore, quantification of GHG emissions would be expected for all projects for which the lead agency has determined that an Environmental Impact Report is required, regardless of whether the project incorporates Best Performance Standards." [27]

"If total GHG emissions reductions measures add up to 29% or more, are enforceable, and are required as a part of the development's approval process, the project achieves the Best Performance Standard (BPS) for the respective type of development project. Thus, the GHG emissions from the development project would be determined to have a less than individually and cumulatively significant impact on global climate change for CEQA purposes." [28]

"By definition, BPS for development projects is achieving a project-by-project 29% reduction in GHG emissions, compared to BAU. Thus, it is reasonable to conclude that Lead Agencies implementing the proposed *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* threshold will achieve an overall reduction in GHG emissions consistent with AB 32 emission reduction targets…" [29]

Senate Bill 32 (SB32)

The California State Legislature adopted SB 32 on September 8, 2016. SB 32 focuses on reducing GHG emissions to 40% below 1990 levels by the year 2030. Pursuant to the requirements in SB 32, the ARB adopted the Climate Change Scoping Plan Update (2017 Scoping Plan), which outlines actions recommended to obtain that goal. ARB recommends statewide targets of no more than six (6) metric tons CO_2e per capita by 2030 and no more than two (2) metric tons CO_2e per capita by 2050. [30]

The Air District's guidance document was adopted to provide a basis for lead agencies to establish significance thresholds consistent with ARB's 2008 Scoping Plan. The Air District currently does not have a recommendation for establishing thresholds or assessing significance consistent with the reduction requirements established in ARB's 2017 Scoping Plan Update, which requires a 33.2% reduction from BAU to achieve the 2030 target.

The Tulare County Climate Action Plan (CAP) serves as a guiding document for County actions to reduce GHG emissions and adapt to the potential effects of climate change. The CAP is an implementation measure of the Tulare County General Plan 2030 Update, which provides the supporting framework for development within the County to produce fewer GHG emissions during General Plan buildout. The CAP builds on the General Plan's framework with more specific actions that will be applied to achieve emission reduction targets consistent with State legislation

[27] Air District. Guidance for Valley Land-use Agencies. Page 4.
[28] Air District. Guidance for Valley Land-use Agencies Pages 7-8.
[29] Air District. Guidance for Valley Land-use Agencies Page 8.
[30] ARB. California's 2017 Climate Change Scoping Plan. Page 99 Accessed November 2019at: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

The General Plan fulfills many sustainability and GHG reduction objectives at the program level. Projects implementing the General Plan will comply with these policies resulting in long-term benefits to GHG reductions that will help the County achieve the CAP reduction targets. The CAP identifies the policies from the various General Plan elements that promote more efficient development and reduce travel and energy consumption.[31] CEQA allows the use of a qualitative approach for assessing greenhouse gas impacts for areas with a CAP.

IMPACT EVALUATION

AIR QUALITY IMPACTS

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Project Impact Analysis: ***Significant and Unavoidable Impact***

The Project is located within the San Joaquin Valley Air Basin and, as such, it is compelled to comply with applicable air quality plans, rules, permits, regulations, thresholds, etc., as determined by the Air District (which is a Responsible Agency in regards to this Project). The CEQA Guidelines indicate that a significant impact would occur if the project would conflict with or obstruct implementation of the applicable Air Quality Plan (AQP). The Air District has determined that projects with emissions below the thresholds of significance for criteria pollutants would "Not conflict or obstruct implementation of the District's air quality plan." These thresholds are presented in **Table 3**. The Air District has also determined that a project would be considered to have a significant impact if the emissions are predicted to cause or contribute to a violation of ambient air quality standards. An Ambient Air Quality Analysis (AAQA) would be required if the project size exceeds the screening limits presented in **Table 5** and project emissions are predicted to exceed the AAQA screening threshold of 100 pounds per day.

An additional criterion regarding a project's implementation of AQP control measures was assessed to show specifically how the project helps to implement the AQP. Therefore, this document proposes the following criteria for determining project consistency with the current AQPs:

1. Will the project result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQPs? This measure is determined by comparison to the regional and localized thresholds identified by the District for Regional and Local Air Pollutants.

2. Will the project comply with applicable control measures in the AQPs? The primary control measures applicable to development projects are Regulation VIII—Fugitive PM_{10} Prohibitions and District Rule 2201 (New and Modified Stationary Source Review).

[31] Tulare County, Climate Action Plan 2018 Update (CAP Update), Page 1. Accessed November 2019 at: http://generalplan.co.tulare.ca.us/documents/GP/001Adopted%20Tulare%20County%20General%20Plan%20Materials/220Climate%20Action%20Plan/CLIMATE%20ACTION%20PLAN%202018%20UPDATE.pdf.

Contribution to Air Quality Violations

Emissions Quantification

The Project would result in short-term, temporary construction-related, and long-term operations-related air pollutant emissions. A measure for determining if the Project is consistent with the air quality plans is if the Project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the air quality plans. Regional air quality impacts and attainment of standards are the result of the cumulative impacts of all emission sources within the air basin. Individual projects are generally not large enough to contribute measurably to an existing violation of air quality standards. Therefore, the cumulative impact of the Project is based on its cumulative contribution. Because of the region's nonattainment status for ozone, $PM_{2.5}$, and PM_{10}, if Project generated emissions of either of the ozone precursor pollutants (ROG and NOx), PM_{10}, or $PM_{2.5}$ would exceed the Air District's significance thresholds, then the Project would be considered to contribute to violations of the applicable standards and conflict with the attainment plans.

Consultant Alta Environmental prepared emissions calculations for the Project's construction-related activities and on-site operation-related stationary and mobile source emissions (included in Appendix "A" of the DEIR). The Authority to Construct applications provide quantification of emissions from the Project's stationary sources, including the equipment and stockpiles associated with the HMA plant, RAP plant, and concrete batch plant. The Health Risk Assessment also includes quantification of the stationary source emissions, but also includes quantification of construction-related emissions. The Ambient Air Quality Analysis Determination provides quantification of the average daily emissions for both construction- and operation-related activities. Project emissions were estimated assuming construction would take one year and the facility would operate 312 days per year (6 days a week for 52 weeks a year) at the maximum annual permitted capacity, except for stockpiles which were estimated using operation of 365 days per year.

RMA Staff prepared emissions calculations for the operation-related off-site mobile source emissions (see Attachment "A" of this memo). The emissions calculations were based on the proposed maximum annual permitted capacity and the projected annual Project trip generation (see Table 3 of the Traffic Impact Study, included in Appendix "F" of the DEIR). Consistent with the proposed development schedule with operations beginning in 2021, EMFAC emissions factors for 2021 were used to quantify emissions. Given the nature of the Project (manufacturing of construction-related materials) and that it is impossible to identify specific destinations of final product sales, Vehicle Miles Traveled (VMT) has been generalized for likely market areas (expressed as round-trip distances) as follows: 30 miles for local area; 68 miles for the Porterville area; 36 miles to the Fresno County line; and 74 miles to the Kern County Line. Approximately 85.8% of the Project's vehicle trips are attributable to heavy-duty (MHD and HHD) trucks used in the transport of raw material and final product. Approximately 1.4% of trips are attributable to outside service vehicles (LDT1, LDT2) and other materials and services (MDV). The remaining approximate 12.8% of the trips are attributable to employee vehicles (LDA, LDT1, LDT2, MDV).

Table 9 provides the Project's construction-related emissions. **Table 10** provides the Project's operation-related emissions from permitted sources. **Table 11** provides the Project's on- and off-site operation-related emissions from non-permitted sources.

Table 9. Project Construction Emissions (tons/year)

Activity/Source	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Site Preparation	0.0209	0.2125	0.1114	0.0002	0.1024	0.0601
Grading	0.0686	0.7543	0.4921	0.0010	0.1363	0.0817
Building Construction	0.3857	3.0340	2.8602	0.0085	0.5109	0.2089
Paving	0.0355	0.1413	0.1528	0.0003	0.0094	0.0074
Architectural Coating	0.4998	0.0194	0.0449	0.0001	0.0090	0.0032
Construction Total	***1.0104***	***4.1615***	***3.6614***	***0.0100***	***0.7680***	***0.3613***
Significance Threshold	10	10	100	27	15	15
Exceeds Threshold?	***No***	***No***	***No***	***No***	***No***	***No***

Note: Construction Year is 2020. Emissions include mobile source emissions.
Source: Alta Environmental. Health Risk Assessment. Attachment 2, CalEEMod Emission Estimates.

Table 10. Project Permitted Operational Emissions (tons/year)

Source	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
HMA Plant						
RAP Cold Feed	---	---	---	---	0.0693	0.0693
Asphalt Dryer	0.8155	1.5369	9.1589	14.4283	1.7250	1.7250
Oil Heater	0.0121	0.0228	0.1357	0.2138	0.0130	0.0130
Oil Storage Tanks	0.511	---	---	---	---	---
Silo Filling / Loadout	1.2263	---	0.1898	---	0.0412	0.0412
Stockpiles	---	---	---	----	1.2375	1.2375
Concrete Batch Plant						
Concrete Batching	---	---	---	---	1.4418	1.4418
Stockpiles	---	---	---	---	1.6521	1.6521
RAP Plant						
RAP Processing	---	---	---	---	0.0231	0.0231
Stockpiles	---	---	---	---	0.3218	0.3218
Permitted Total	***2.5649***	***1.5597***	***9.4844***	***14.6421***	***6.5248***	***6.5248***
Significance Threshold	10	10	100	27	15	15
Exceeds Threshold?	***No***	***No***	***No***	***No***	***No***	***No***

Operation Year is 2021.
Source: Alta Environmental, Authority to Construct Application – Hot Mix Asphalt Plant, Pages 7-12.
Alta Environmental, Authority to Construct Application – Concrete Batch Plant, Pages 8-10.
Alta Environmental, Authority to Construct Application – Concrete and Asphalt Recycling Plant, Pages 8-10.
Alta Environmental, Ambient Air Quality Analysis Determination
Alta Environmental, Health Risk Assessment

Table 11. Project Non-Permitted Operational Emissions (tons/year)

Source	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
On-Site Non-Permitted Sources[1]						
On-Site Truck Exhaust	0.096	1.177	0.979	0.003	0.008	0.008
On-Site Truck Fugitive Dust	---	---	---	---	0.207	0.207
Off-Road Equipment	0.113	0.243	2.23	0.000	0.008	0.007
Off-Site Non-Permitted Sources[2]						
Aggregate Material Delivery Trucks	0.1256	4.1652	0.5087	0.0159	0.0690	0.0660
Oil Delivery Trucks	0.0025	0.0826	0.0101	0.0003	0.0014	0.0013
Propane Delivery Trucks	0.0005	0.0152	0.0019	0.0001	0.0003	0.0002
HMA Trucks	0.0673	2.2313	0.2725	0.0085	0.0370	0.0354
Cement & Fly Ash Delivery Trucks	0.0126	0.4165	0.0509	0.0016	0.0069	0.0066

Table 11. Project Non-Permitted Operational Emissions (tons/year)						
Source	**ROG**	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Ready Mix Concrete Trucks	0.1121	3.7189	0.4542	0.0142	0.0616	0.0590
Recycled Material End Dumps	0.0115	0.3804	0.0465	0.0015	0.0063	0.0060
Recycled Material Delivery Trucks	0.0154	0.2225	0.0410	0.0007	0.0060	0.0057
Recycled Base Trucks	0.0135	0.4463	0.0545	0.0017	0.0074	0.0071
Fuel Trucks (for on-site equipment)	0.0003	0.0097	0.0012	0.0000	0.0002	0.0002
Outside Services	0.0008	0.0035	0.0355	0.0001	0.0001	0.0000
Other Materials/Services	0.0006	0.0028	0.0252	0.0001	0.0000	0.0000
Employee Trips	0.0093	0.0419	0.4321	0.0013	0.0006	0.0006
Non-Permitted Total	***0.5807***	***13.1568***	***5.1433***	***0.0489***	***0.4197***	***0.4102***
Significance Threshold	10	10	100	27	15	15
Exceeds Threshold?	***No***	***Yes***	***No***	***No***	***No***	***No***
Operation Year is 2021. 1 Source: Alta Environmental. Ambient Air Quality Analysis Determination and Health Risk Analysis. 2 Source: Attachment A of this memo, Annual Off-Site Emissions Table.						

As presented in **Table 9**, emissions of ROG, NOx, CO, SO_2, PM_{10}, and $PM_{2.5}$ associated with the construction of the Project would not exceed the Air District's significance thresholds; as such, the Project would not conflict with or obstruct implementation of the applicable AQP. Therefore, construction-related activities will have a ***Less Than Significant Impact*** related to this Checklist Item.

As presented in **Table 10**, emissions of ROG, NOx, CO, SO_2, PM_{10}, and $PM_{2.5}$ associated with the permitted equipment and on-site activities (stationary sources) of the Project would not exceed the Air District's significance thresholds; as such, the Project would not conflict with or obstruct implementation of the applicable AQP. Therefore, permitted operation-related activities will have a ***Less Than Significant Impact*** related to this Checklist Item.

As presented in **Table 11**, emissions of ROG, NOx, CO, SO_2, PM_{10}, and $PM_{2.5}$ associated with the on-site non-permitted equipment and activities (mobile sources) of the Project would not exceed the Air District's significance thresholds. As presented in **Table 11**, NOx emissions associated with the off-site non-permitted equipment and activities (mobile source emissions from transport of raw and final product, services and deliveries, and employee trips) will exceed the Air District's significance thresholds; emissions of ROG, CO, SO_2, PM_{10}, and $PM_{2.5}$ from these sources will not exceed the thresholds.

The Project is subject to Air District rules and regulations including, Regulation VIII (Fugitive PM10 Prohibition), Rules 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits, Rule 4001 (New Source Performance Standards), Rule 4101 (Visible Emissions), Rule 4102 (Public Nuisance), Rule 4309 (Dryers, Dehydrators, and Ovens), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). According to the Air District's GAMAQI, "Project subject to District rules and regulation would reduce its impacts on air quality through compliance with regulatory requirements."[32] Regarding Rule 2201, the GAMAQI states, "NSR is a major component of the

[32] Air District. GAMAQI, Section 8.2, Page 75.

District's attainment strategy as it relates to growth. It applies to new and modified stationary sources of air pollution. NSR provides mechanisms, including emission trade-offs, by which Authorities to Construct such sources may be granted, without interfering with the attainment or maintenance of Ambient Air Quality Standards. District implementation of NSR ensures that there is no net increase in emissions above specified thresholds from new and modified Stationary Sources for all nonattainment pollutants and their precursors."[33]

Mobile source emissions are under the jurisdiction of the ARB. The Applicant's on-site equipment and heavy-duty truck fleet (used to transport aggregate to the site from the Porterville plant) are currently ARB-compliant and will continue to comply with all applicable ARB rules and regulations. The Applicant does not own the heavy-duty trucks that will be used to transport finished product for sale. As truck registration is dependent upon compliance with ARB's truck regulations, it is reasonable to assume that all heavy-duty trucks accessing the Project site comply, and will continue to comply, with ARB regulations. As truck emissions are expected to become cleaner in the future and all heavy-duty truck fleets must have Year 2010 engine models by 2023, the Project-related NOx emissions are also expected to decrease with time.

The emissions inventories included in the Tulare County General Plan are consistent with and included in the AQP. The Project is consistent with the growth projections in the General Plan and will implement all applicable General Plan policies, including those that require compliance with Air District regulation and encourage emission reducing project design features.

As previously discussed, he Project will comply with all federal, state, and Air District rules and regulation, and is consistent with the Tulare County General Plan and the State SIP. However, the Air District's GAMAQI states, "the District recommends that mobile source (both exhaust emissions and fugitive dust emissions) be quantified separate from other non-permitted sources or activities. However, emissions from all non-permitted equipment and activities are summed by criteria pollutant when determining significance. A project would be determined to have a significant, long-term impact on air quality if any criteria pollutant resulting from non-permitted equipment and activities exceeds its respective threshold of significance."[34] As such, Project-related off-site mobile source NOx emissions would result in a ***Significant and Unavoidable Project-specific Impact*** to Air Quality.

Ambient Air Quality Analysis

Pursuant to Air District recommendations and following Air District procedures, consultant Alta Environmental evaluated the Project's daily emissions to determine whether an AAQA would be warranted for the Project. Project daily emissions were estimated assuming construction would take one year and the facility would operate 312 days per year (6 days a week for 52 weeks a year) at maximum annual permitted capacity, except for stockpiles which were estimated using operation of 365 days per year.

Table 12 provides the Project's daily construction-related emissions. **Table 13** provides the Project's daily operation-related emissions from permitted source. **Table 14** provides the Project's daily operation-related emissions from non-permitted sources.

[33] Air District. GAMAQI, Section 8.3.1, Page 81.
[34] Air District. GAMAQI, Section 8.3.7, Page 89.

Table 12. Daily Construction Emissions (pounds/day)						
Construction Phase	**ROG**	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Site Preparation	4.19	42.50	22.28	0.04	20.49	12.02
Grading	4.57	50.29	32.81	0.06	9.08	5.45
Building Construction	4.43	34.87	32.88	0.10	5.87	2.40
Paving	3.55	14.13	15.28	0.03	0.94	0.74
Architectural Coating	49.98	1.94	4.49	0.01	0.90	0.32
Max Daily Construction	***49.98***	***50.29***	***32.88***	***0.10***	***20.49***	***12.02***
Exceeds 100 lb/day?	**No**	**No**	**No**	**No**	**No**	**No**
Source: Alta Environmental. Ambient Air Quality Analysis Determination						

Table 13. Daily Permitted Operational Emissions (pounds/day)						
Source	**ROG**	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
Concrete Batch Plant	---	---	---	---	9.23	9.23
RAP Processing Plant	---	---	---	---	0.15	0.15
HMA Dryer	5.26	9.87	58.72	92.50	11.09	11.09
HMA Oil Heater	0.08	3.81	0.96	1.37	0.08	0.08
HMA Cold Feed RAP	---	---	---	---	0.36	0.36
HMA Silo Filling	5.86	---	0.57	---	0.01	0.01
HMA Silo Loadout	2.00	---	0.65	---	0.25	0.25
HMA Oil Tanks	2.80	---	---	---	---	---
Total Daily Operations	***15.99***	***13.69***	***60.89***	***93.87***	***21.17***	***21.17***
Exceeds 100 lb/day?	**No**	**No**	**No**	**No**	**No**	**No**
Source: Alta Environmental. Ambient Air Quality Analysis Determination						

Table 14. Daily Non-Permitted Operational Emissions (pounds/day)[1]						
Source	**ROG**	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
HMA Storage Pile	---	---	---	---	6.79	6.79
Concrete Storage Pile	---	---	---	---	9.04	9.04
RAP Storage Pile	---	---	---	---	1.75	1.75
Truck Exhaust (on-site)	0.62	7.55	6.28	0.02	0.05	0.05
Truck Fugitive Dust (on-site)	---	---	---	---	1.33	1.33
Off Road Equipment	0.73	1.56	14.29	---	0.05	0.05
Vehicle Exhaust (off-site trucks and employee trips)[2]	2.38	75.24	12.40	0.29	1.26	1.21
Total Daily Operations	***3.72***	***84.34***	***32.97***	***0.31***	***20.28***	***20.28***
Exceeds 100 lb/day?	**No**	**No**	**No**	**No**	**No**	**No**
1 Source: Alta Environmental. Ambient Air Quality Analysis Determination 2 Source: Attachment "A" of this memo, Table 3						

As presented in **Tables 12-14**, daily emissions of ROG, NOx, CO, SO_2, PM_{10}, and $PM_{2.5}$ associated with the construction and operation of the Project would not exceed the Air District's AAQA screening thresholds of 100 pound per day. Total daily operation-related emissions (permitted and non-permitted) are 19.71 lb/day ROG, 98.03 lb/day NOx, 93.86 lb/day CO, 94.18 lb/day SO_2, 41.45 lb/day PM_{10}, and 41.45 lb/day $PM_{2.5}$ which are also below the Air District's thresholds. As such, the Project will not conflict with or obstruct implementation of the applicable AQP. Therefore, the Project will have a ***Less Than Significant Project-specific Impact*** related to this Checklist Item.

Compliance with Applicable Air Quality Plan Control Measures

The AQP contains a number of control measures, which are enforceable requirements through the adoption of rules and regulations. As previously noted, the Project is subject to Air District rules and regulations including, Regulation VIII (Fugitive PM10 Prohibition), Rules 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits, Rule 4001 (New Source Performance Standards), Rule 4101 (Visible Emissions), Rule 4102 (Public Nuisance), Rule 4309 (Dryers, Dehydrators, and Ovens), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations).

Regulation VIII—Fugitive PM_{10} Prohibitions is a control measure that is one of the main strategies from the 2006 PM_{10} Plan for reducing the PM_{10} emissions that are part of fugitive dust. The Air District adopted its Regulation VIII on October 21, 1993 and amended on August 8, 2004 to implement Best Available Control Measures (BACM). This Regulation consists of a series of emission reduction rules consistent with the PM_{10} Maintenance Plan. These rules are designed to reduce PM_{10} emissions (predominantly dust/dirt) generated by human activity, including construction and demolition activities, road construction, bulk materials storage, paved and unpaved roads, carryout and track-out, etc.

Rules 2201 (New and Modified Stationary Source Review) applies to all new stationary sources which are subject to Air District Permit Requirements. Rule 2201 requires stationary source projects that exceed certain thresholds to install Best Available Control Technology (BACT) and to obtain emission offsets to ensure that growth in stationary sources on a cumulative basis will not result in an increase in emissions. The Project will comply with Air District permitting requirements under Rule 2201.

The Project will comply with all applicable Air District rules and regulations. Therefore, the Project complies with this criterion and would not conflict with or obstruct implementation of the applicable AQP.

The 2016 Plan for the 2008 8-Hour Ozone Standard was adopted in June 2016. The 2015 Plan for the 1997 $PM_{2.5}$ Standard was adopted in April 2015 and the 2016 Moderate Area Plan for the 2012 $PM_{2.5}$ Standard was adopted in September 2016. The plans assume growth would occur at rates projected by the State and regional population forecasts and would result in the continued need for rock and aggregate for construction projects. Therefore, the Project complies with this criterion and would not conflict with or obstruct implementation of the applicable air quality attainment plan.

The Project will comply with all applicable Air District rules and regulations including BACT requirements. The Project will provide necessary construction materials for future growth as projected by the State. As such, the Project is in compliance with AQP control measures and would not conflict with or obstruct implementation of the applicable AQP. The Project will have a ***Less Than Significant Project-specific Impact*** related to this Checklist Item.

Cumulative Impact Analysis: ***Significant and Unavoidable Cumulative Impact***

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. The Project would be considered to have a significant cumulative impact on air quality if Project-specific impacts are determined to be significant. As previously discussed, Project construction-related criteria pollutant emissions would not exceed Air District significance thresholds. Project

operation-related ROG, CO, SO_2, PM_{10} and $PM_{2.5}$ emissions also would not exceed Air District significant thresholds. While permitted operation-related NOx emissions do not exceed the significance threshold, NOx emissions from off-site mobile sources do exceed the threshold. The Project will comply with all applicable federal, State and Air District rules and regulations and will not result in daily emissions that would exceed 100 pound per day; as such, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. However, because mobile source NOx emissions are considered to have a Significant and Unavoidable Project-specific Impact, the Project's impacts are also considered cumulatively significant. Therefore, the Project will result in a ***Significant and Unavoidable Cumulative Impact*** related this Checklist Item.

Mitigation: ***No Additional Measures beyond Compliance with Existing Regulation Required.***

The Project is subject to Air District permitting requirements and various Air District rules and regulations including: Regulation VIII (Fugitive PM10 Prohibition), Rules 2201 (New and Modified Stationary Source Review), Rule 2520 (Federally Mandated Operating Permits, Rule 4001 (New Source Performance Standards), Rule 4101 (Visible Emissions), Rule 4102 (Public Nuisance), Rule 4309 (Dryers, Dehydrators, and Ovens), and Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations). As demonstrated in **Table 10**, the Project's permitted sources will not exceed the Air District's thresholds of significance for any criteria pollutant. As such, mitigation is not required to reduce permitted emissions to a level of less than significant.

As demonstrated in **Table 11**, the Project's non-permitted sources, specifically the heavy-duty truck trips, will exceed the Air District's thresholds of significance for NOx. Mobile source emissions are under the jurisdiction of the ARB. The Applicant's on-site equipment and heavy-duty truck fleet are currently ARB-compliant and will continue to comply with all applicable ARB rules and regulations. The Applicant does not own the heavy-duty trucks that will be used to transport finished product for sale. As truck registration is dependent upon compliance with ARB's truck regulations, it is reasonable to assume that all heavy-duty trucks accessing the Project site comply, and will continue to comply, with ARB regulations. As truck emissions are expected to become cleaner in the future and all heavy-duty truck fleets must have Year 2010 engine models by 2023, the Project-related emissions are also expected to decrease with time.

The emissions inventories included in the Tulare County General Plan are consistent with and included in the AQP. The Project is consistent with the growth projections in the General Plan and will implement all applicable General Plan policies, including those that require compliance with Air District regulation and encourage emission reducing project design features.

As previously discussed, he Project will comply with all federal, state, and Air District rules and regulation, and is consistent with and will implement all applicable policies of Tulare County General Plan. The Applicant does not have control over the heavy-duty vehicles used in transport of final product from the site. Furthermore, as this is a new facility and actual production and sales are speculative at this time, it is unknown if the maximum production capacity will be achieved. As such, feasible mitigation consists of existing rules, regulations, and requirements.

Conclusion: ***Significant and Unavoidable Cumulative Impact***

As previously noted, the Project will not exceed the Air District's thresholds of significance and, as such, will not conflict with or obstruct implementation of the applicable air quality plans. Therefore, ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item will occur.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Project Impact Analysis: ***Significant and Unavoidable Impact***

See Item a), earlier, and Cumulative Impact Analysis, below.

Cumulative Impact Analysis: ***Significant and Unavoidable Impact***

To result in a less than significant cumulative impact, the following three (3) criteria must be true:

1. Regional analysis: emissions of nonattainment pollutants must be below the Air District's regional significance thresholds. This is an approach recommended by the Air District in its GAMAQI.

2. Summary of projections: the project must be consistent with current air quality attainment plans including control measures and regulations. This is an approach consistent with Section 15130(b) of the CEQA Guidelines.

3. Cumulative health impacts: the project must result in less than significant cumulative health effects from the nonattainment pollutants. This approach correlates the significance of the regional analysis with health effects, consistent with the court decision, *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1219-20.

The first criteria used to evaluate potential Project impacts is to determine if the Project's emissions are below the Air District's significance thresholds. As previously discussed in Checklist Item a) "*Contribution to Air Quality Violations*" and demonstrated in **Tables 10 and 11**, the Project's construction-related and permitted operation-related criteria pollutant emissions would not exceed Air District significance thresholds for any criteria pollutant. The Project's non-permitted (mobile source) operation-related ROG, CO, SO_2, PM_{10} and $PM_{2.5}$ emissions also would not exceed Air District significant thresholds; however, NOx emissions from the mobile sources do exceed the threshold. Mobile source emissions are under the jurisdiction of the ARB. The Applicant's on-site equipment and heavy-duty truck fleet are currently ARB-compliant and will continue to comply with all applicable ARB rules and regulations. The Applicant does not own the heavy-duty trucks that will be used to transport finished product for sale. As truck registration is dependent upon compliance with ARB's truck regulations, it is reasonable to assume that all heavy-duty trucks accessing the Project site comply, and will continue to comply, with ARB regulations. As truck emissions are expected to become cleaner in the future and all heavy-duty truck fleets must have Year 2010 engine models by 2023, the Project-related NOx emissions are also expected to decrease with time. The Project will comply with all applicable federal, State and Air District rules and regulations and will not result in daily emissions, from construction activities, permitted

equipment/activities, or non-permitted equipment/activities, that would exceed the AAQA screening threshold of 100 pound per day. As such, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. However, because mobile source NOx emissions exceed the Air District's significance thresholds they are considered to result in Significant Project-specific Impact. As such, the Project's impacts are also considered cumulatively significant. Therefore, the Project will result in a ***Significant and Unavoidable Cumulative Impact*** related this Checklist Item.

The second criteria used to evaluate potential Project impacts is to determine if the Project is consistent with current AQPs including control measures and regulations. In accordance with CEQA Guidelines 15130(b), this part of the analysis of cumulative impacts is based on a summary of projections analysis. This analysis considers the current CEQA Guidelines, which includes the amendments approved by the Natural Resources Agency, effective on December 28, 2018. Under the amended CEQA Guidelines, cumulative impacts may be analyzed using other plans that evaluate relevant cumulative effects. The AQPs describe and evaluate the future projected emissions sources in the San Joaquin Valley Air Basin and set forth a strategy to meet both state and federal Clean Air Act planning requirements and federal ambient air quality standards. The Air District AQP are based on a summary of projections that accounts for projected growth throughout the Air Basin, and the controls needed to achieve ambient air quality standards. In accordance with CEQA Guidelines Section 15064(h)(3), a lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously approved plan or mitigation program. Therefore, the plans are relevant plans for a CEQA cumulative impacts analysis. As discussed in Checklist Item a) "*Compliance with Applicable Air Quality Plan Control Measures"* the Project is consistent with all applicable control measures in the air quality attainment plans. The Project would comply with any District rules and regulations that may pertain to implementation of the AQPs. Therefore, impacts would be less than significant with regard to compliance with applicable rules and regulations. Therefore, according to this criterion, this impact is ***Less Than Significant***.

The third criteria used to evaluate potential Project impacts is to determine if the Project would result in less than significant cumulative health effects from the nonattainment pollutants. In the 5th District Court of Appeal case Sierra Club v. County of Fresno (Friant Ranch, L.P.), the Court found the project EIR deficient because it did not identify specific health related effects resulting from the estimated amount of pollutants generated by the project. The ruling stated that the EIR should give a "sense of the nature and magnitude of the 'health and safety problems' caused by a project's air pollution. The EIR should translate the emission numbers into adverse impacts or to understand why such translation is not possible at this time (and what limited translation is, in fact, possible)."

The standard measure of the severity of impact is the concentration of pollutant in the atmosphere compared to the ambient air quality standard for the pollutant for a specified period of time. The severity of the impact increases with the concentration and the amount of time that people are exposed to the pollutant. The change in health impacts with concentration are described in the Air Quality Index (AQI) tables found on the Environmental Protection Agency's (EPA) AirNow website, and in the "*Air Quality Conditions in Tulare County*" discussion of the DEIR (see AQI Calculator at https://airnow.gov/index.cfm?action=airnow.calculator and Air Quality Index (AQI) Basics at https://www.airnow.gov/index.cfm?action=aqibasics.aqi). The pollutants of concern in the Friant Ranch ruling were regional criteria pollutants ozone, and PM10. It is important to note

that the potential for localized impacts can be addressed through dispersion modeling. The Air District includes screening criteria that if exceeded would require dispersion modeling to determine if project emissions would result in a significant health impact. For this Project, no significant localized health impacts would occur (see the Health Risk Assessment included in Appendix "A" of the EIR). Regional pollutants require more complex modeling as described below.

Ozone concentrations are estimated using regional photochemical models because ozone formation is subject to temperature, inversion strength, sunlight, emissions transport over long distances, dispersion, and the regional nature of the precursor emissions. The emissions from individual projects are too small to produce a measurable change in ozone concentrations—it is the cumulative contribution of emissions from existing and new development that is accounted for in the photochemical model. Ozone concentrations vary widely throughout the day and year even with the same amount of daily emissions. The Air District indicated in an Amicus Brief on Friant Ranch that running the photochemical model with just Friant Ranch emissions (109.5 tons/year NOx) is not likely to yield valid information given the relative scale involved. A copy of the Air District's brief is included in Attachment "B" in this memo. The NOx inventory for the San Joaquin Valley is 224 tons per day in 2019 or 81,760 tons per year. Friant Ranch would result in 0.13 percent increase in NOx emissions. A project emitting at the Air District CEQA threshold of 10 tons per year would result in a 0.01 percent increase in NOx emissions. Most project emissions are generated by motor vehicle travel distributed on regional roadways miles from the project site, and these emissions are not conducive to project-level modeling.

Emissions throughout the San Joaquin Valley are projected to markedly decline in the coming decade. The Air District's 2016 Ozone Plan predicts NOx emissions will decline to 103 tons per day by 2029 or 54 percent from 2019 levels through implementation of control measures included in the plan. This means that ozone health impacts to residents of the San Joaquin Valley will be lower than currently experienced and most areas of the San Joaquin Valley will have attained ozone air quality standards. The plan accounts for growth in population at rates projected by the State of California for the San Joaquin Valley, so only cumulative projects that would exceed regional growth projections would potentially delay attainment and prolong the time and the number of people would experience health impacts. It is unlikely that anyone would experience greater impacts from regional emissions than currently occur. The federal transportation conformity regulation provides a means of ensuring growth in emissions does not exceed emission budgets for each County. Regional Transportation Plans and Regional Transportation Improvement Plans must provide a conformity analysis based on the latest planning assumptions that demonstrates that budgets will be not be exceeded. If budgets are exceeded, the San Joaquin Valley may be subject to Clean Air Act sanctions until the deficiency is addressed.

Particulate emission impacts can be localized and regional. Particulates can be directly emitted and can be formed in the atmosphere with chemical reactions. Small directly emitted particles such as diesel emissions and other combustion emissions can remain in the atmosphere for a long time and can be transported over long distances. Large particles such as fugitive dust tend to be deposited a short distance from where emitted but can also travel long distances during periods of high winds. Particulates can be washed out of the atmosphere by rain and deposited on surfaces. Secondary particulates formed in the atmosphere such as ammonium nitrate require NOX and ammonia and require low inversion levels, and certain ranges of temperature and humidity to result in substantial concentrations. These complications make modeling project particulate emissions to

determine concentration feasible only for directly emitted particles at receptor locations close to the project site. Regional particulate concentrations are modeled using a gridded inventory (emissions in tons/day are placed within a 4-kilometer, three-dimensional grid to spatially allocate the emissions geographically) and an atmospheric chemistry component is used to simulate the chemical reactions. The model uses relative reduction factors to determine the amount of reductions of each PM component will be needed to attain the air quality standards on the days with the conditions most favorable to high particulate concentrations. Only very large projects with emissions well in excess of Air District thresholds of significance would produce sufficient emissions to determine a project's individual contribution to the particulate concentration and health impact.

The Air Basin is in nonattainment for ozone, PM10 (State only), and PM2.5, which means that the background levels of those pollutants are at times higher than the ambient air quality standards. The air quality standards were set to protect public health, including the health of sensitive individuals (such as children, the elderly, and the infirm). Therefore, when the concentration of those pollutants exceeds the standard, it is likely that some sensitive individuals in the population would experience health effects that are described in the EPA's AQI Calculator tables. However, the health effects are a factor of the dose-response curve. Concentration of the pollutant in the air (dose), the length of time exposed, and the response of the individual are factors involved in the severity and nature of health impacts. If a significant health impact results from project emissions, it does not mean that 100 percent of the population would experience health effects. The "*Air Quality Monitoring Summary"* table provided in the "*Air Quality Conditions in Tulare County*" discussion of the DEIR relates the pollutant concentration experienced by residents using air quality data for the nearest air monitoring station to the health impacts ascribed to those concentrations by the EPA AQI. This provides a more detailed look at the actual impacts currently experienced by residents near the project site.

Since the Air Basin is nonattainment for ozone, PM_{10}, and $PM_{2.5}$, it is considered to have an existing significant cumulative health impact without the Project. When this occurs, the analysis considers whether the Project's contribution to the existing violation of air quality standards is cumulatively considerable. The Air District's regional thresholds for NOx, VOC, PM_{10}, or $PM_{2.5}$ are applied as cumulative contribution thresholds. Projects that exceed the regional thresholds would have a cumulatively considerable health impact. As shown in **Table 11**, the regional analysis of operational emissions indicates that the Project's NOx emissions from heavy-duty truck emissions would exceed the District's significance thresholds if the facility operates at maximum permitted capacity in its opening year (2021). However, maximum permitted capacity presents the worst-case emissions scenario. As truck emissions are expected to become cleaner in the future and all heavy-duty truck fleets must have Year 2010 engine models by 2023, the Project-related NOx emissions are also expected to decrease with time. Furthermore, the Air District's AQPs predict that nonattainment pollutant emissions will continue to decline each year as regulations adopted to reduce these emissions are implemented, accounting for growth projected for the region. Therefore, the cumulative health impact will also decline even with the Project's emission contribution. Therefore, according to this criterion, this impact is ***Less Than Significant***

Mitigation: ***No Additional Measures beyond Compliance with Existing Regulation Required.***

As discussed in Checklist Item a), the Project will comply with all federal, state, and Air District rules and regulation, and is consistent with and will implement all applicable policies of Tulare County General Plan. Mobile source emissions are under the jurisdiction of the ARB. The Applicant's fleet is compliant with current ARB truck regulations and will continue to comply with all applicable ARB rules and regulations. The Applicant does not have control over the heavy-duty vehicles used in transport of final product from the site. As truck registration is dependent upon compliance with ARB's truck regulations, it is reasonable to assume that all heavy-duty trucks accessing the Project site comply, and will continue to comply, with ARB regulations. As truck emissions are expected to become cleaner in the future and all heavy-duty truck fleets must have Year 2010 engine models by 2023, the Project-related NOx emissions are also expected to decrease with time. Furthermore, as this is a new facility and actual production and sales are speculative at this time, it is unknown if the maximum production capacity will be achieved. As such, feasible mitigation consists of existing rules, regulations, and requirements.

Conclusion: ***Significant and Unavoidable Impact***

As previously noted, Project non-permitted operation-related (mobile source) NOx emissions exceed the Air District's significance thresholds. The Project will be required to implement all applicable General Plan policies and to comply with all applicable Air District rules and regulations. However, the Applicant does not own all the trucks that will transport final product from the Project site. Therefore, the Project will have a ***Significant and Unavoidable Cumulative Impact*** related to this Checklist Item.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Project Impact Analysis: ***Less Than Significant Impact***

Sensitive receptors are those individuals who are sensitive to air pollution and include children, the elderly, and persons with pre-existing respiratory or cardiovascular illness. The Air District considers a sensitive receptor to be a location that houses or attracts children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Examples of sensitive receptors include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units.[35]

Project-related TACs/HAPs: The Project has the potential to expose nearby receptors to TAC/HAP emissions during the short-term construction phase and from the ongoing operational activities. Consultant Alta Environmental prepared a Health Risk Assessment (HRA) consistent with San Joaquin Valley Air District protocols which concluded that the Project would not exceed any Air District thresholds for toxic air contaminants (TACs). The HRA is included in Appendix "A" of the DEIR.

As noted in the in the HRA "Operation of a concrete and HMA plant results in the generation of emissions. Specific sources of TACs at the proposed Dunn Facility include: the HMA dryer, asphalt oil storage tanks, cement silos, material transfer points, trucks used to transport material to and from the site, and off-road equipment to move material within the site. In certain cases, sources

[35] Air District. GAMAQI. Page 10.

of TACs will be equipment with pollution control devices, such as baghouses and bin vents. The following sources of TACs were included in this risk assessment.

HMA Plant:
- Asphalt Dryer
- Oil Heater
- Oil Storage Tanks
- Silo Filling and Loadout
- RAP Cold Feed

Concrete Batch Plant:
- Cement Silo
- Fly Ash Silo
- Truck Loading

RAP:
- RAP Processing Plant

Other:
- Truck exhaust, including idling
    - Diesel Particulate Matter (DPM)
- Fugitive dust
    - Vehicle traffic
    - Stockpiles
    - Transfer Points

Detailed emission estimates and calculations are provided in Attachment 1 [of the HRA included in Appendix "A" of the DEIR]."[36]

In addition to estimating emissions from the sources noted above, the Air Dispersion Modeling discussion in the HRA notes, "Air dispersion modeling was performed to estimate ground level concentrations (GLCs) at and beyond the property boundary of the Facility. USEPA's AERMOD executable version 19191 via the BREEZE AERMOD software. Source release parameters were obtained from equipment specifications, published guidance documents, and facility personnel's knowledge of the expected equipment. Source parameters, such as name, location, release height, etc. are provided in Table 1 and Table 2 [of the HRA included in Appendix "A" of the DEIR].

Truck and off-road equipment emissions were modeled as a series of volume sources located along the expected path of travel. Emissions for these sources were divided evenly between the series of volume sources. For construction emissions, the lot was modeled as an area source."[37]

The HRA includes various input factors such as meteorological data, terrain data, model options and receptors as part of its analysis.[38] Using this information Alta Environmental is able to conduct a TAC exposure assessment estimate on receptors. As noted in the HRA, "Air dispersion modeling results (plot [.plt] files) were imported into CARB's HARP software. HARP2 ADMRT software version 19121 was utilized to perform the dose-response assessment and calculate the potential

[36] *"Health Risk Assessment Dunn's Inc. 7763 Avenue 280 Visalia, CA 93277"* (HRA) Page 3. Prepared by Alta Environmental and included in Appendix "A" of the DEIR.
[37] Ibid. 4.
[38] Op. Cit. 4-5

cancer risk and non-cancer health impacts for the various receptors surrounding the proposed Dunn facility. The dose-response assessment and risk calculations were performed in accordance with OEHHA's Risk Assessment Guidelines (OEHHA, 2015) and San Joaquin Valley Air Pollution Control District's (SJVAPCD's) Guidance for Air Dispersion Modeling (SJVAPCD, 2007)."[39] In summary, the exposure assessment includes identification of potential exposed populations, exposure pathways (for residents and off-site workers), and HARP exposure analysis methods and assumptions (for residents and off-site workers).[40]

As noted in the HRA, a dose response assessment was also conducted as, "According to OEHHA, dose-response assessment describes the quantitative relationship between the amount of exposure to a substance (the dose) and the incidence or occurrence of an adverse health impact (the response). Dose-response information for noncancer health effects is used to determine Reference Exposure Levels (RELs). Dose-response information for cancer risks are based on cancer potency factors (OEHHA, 2015). Chronic RELs, 8-hour Chronic RELs, Acute RELs, and cancer potency factors for each pollutant are listed in the OEHHA Guidelines and built into HARP2. These values are periodically updated, and new versions of HARP2 incorporate the changes."[41]

The HRA includes a risk characterization methodology by noting that "Risks are characterized using calculations and methodology contained in the OEHHA Guidelines and built into HARP2. Risk is calculated based on dose, dose-response values (RELs or cancer potency factors), and exposure duration and frequency. For this HRA, all risks were calculated using a Tier 1 approach using OEHHA default values."[42] Carcinogenic Risks, Chronic Non-cancer Hazards, and Acute Non-cancer Hazards were then calculated resulting in the following results noted in the Risk Characterization Results in the HRA:

"Risk results are presented at three locations: The Point of Maximum Impact (PMI), the Maximum Exposed Individual Resident (MEIR), and the Maximum Exposed Individual Worker (MEIW) [see **Tables 15-18**]. The PMI is located on the property boundary, and no receptors are expected to reside there for significant periods of time. Therefore, CEQA significance thresholds of 20 in one million for cancer and 1 for non-cancer HI are assessed at the MEIR and MEIW. The locations of the PMI, MEIR, and MEIW are provided in the following table and shown in Figure 3 [in the HRA]." [43]

Table 15. Receptor Locations[44]

Receptor	Receptor ID	UTM X (m)	UTM Y (m)
PMI	759	284,731.4	4,019,450.1
MEIR	730	284,928.6	4,019,640.9
MEIW	471	285,001.6	4,019,627.6

The HRA includes cancer risks results at the PMI, MEIR, and MEIW as follows:

[39] Op. Cit. 6
[40] Op. Cit.
[41] Op. Cit.7.
[42] Op. Cit. 8.
[43] Op. Cit.
[44] Op. Cit.

Table 16. Construction Cancer Risk Results[45]			
Receptor	**UTM X (m)**	**UTM Y (m)**	**Cancer Risk**
PMI	284,731.4	4,019,450.1	1.0 in one million[1]
MEIR	284,928.6	4,019,640.9	5.0 in one million
MEIW	285,001.6	4,019,627.6	0.6 in one million
1 The cancer risk at the PMI presented above assumes the worker receptor exposure scenario because the PMI is located on the facility fenceline where residential receptors do not exist.			

Table 17. Operational Cancer Risk Results[46]			
Receptor	**UTM X (m)**	**UTM Y (m)**	**Cancer Risk**
PMI	284,731.4	4,019,450.1	3.7 in one million[1]
MEIR	284,928.6	4,019,640.9	8.7 in one million
MEIW	285,001.6	4,019,627.6	0.6 in one million
1 The cancer risk at the PMI presented above assumes the worker receptor exposure scenario because the PMI is located on the facility fenceline where residential receptors do not exist.			

Table 18. Total Cancer Risk Results[47]			
Receptor	**UTM X (m)**	**UTM Y (m)**	**Cancer Risk**
PMI	284,731.4	4,019,450.1	9.4 in one million[1]
MEIR	284,928.6	4,019,640.9	13.7 in one million
MEIW	285,001.6	4,019,627.6	1.3 in one million[1]
1 Total cancer risk at the PMI and MEIW include the WAF of 2.0.			

As noted in the HRA, these result conclude that, "Diesel particulate matter (DPM) is the primary cancer risk driver."[48]

The HRA includes non-cancer chronic HI at the PMI, MEIR, and MEIW as follows:

Table 19. Construction Non-cancer Chronic Health Index[49]				
Receptor	**UTM X (m)**	**UTM Y (m)**	**Non-Cancer Chronic HI**	**Target Organ**
PMI	284,731.4	4,019,450.1	7.6E-02[1]	RESP
MEIR	284,928.6	4,019,640.9	5.6E-03	RESP
MEIW	285,001.6	4,019,627.6	4.3E-03	RESP
1 The cancer risk at the PMI presented above assumes the worker receptor exposure scenario because the PMI is located on the facility fenceline where residential receptors do not exist.				

Table 20. Operation Non-cancer Chronic Health Index[50]				
Receptor	**UTM X (m)**	**UTM Y (m)**	**Non-Cancer Chronic HI**	**Target Organ**
PMI	284,731.4	4,019,450.1	0.2[1]	RESP
MEIR	284,928.6	4,019,640.9	0.06	RESP
MEIW	285,001.6	4,019,627.6	0.02	RESP
1 The cancer risk at the PMI presented above assumes the worker receptor exposure scenario because the PMI is located on the facility fenceline where residential receptors do not exist.				

[45] Op. Cit. 9.
[46] Op. Cit.
[47] Op. Cit.
[48] Op. Cit.
[49] Op. Cit.
[50] Op. Cit. 10

As noted in the HRA, these result conclude that, "Arsenic is the primary non-cancer chronic HI driver. The primary target organ for the non-cancer chronic HI is the respiratory system."[51]

The HRA includes non-cancer acute HI at the PMI, MEIR, and MEIW as follows:

Table 21. Construction Non-cancer Acute Health Index[52]

Receptor	UTM X (m)	UTM Y (m)	Non-Cancer Acute HI	Target Organ
PMI	284,731.4	4,019,450.1	0	IMMUN
MEIR	284,928.6	4,019,640.9	0	IMMUN
MEIW	285,001.6	4,019,627.6	0	IMMUN

Table 22. Operation Non-cancer Acute Health Index[53]

Receptor	UTM X (m)	UTM Y (m)	Non-Cancer Acute HI	Target Organ
PMI	284,731.4	4,019,450.1	0.3	IMMUN
MEIR	284,928.6	4,019,640.9	0.07	IMMUN
MEIW	285,001.6	4,019,627.6	0.07	IMMUN

As noted in the HRA, these result conclude that, "Nickel is the primary non-cancer acute HI driver. The primary target organ system is the immune system."[54]

Therefore, based on the summary analysis above, and in detail in the HRA, the Project does not pose a risk to nearby receptors, by concluding "The total cancer risk is 13.6 in one million which is below the significance threshold of 20 in one million, the total non-cancer chronic HI is below 1, and the total non-cancer acute is below 1 at both the MEIR and MEIW. Therefore, the potential risks from TACs are below SJVAPCD CEQA significance thresholds."[55] As such, ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Hazardous Waste Cleanup Sites: The Project has the potential to temporarily expose nearby receptors to fugitive particulate (dust) emissions during the short-term construction phase and from ongoing operational activities such as unloading raw materials from trucks to stockpiles, transferring material from stockpiles to processing areas, windblown dust from on-site haul roads and the stockpiles themselves. As of November, 2019, there were no listings within the Project vicinity in the California Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Site List.[56] A query performed on the DTSC *Envirostor* indicated that the nearest superfund, state response, voluntary cleanup, school cleanup or corrective actions are more than three (3) miles from the Project site.[57] A query of the State Water Resources Control Board (WRCB) *GeoTracker* Sites and Facilities mapping programs revealed two (2) permitted underground storage tank (UST) sites and one (1) cleanup program site with closed cases, and one

[51] Op. Cit.
[52] Op. Cit.
[53] Op. Cit.
[54] Op. Cit.
[55] Op. Cit. 11
[56] DTSC. Hazardous Waste and Substance Site List. Accessed November 2019 at: https://www.envirostor.dtsc.ca.gov/public/search.asp?page=8&cmd=search&business_name=&main_street_name=&city=&zip=&county=&status=ACT%2CBKLG%2CCOM&branch=&site_type=CSITES%2COPEN%2CFUDS%2CCLOSE&npl=&funding=&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST&reporttype=CORTESE&federal_superfund=&state_response=&voluntary_cleanup=&school_cleanup=&operating=&post_closure=&non_operating=&corrective_action=&tiered_permit=&evaluation=&spec_prog=&national_priority_list=&senate=&congress=&assembly=&critical_pol=&business_type=&case_type=&searchtype=&hwmp_site_type=&cleanup_type=&ocieerp=&hwmp=False&permitted=&pc_permitted=&inspections=&complaints=&censustract=&cesdecile=&school_district=&orderby=county. Accessed November 2019.
[57] DTSC. Envirostor. Sites and Facilities mapping website. Accessed November 2019 at: https://www.envirostor.dtsc.ca.gov/public/map/.

(1) military cleanup site within three (3) miles of the Project site; however, none of these sites are within the immediate vicinity of the site.[58] A query performed on the U.S. Environmental Protection Agency (EPA) *Superfund Enterprise Management System* (SEMS) website found that there are no listed polluted sites within the Project vicinity.[59] Therefore, fugitive dust emissions resulting from earthmoving activities would not expose nearby receptors to substantial pollutant concentrations. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Valley Fever: Although not specifically required by CEQA, the following discussion related to valley fever is included to satisfy requirements for full disclosure of potential Project-related impacts and are for information purposes only. Valley fever, or coccidioidomycosis, is an infection caused by inhalation of the spores of the fungus, *Coccidioides immitis (C. immitis*). According to the Centers for Disease Control (CDC), the San Joaquin Valley is considered an endemic area for valley fever.[60] "People can get Valley fever by breathing in the microscopic fungal spores from the air, although most people who breathe in the spores don't get sick. Usually, people who get sick with Valley fever will get better on their own within weeks to months, but some people will need antifungal medication."[61] Construction-related activities generate fugitive dust that could potentially contain *C. immitis* spores. The Project will be required to implement General Plan Policy AQ-4.2 (Dust Suppression Measures), which was specifically designed to address impacts from the generation of dust emitted into the air. The Project will be required to comply with Air District Regulation VIII (Fugitive PM10 Prohibitions) requirements, including submittal of construction notification and/or dust control plan(s), which minimize the generation of fugitive dust during construction- and operations related activities. Therefore, implementation of General Plan policies and compliance with Air District rules and regulations would reduce the chance of exposure of nearby receptors to valley fever during construction- and operation-related activities. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Naturally Occurring Asbestos: Although not specifically required by CEQA, the following discussion related to naturally occurring asbestos is included to satisfy requirements for full disclosure of potential Project-related impacts and are for information purposes only. In areas containing naturally occurring asbestos, earthmoving construction-related activities, such as grading and trenching, could expose receptors to windblown asbestos. According to a United States Geological Soil Survey map of areas where naturally occurring asbestos in California are likely to occur, the Project is not located in an area known to contain naturally occurring asbestos.[62] The Project site and the immediate vicinity has been previously disturbed by agricultural operations and by rural residential development. The Project will be required to implement General Plan Policy AQ-4.2 (Dust Suppression Measures) to comply with Air District Regulation VIII (Fugitive PM10 Prohibitions) requirements, thereby reducing the chance of exposure to asbestos during construction-related activities. Therefore, ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

[58] WRCB. GeoTracker. Sites and Facilities mapping website. Accessed November 2019 at: https://geotracker.waterboards.ca.gov/. Accessed November 2019.

[59] EPA. SEMS Search. Accessed November 2019 at: https://www.epa.gov/enviro/sems-search.

[60] CDC. Accessed November 2019 at: https://www.cdc.gov/fungal/diseases/coccidioidomycosis/maps.html.

[61] CDC. Accessed November 2019 at: https://www.cdc.gov/fungal/diseases/coccidioidomycosis/index.html.

[62] USGS. *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California*. Accessed May 2019 at: http://pubs.usgs.gov/of/2011/1188/.

Cumulative Impact Analysis: ***Less Than Significant Impact***

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. As previously discussed, the HRA included in Appendix "A" demonstrates that the Project will not result in significant health risks to nearby receptors. The Tulare County General Plan includes policies, which were specifically designed to engage responsible agencies in the CEQA process, to reduce air pollutant emissions through project design, require compliance with emission-reducing regulations, and to address potential impacts from siting incompatible uses in close proximity to each other. Applicable General Plan policies will be implemented for the Project. Compliance with applicable Air District rules and regulations would further reduce potential impacts from exposure to TAC and HAP emissions, as well as valley fever and asbestos. As such, the development of the proposed Project would not expose the public to substantial pollutant concentrations. Therefore, a ***Less Than Significant Cumulative Impact*** related to this Checklist Item will occur.

Mitigation: ***None Required.***

Conclusion: ***Less Than Significant Impact***

As noted earlier, the HRA included in Appendix "A" of the DEIR demonstrates that the proposed Project would not expose the public to substantial pollutant concentrations. Therefore, ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item will occur.

d) Would the project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Project Impact Analysis: ***Less Than Significant Impact***

Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, schools, etc. warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, worksites, and commercial areas. As previously discussed, the GAMAQI indicates that two situations create a potential for odor impacts. The first occurs when a new odor source (identified as a generator in the GAMAQI) is located near an existing sensitive receptor. The second occurs when a new sensitive receptor (identified as a receiver in the GAMAQI) locates near an existing source of odor. However, with the CBIA v. BAAQMD ruling, impacts of existing sources of odors on the Project are not subject to CEQA review; therefore, the impact of potential odors from the nearby dairy facilities and Visalia WCP on the Project is not required. Therefore, the following analysis is provided for information only.

As presented in **Table 8**, the Air District has determined the common land use types that are known to produce odors in the San Joaquin Valley Air Basin including asphalt batch plants. The existing Visalia Water Conservation Plant, a wastewater treatment facility (located approximately one mile north of the Project), and agricultural uses (dairies) in the vicinity (approximately 1,000 feet east and 3,500 feet west of the Project) could be a source of nuisance odors. All projects, with the exception of agricultural operations, are subject to Air District Rule 4102 (Nuisance). Therefore, odors from agriculture-related operations would not be subject to complaint reporting. There is potential for these agricultural operations to generate objectionable odors during certain atmospheric changes; however, these odors would be temporary and/or seasonal in nature.

Furthermore, the Tulare County General Plan includes Policy AG-1.14 Right-to-Farm Noticing which requires new property owners to acknowledge and accept the inconveniences associated with normal farming activities. If future developments are proposed adjacent to active agricultural uses, future residents will be required to sign a "Right to Farm" notice. To ensure potential nuisance odor impacts are addressed, if proposed developments were to result in sensitive receptors being located closer than the recommended distances to any odor generator identified in **Table 8**, a more detailed analysis, is recommended. The detailed analysis would involve contacting the Air District's Compliance Division for information regarding odor complaints Implementation of the applicable General Plan policies and compliance with applicable Air District rules and regulations specifically designed to address air quality and odor impacts, would reduce potential odor impacts. The Project will employee 15-20 workers; as such, the Project would not place, create, or expose a substantial number of people to objectionable odors. Therefore, ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Potential odor sources associated with construction-related activities could originate from diesel exhaust from construction (set-up) of equipment, incoming and out-going diesel-fueled heavy-duty vehicles, and fumes from architectural coating (repainting of existing residential building) and paving operations. However, construction-related odors ad emissions from diesel-fueled heavy-duty vehicles, if perceptible, would dissipate as they mix with the surrounding air and would be of very limited duration. As such, objectionable odors during construction-related activities and emissions from diesel-fueled heavy-duty vehicles would not affect a substantial number of people.

The Project includes a HMA batch plant, RAP plant, and concrete batch plant. Potential odor sources associated with operation-related activities could originate from fumes from the asphalt batch plant, diesel exhaust from off-road haul equipment, and diesel exhaust from incoming and out-going diesel-fueled heavy-duty transport vehicles. As presented in **Table 8**, asphalt batch plants are considered to have potentially significant impacts on receptors located within one (1) mile. The site is located in a generally rural area surrounded by agricultural uses; the nearest residential receptors (a row of houses) are located approximately 800 feet (0.15 mile) east of the Project site and the nearest school is located approximately three (3) miles east of the Project site. There are no other sensitive receptors such as schools, day-care centers, or hospitals nearby. During operation, the various processing plants and diesel-powered vehicles and equipment in use on-site would create localized odors. As it is expected that many of the truck delivery and shipments would take place during peak hours, these odors would be temporary and would not likely be noticeable for extended periods of time beyond the Project's site boundaries. Furthermore, the Project is subject to Air District permit requirements, including Rule 4102 (Nuisance). Because the sources of odors within the Project site will dissipate with distance and should not reach an objectionable level at the nearby residence the Project would not create or expose existing residents to objectionable odors. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Cumulative Impact Analysis: ***Less Than Significant Impact***

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. As noted earlier, the Project contains an asphalt batch plant that has the potential to create objectionable odors. However, the Project will be subject to Air District Rule 4102 (Nuisance) and other applicable Air. District rules, regulations, and permit requirement. Also, Tulare County General Plan Policy AG-1.14 Right-to-Farm Noticing will be implemented. As such, the Project will not

expose a substantial number of people to objectionable odors. Therefore, ***Less Than Significant Cumulate Impacts*** related to this Checklist Item will occur.

Mitigation: ***None Required.***

Conclusion: ***Less Than Significant Impact***

The Project's asphalt batch plant has the potential as a source of nuisance odors. Existing agricultural sources (e.g., dairies) present permanent odors in the Project vicinity that could affect nearby receptors (i.e., rural residences). Implementation of applicable Air District rules, regulations, and permit requirements and General Plan Policy (i.e., AG-1.14 Right-to-Farm) would reduce objectionable odors. As such, the Project will not expose a substantial number of people to objectionable odors. Therefore, ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item will occur.

GREENHOUSE GAS IMPACTS

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Project Impact Analysis: ***Less Than Significant Impact***

In addition to their GAMAQI and Guidance for Agencies documents, the Air District adopted the policy: *District Policy – Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency* to assist permit applicants and project proponents in assessing the impacts of project specific GHG emissions from stationary source projects.[63] This policy applies to projects for which the Air District has discretionary approval authority over the project and serves as the lead agency for CEQA purposes; however, land use agencies can refer to it as guidance for projects that include stationary sources of emissions.[64] The policy summarizes the Air District's evaluation process for determining the significance of GHG-related impacts for stationary source projects as presented in **Figure 4**.[65]

The Air District has determined that, "[p]rojects complying with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions within the geographic area in which the project is located would be determined to have a less than significant individual and cumulative impact for GHG emissions. Such plans or programs must be specified in law or approved by the lead agency with jurisdiction over the affected resource and supported by a CEQA compliant environmental review document adopted by the lead agency. Projects complying with an approved GHG emission reduction plan or GHG mitigation program would not be required to implement BPS."[66]

[63] Air District, Air District Policy. Agency. http://www.valleyair.org/Programs/CCAP/12-17-09/2%20CCAP%20-%20FINAL%20District%20Policy%20CEQA%20GHG%20-%20Dec%2017%202009.pdf. Accessed November 2019.

[64] Air District, Fact Sheet: Addressing Greenhouse Gas Emissions Impact under the California Environmental Quality Act (CEQA) – Stationary Source Projects. Accessed November 2019 at: http://www.valleyair.org/Programs/CCAP/bps/Fact_Sheet_Stationary_Sources.pdf..

[65] Air District, GAMAQI. Figure 6. Page 113 and, Air District Policy. Page10.

[66] Air District. Air District Policy. Page 8.

Section 15064.4(b) of the CEQA Guidelines states that a lead agency should consider the following three considerations when determining the significance of impacts from GHG emissions.

> "(1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
>
> (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
>
> (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, e.g., section 15183.5(b)). Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project. In determining the significance of impacts, the lead agency may consider a project's consistency with the State's long-term climate goals or strategies, provided that substantial evidence supports the agency's analysis of how those goals or strategies address the project's incremental contribution to climate change and its conclusion that the project's incremental contribution is not cumulatively considerable."[67]

The Tulare County Climate Action Plan (CAP) was adopted in 2012 to address AB 32 2020 targets and ARB's 2008 Scoping Plan and was updated in 2018 to address SB 32 2030 targets and ARB's 2017 Scoping Plan. The CAP states, "The 2018 CAP Update includes an additional method of determining project consistency with the CAP and 2030 targets. Projects subject to CEQA review could use a checklist containing design features and measures that are needed to determine consistency. Large projects (500-unit subdivisions and 100,000 square feet of retail or equivalent intensity for other uses) and new specific plans should provide a greenhouse gas analysis report quantifying GHG emissions to demonstrate that the project emissions are at least 31 percent below 2015 levels by 2030 or 9 percent below BAU emissions in 2030. These are the amounts currently required from development related sources to demonstrate consistency with SB 32 2030 targets. Smaller projects may also prepare a GHG analysis report if the checklist is not appropriate for a particular project or is deemed necessary by the project proponent or County staff. The GHG analysis should incorporate as many measures as possible from the CalEEMod mitigation component as described in Table 15 [of the CAP Update] and can take credit for 2017 Scoping Plan measures that have not been incorporated into CalEEMod but that will be adopted prior to 2030 such as 50 percent RPS."[68]

The CAP fulfills the requirements of consideration #3 as a local plan for the reduction or mitigation of greenhouse gas emissions. The CAP includes strategies to reduce GHG emissions through compliance with relevant General Plan policies and statewide GHG regulations. The 2018 CAP indicates that the County is on track to achieve the AB 32 2020 targets with the existing CAP measures and includes new targets for 2030. The CAP target for 2030 is a per capita rate of 4.18

[67] CEQA Guidelines § 15064.4(b).

[68] Tulare County Climate Action Plan. December 2018 Update. Page 73. Accessed November 2019 at: http://generalplan.co.tulare.ca.us/documents/GP/001Adopted%20Tulare%20County%20General%20Plan%20Materials/220Climate%20Action%20Plan/CLIMATE%20ACTION%20PLAN%202018%20UPDATE.pdf.

tons per person in 2030. This would require an 8.6 percent reduction from business as usual in 2030 accounting for regulations currently in place.

The CAP focuses on residential and commercial development. CAP targets are not intended for Industrial process emissions since they are subject to Cap-and-Trade. Industrial projects with large numbers of employees and air-conditioned buildings would be subject to the CAP targets related to building energy efficiency and employee commuting. As the Project will use the existing on-site residential unit as an office it includes no new buildings and will require 15-20 employees. No asphalt or concrete industry-specific local measures are included in the CAP; however, the Project will comply State regulations that apply to fuels used by Project trucks and equipment, vehicle emission standards, and electricity consumed by the Project that will reduce Project emissions. For industrial projects where the Air District is a Responsible Agency, the project would be expected to implement BPS as included in the Air District's policies and guidelines on the processes and stationary equipment that emit greenhouse gases to levels that meet or exceed state targets and may be subject to Cap-and-Trade Program requirements. As the Project requires submittal of Authority to Construct (ATC) permits and Permits to Operate (PTO) the Air District is a Responsible Agency. Therefore, the following analysis provides a quantitative analysis of its GHG emissions for informational purposes only and assesses compliance with plans and regulations adopted to reduce or mitigate GHG emissions.

The State's regulatory program implementing the 2008 Scoping Plan is now fully mature. All regulations envisioned in the Scoping Plan have been adopted by the responsible agencies and the effectiveness of those regulations has been estimated by the agencies during the adoption process and then are tracked to verify their effectiveness after implementation .As previously noted, the State is on track to achieve the 2020 target with adopted regulations and has adopted the 2017 Scoping Plan Update which provides the State's strategy to achieve the SB 32 2030 target of a 40 percent reduction in emissions compared to 1990 levels. The 2017 Scoping Plan includes existing and new measures that when implemented are expected to achieve the SB 32 2030 target. The 2017 Scoping Plan achieves substantial reductions beyond 2020 through continued implementation of existing regulations. Other regulations will be adopted to implement recently enacted legislation including SB 350, which requires an increase in renewable energy from 33 percent to 50 percent and doubling the efficiency of existing buildings by 2030. The Legislature extended the Cap-and-Trade Program through 2030. Cap-and-Trade provides a mechanism to make up shortfalls in other strategies if they occur.[69] In addition, the strategy relies on reductions achieved in implementing the ARB Short-Lived Climate Pollutant (SLCP) Reduction Strategy to reduce pollutants not previously controlled for climate change such as black carbon, methane, and hydrofluorocarbons (HFCs).[70]

The State's regulatory program is able to target both new and existing development because the two most important strategies—motor vehicle fuel efficiency and emissions from electricity generation— obtain reductions equally from existing and new sources. This is because all vehicle operators use cleaner low carbon fuels and buy vehicles subject to the fuel efficiency regulations, and all building owners or operators purchase cleaner energy from the grid that is produced by increasing percentages of renewable fuels. This includes regulations on mobile sources such as the

[69] ARB. California's 2017 Climate Change Scoping Plan. Accessed November 2019at: https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

[70] ARB. Short-Lived Climate Pollutant Reduction Strategy. Accessed November 2019 at https://ww2.arb.ca.gov/resources/documents/final-short-lived-climate-pollutant-reduction-strategy-march-2017.

Pavley standards that apply to all vehicles purchased in California, the Low Carbon Fuel Standard (LCFS) that applies to all fuel used in California, and the Renewable Portfolio Standard (RPS) and Renewable Energy Standard that apply to utilities providing electricity to all California homes and businesses. These regulations apply to the Project's most important emission sources (on-road and off-road motor vehicles and energy use) and contribute toward meeting State GHG reduction targets. Measures targeted exclusively at new development include Title 24 Building Efficiency Standards, the CalGreen Building Code, and water conservation measures applicable to new construction.

The State's regulatory strategy relies on Cap-and-Trade Program to achieve most reductions from the industrial sector and it applies to 80 percent of the State's emission inventory. Cap-and-Trade applies to large sources such as electrical utilities, fuel producers and refiners, and cement manufacturers. The Cap-and-Trade Program also addresses emissions from fuels and from combustion of other fossil fuels not directly covered at large sources in the Program. The additional costs for fuel and electricity to comply with Cap-and-Trade are spread throughout the economy to users of the fuel and electricity such as the project.

The analysis for this Project assesses consistency with AB 32's goal in whole or part by looking to compliance with regulatory programs designed to reduce GHG emissions from particular activities. The analysis shows the extent to which the Project complies with adopted regulations. At this point in time, no additional reductions are required from new development beyond regulations for the State to achieve its 2020 target. The 2030 target will require a reduction from 431 metric tons of CO_2 equivalents ($MTCO_2e$) to 260 $MTCO_2e$ or 40 percent from 1990 levels. After accounting for projected growth of approximately 0.8 percent per year an average decrease of 5.2 percent per year from the State GHG inventory will be required to achieve the target. The 2017 Scoping Plan Update includes a strategy for achieving the needed reductions, but does not identify an amount required specifically from new development. However, all GHG emission sources within development projects are subject to GHG regulations at some level.

The quantitative analysis prepared for the Project (summarized in **Table 23**) assesses the extent to which the Project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting under Consideration # 1. As the Project is a new facility, there are no baseline activities in which to compare the Project to; as such, Project emissions are evaluated at the proposed Air District permit limits and represent the total increase in emissions. The analysis assumes a worst-case emissions scenario in which the Project would reach the permit limit in its first year of operation and reflects compliance with existing regulations that apply to the Project.

The Tulare County CAP includes a threshold approach that complies with Consideration #2 for commercial and residential development based on a percent reduction from BAU in 2030, but it is not applicable to asphalt and concrete production industries. The CAP found that additional reductions from industrial sources beyond regulations would not be required to reach the 2030 target since those emissions were subject to regulation by other entities such as Cap-and-Trade, which applies to 80 percent of the State's GHG emission inventory. .

Operational or long-term emissions occur over the life of the Project. Sources of emissions include the HMA, RAP, and concrete batch plants, motor vehicles and trucks, energy usage, waste generation, and area sources. Operational emissions were modeled for the permitted throughput limit, which reflects a worst-case emissions scenario. The emissions were modeled in 2020 using

CalEEMod and spreadsheet calculations using the EMFAC mobile source emission model and EPA emission factors. CalEEMod assumes compliance with some, but not all, applicable rules and regulations regarding energy efficiency, vehicle fuel efficiency, renewable energy usage, and other GHG reduction policies, as described in the CalEEMod User's Guide.

Full assumptions and model outputs are provided in the Health Risk Assessment report, Authority to Construct Applications, and Greenhouse Gas Analysis memo prepared by Alta Environmental (Appendix A of the DEIR), and the CalEEMod report included as Attachment A of this memo. The results of the GHG analysis for the Project operational emissions are presented in **Table 23**.

Table 23. Project Greenhouse Gas Emissions

Source	**Emissions ($MTCO_2e$ per year)**
Construction	
On-site Emissions [1]	325
Off-site Emissions [1]	585
Total Construction	***909***
On-Site Operations	
HMA Dryer [2]	36,391
HMA Oil Heater [2]	539
On-site Haul Trucks [2]	257
On-site Off-Road Equipment [2]	698
Area Sources [1]	0.01
Energy [1]	45
Waste [1]	31
Water [1]	16
Total On-Site Operations	*37,977*
Off-Site Operations	
Off-site Haul Trucks and Delivery Vehicles[3]	4,485
Employee Vehicles [3]	118
Total Off-Site Operations	*4,604*
Total Operations	**43,490**

Notes: $MTCO_2e$ = metric tons of carbon dioxide equivalents.
1 Source:Health Risk Assessment (Attachment 2) prepared by Alta Environmental. Operational mobile sources not included as they were included in the calculations in Attachment A of this analysis.
2 Source:Greenhouse Gas Analysis memo prepared by Alta Environmental.
3 Source:Attachment A of this memo.

As shown in **Table 23**, the Project would result in GHG emissions of 43,490 $MTCO_2e$ per year. The modeling includes the benefits of existing regulations that reduce Project emissions. The analysis presented above does not include new strategies proposed in the 2030 Scoping Plan Update. The Update provides alternatives in terms of their likelihood of implementation and ranges of reduction from the strategies. Measures already authorized by legislation are highly likely to be implemented, while measures requiring new legislation are less likely to go forward. A new round of motor vehicle fuel efficiency standards beyond 2025 when LEV III standards are at their maximum reduction level is highly likely. Changing heavy-duty trucks and off-road equipment to alternative fuels face greater technological hurdles and are less likely to provide dramatic reductions by 2030.

The 2030 emission limit is 260 MMTCO2e. The ARB estimates that the 2030 BAU (reference) Inventory will be 392 MMTCO2e—a reduction of 132 MMCO2e, including existing policies and programs but not including known commitments that are already underway. The 2030 Scoping Plan Update includes the estimated GHG emissions by sector compared with 1990 levels that is presented in **Table 24**. The proposed plan would achieve the bulk of the reductions from Electric Power, Industrial fuel combustion, and Transportation. Cap-and-Trade would provide between 10 to 20 percent of the required reductions depending on the amounts achieved by the other reduction measures.

Table 24. 2030 Scoping Plan Update Estimated Change in GHG Emissions by Sector

Scoping Plan Sector	Emissions ($MMTCO_2e$ per year)		
	1990	**2030 Proposed Plan Ranges**	**Percent Change from 1990**
Agriculture	26	24-25	-4 to -8
Residential and Commercial	44	38-40	-9 to -14
Electric Power	108	42-62	-43 to -61
High GWP	3	8-11	167 to 267
Industrial	98	77-87	-11 to -21
Recycling and Waste	7	8-9	14 to 29
Transportation (including TCU)	152	103-111	-27 to -32
Net Sink	-7	TBD	TBD
Subtotal	**431**	**300-345**	**-20 to -30**
Cap-and-Trade Program	N/A	40-85	N/A
Total	**431**	**260**	**-40**

Notes:
GWP = Global Warming Potential; TCU = Transportation Communications and Utilities
Source: ARB 2030 Scoping Plan Update

Although the 2030 Scoping Plan Update focuses on state agency actions necessary to achieve the 2030 GHG limit, the ARB considers local governments essential partners in achieving the State's goals to reduce GHG emissions. The 2030 target will require an increase in the rate of emission reductions compared to what was needed to achieve the 2020 limit, and this will require action and collaboration at all levels, including local government action to complement and support State-level actions. For individual projects, the 2030 Scoping Plan Update suggests that all new land use development implement all feasible measures to reduce GHG emissions. The Scoping Plan does not define all feasible measures or attribute an amount of reductions required from new development beyond compliance with regulations; however, the CAP provides measures and reduction amounts that are feasible for commercial and residential development. No reduction amount or threshold was developed for industrial projects. Requiring the project operator to fully mitigate emissions without accounting for compliance with regulations would result in double mitigation, first by the regulated entity and then by the project operator purchasing electricity, fuel, and vehicles compliant with regulations in effect at the time of purchase and beyond that would violate constitutional nexus requirements.

Based on progress achieved to date and the strong likelihood that the measures included in the 2017 Scoping Plan Update will be implemented, it is reasonable to conclude that the Project is consistent with the 2017 Scoping Plan and will contribute a reasonable fair-share contribution to achieving the 2030 target. The fair share may very well be achieved through compliance with increasingly stringent State regulations that apply to energy production, fuels, and motor vehicles. As shown in **Table 24**, the state strategy relies on the Cap-and-Trade Program to make up any

shortfalls that may occur from the other regulatory strategies. The costs of Cap-and-Trade emission reductions will ultimately be passed on to the consumers of fuels, electricity and products produced by regulated industries, which includes the project and other purchasers of products and services. Therefore, the impact in terms of Considerations #1 and #2 would be less than significant.

As discussed above, the Project will result in GHG emissions from the construction of the Project and from the operations of the proposed production facilities (HMA, RAP and concrete plants), office (heating and cooling, cleaning supplies, etc.) as well as from on-site off-road equipment and off-site on-road vehicles (haul trucks for transport of raw material and finished product, outside services and deliveries, and employees trips). The Project will continue to comply with existing and future regulations, including the Cap-and-Trade program, State truck regulations, and Air District permit requirements, and the General Plan, Community Plan, and CAP will continue to be implemented through 2030. Therefore, ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Cumulative Impact Analysis: ***Less Than Significant Impact***

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. The Project-related emissions would be considered to have a significant cumulative impact if project-specific impacts are determined to be significant. As previously noted, the Project is required to comply with applicable State GHG reduction program (including Cap-and-Trade and truck regulations) and is therefore, consistent with the reduction targets for years 2020 and 2030. As the proposed Project would result in Less Than Significant Project-specific Impacts, ***Less Than Significant Cumulative Impacts*** would also occur.

Mitigation: ***None Required.***

Conclusion: ***Less Than Significant Impact***

As previously noted, the Project is consistent with the State's reduction targets established for 2020 and 2030. As such, the Project would not generate GHG emissions that would have a significant impact on the environment. ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item will occur.

b) Would the project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact Analysis: ***Less Than Significant Impact***

To be considered a less than significant impact, the Project must demonstrate consistency with the Tulare County CAP, the Air District's Climate Change Action Plan, and the ARB's 2008 Scoping Plan and 2017 Scoping Plan Update.

Tulare County CAP: The 2008 CAP identifies General Plan policies in place to assist the County in reducing GHG emissions. **Table 25** identifies these policies by policy titles. For a discussion of

the benefits of the policies, refer to the CAP.[71] The Project will implement the applicable General Plan policies.

Table 25. General Plan Policies Having Greenhouse Gas Emission Reductions

Sustainability and Greenhouse Gas Emissions			
PF-1.1	Maintain Urban Edges	ERM-1.2	Development in Environmentally Sensitive Areas
PF-1.2	Location of Urban Development	ERM-1.3	Encourage Cluster Development
PF-1.3	Land Uses in UDBs/HDBs	ERM-1.4	Protect Riparian Management Plans and Mining Reclamation Plans
PF-1.4	Available Infrastructure	ERM-1.6	Management of Wetlands
AG-1.7	Conservation Easements	ERM-1.7	Planting of Native Vegetation
AG-1.8	Agriculture Within Urban Boundaries	ERM-1.8	Open Space Buffers
AG-1.11	Agricultural Buffers	ERM-1.14	Mitigation and Conservation Banking Program
AG-1.14	Right to Farm Noticing	ERM-4.1	Energy Conservation and Efficiency Measures
AG-2.11	Energy Production	ERM-4.2	Streetscape and Parking Area Improvements for Energy Conservation
AG-2.6	Biotechnology and Biofuels	ERM-4.3	Local and State Programs
AQ-1.6	Purchase of Low Emission/Alternative Fuel Vehicles	ERM-4.4	Promote Energy Conservation Awareness
AQ-1.7	Support Statewide Global Warming Solutions	ERM-4.6	Renewable Energy
AQ-1.8	Greenhouse Gas Emissions Reduction Plan	ERM-4.7	Reduce Energy Use in County Facilities**
AQ-1.9	Off-Site Measures to Reduce Greenhouse Gas Emissions*	ERM-4.8	Energy Efficiency Standards**
AQ-1.10	Alternative Fuel Vehicle Infrastructure**	ERM-5.1	Parks as Community Focal Points
AQ-2.1	Transportation Demand Management Programs	ERM-5.6	Location and Size Criteria for Parks
AQ-2.3	Transportation and Air Quality	ERM-5.15	Open Space Preservation
AQ-2.4	Transportation Management Associations	HS-1.4	Building and Codes
AQ-2.5	Ridesharing	TC-2.1	Rail Service
AQ-3.1	Location of Support Services	TC-2.4	High Speed Rail (HSR)
AQ-3.2	Infill Near Employment	TC-2.7	Rail Facilities and Existing Development*
AQ-3.3	Street Design	TC-4.4	Nodal Land Use Patterns that Support Public Transit
AQ-3.5	Alternative Energy Design	TC-5.1	Bicycle/Pedestrian Trail System
AQ-3.6	Mixed Use Development	TC-5.2	Consider Non-Motorized Modes in Planning and Development
LU-1.1	Smart Growth and Healthy Communities	TC-5.3	Provisions for Bicycle Use
LU-1.2	Innovative Development	TC-5.4	Design Standards for Bicycle Routes
LU-1.3	Prevent Incompatible Uses	TC-5.5	Facilities
LU-1.4	Compact Development	TC-5.6	Regional Bicycle Plan
LU-1.8	Encourage Infill Development	TC-5.7	Designated Bike Paths
LU-2.1	Agricultural Lands	TC-5.8	Multi-Use Trails
LU-3.2	Cluster Development	PFS-1.3	Impact Mitigation
LU-3.3	High-Density Residential Locations	PFS-1.15	Efficient Expansion
LU-4.1	Neighborhood Commercial Uses	PFS-2.1	Water Supply
LU-7.1	Distinctive Neighborhoods	PFS-2.2	Adequate Systems
LU-7.2	Integrate Natural Features	PFS-3.3	New Development Requirements
LU-7.3	Friendly Streets	PFS-5.3	Solid Waste Reduction
LU-7.15	Energy Conservation	PFS-5.4	County Usage of Recycled Materials and Products
ED-2.3	New Industries	PFS-5.5	Private Use of Recycled Products
ED-2.8	Jobs/Housing Ratio	PFS-8.3	Location of School Sites
ED-5.9	Bikeways	PFS-8.5	Government Facilities and Services
ED-6.1	Revitalization of Community Centers	WR-1.5	Expand Use of Reclaimed Wastewater
ED-6.2	Comprehensive Redevelopment Plan	WR-1.6	Expand Use of Reclaimed Water
ED-6.3	Entertainment Venues		
ED-6.4	Culturally Diverse Business		
ED-6.5	Intermodal Hubs for Community and Hamlet Core Areas		
ED-6.7	Existing Commercial Centers		
SL-3.1	Community Centers and Neighborhoods		

[71] Tulare County. Climate Action Plan (2010). Accessed November 2019 at: http://generalplan.co.tulare.ca.us/documents/GeneralPlan2010/ClimateActionPlan.pdf; and Climate Action Plan Update (2018) at: http://generalplan.co.tulare.ca.us/documents/GP/001Adopted%20Tulare%20County%20General%20Plan%20Materials/220Climate%20Action%20Plan/CLIMATE%20ACTION%20PLAN%202018%20UPDATE.pdf.

Table 25. General Plan Policies Having Greenhouse Gas Emission Reductions			
Sustainability and Greenhouse Gas Emissions			
ERM-1.1	Protection of Rare and Endangered Species	WR-3.5	Use of Native and Drought Tolerant Landscaping
Source: Tulare County Climate Action Plan (2012), Table 20. * This GHG reduction policy is not included in the Tulare County CAP, but is included in the Tulare County General Plan 2030 Update. ** This GHG reduction policy is not included in Table 20 of the CAP, but it is included in the detailed list of policies provided within pages 64-77 of the CAP.			

As previously discussed, the 2018 CAP Update address SB 32 2030 targets and ARB's 2017 Scoping Plan and focuses on residential and commercial development and CAP reduction targets are not intended for Industrial process emissions since they are subject to Cap-and-Trade. No asphalt or concrete industry-specific local measures are included in the CAP; however, the Project will comply State regulations that apply to fuels used by Project trucks and equipment, vehicle emission standards, and electricity consumed by the Project that will reduce Project emissions. As the Air District is a Responsible Agency for this Project, the Project would be expected to implement applicable BPS as included in the Air District's policies and guidelines on the processes and stationary equipment that emit greenhouse gases to levels that meet or exceed state targets and may be subject to Cap-and-Trade Program requirements. Therefore, ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Air District Climate Change Action Plan: The Air District adopted the Climate Change Action Plan (CCAP) in 2008, which included a carbon-exchange bank for voluntary GHG reductions.[72] The Carbon Exchange Program is not applicable to this Project, and the Project would not require Voluntary Greenhouse Gas Mitigation Agreements. The Project would comply with all applicable GHG regulations contained in the CCAP. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

State Scoping Plans: The 2018 CAP Update includes an additional method of determining project consistency with the CAP and 2030 targets. Projects subject to CEQA review could use a checklist containing design features and measures that are needed to determine consistency with the CAP. As shown in **Table 26**, the Project is consistent with most of the strategies, while others are not applicable to the Project. As discussed earlier, the 2017 Scoping Plan Update strategies primarily rely on increasing the stringency of existing regulations for which the project would continue to comply with and support through the project's design and implementation of the General Plan goals and policies.

Table 26. Consistency with the 2017 Scoping Plan Update	
Scoping Plan Measure	**Project Consistency**
SB 350 50% Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33% in 2020 to 50% in 2030.	**Consistent.** The Project will purchase electricity from a utility subject to the SB 350 Renewable Mandate.
SB 350 Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014	**Not Applicable.** This measure applies to existing buildings. The Project will utilize the existing

[72] SJVAPCD Climate Change Action Plan. Accessed November 2019 at: http://www.valleyair.org/Programs/CCAP/CCAP_menu.htm.

Table 26. Consistency with the 2017 Scoping Plan Update	
Scoping Plan Measure	**Project Consistency**
building energy usage compared to current projected 2030 levels	residential unit as an office and does not include new structures.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	**Consistent.** Vehicles accessing the Project site will use fuel containing lower carbon content as the fuel standard is implemented.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million ZEVs on the road by 2030 and increasing numbers of ZEV trucks and buses.	**Consistent.** The Project will purchase new work trucks when replacement is required and employees can be expected to purchase increasing numbers of more fuel-efficient and zero emission cars and trucks each year.
Sustainable Freight Action Plan. The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	**Not Applicable.** The measure applies to owners and operators of trucks and freight operations. The Project does operate a haul truck fleet to transport both raw materials and final product. The haul trucks that access the site must be capable of handling heavy loads that are currently not feasible with zero emission technology. However, during the life of the Project, ZEV haul trucks may be possible.
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	**Not Applicable.** The Project does not include sources that produce significant quantities of methane or black carbon. Diesel haul trucks accessing the site will achieve significant reductions in $PM_{2.5}$ with adopted regulations that will reduce this source of black carbon.
SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a sustainable communities strategy for reduction of per capita vehicle miles traveled.	**Not Applicable.** The Project is not within an SCS priority area and so is not subject to requirements applicable to those areas. Only 15-20 employees will be required for this Project.
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	**Consistent.** The post-2020 Cap-and-Trade Program indirectly affects people who use the products and services produced by the regulated industrial sources when increased costs of products or services (such as electricity and fuel) are transferred to the consumers. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA Projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the program's first compliance period.
Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, state, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	**Not Applicable.** The Project is an asphalt and concrete production facility that is not suitable site for sequestration.
Source: ARB, 2017 Scoping Plan Update	

As discussed above, since the Project will comply with existing and future regulations, and the General Plan and CAP will continue to be implemented through 2030, the Project would not result in significant greenhouse gas impacts. Therefore, ***Less Than Significant Cumulative Impacts*** related to this Checklist Item will occur.

Cumulative Impact Analysis: ***Less Than Significant Impact***

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. As previously discussed, the Project is consistent with the applicable Scoping Plan reductions measures and the Air District's CCAP. The Project will implement applicable Tulare County General Plan and Tulare County CAP policies. As such, the Project will not conflict with applicable state, regional, and local plans, policies or regulation adopted for the purpose of reducing the emissions of greenhouse gases. ***Less Than Significant Cumulative Impacts*** related to this Checklist Item will occur.

Mitigation Measures: ***None Required***

Conclusion: ***Less Than Significant Impact***

As the proposed Project is consistent with aforementioned plans, policies, and regulations, ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item would occur.