



## Kassab Travel Center Project

### Appendix A

#### Air Quality and Greenhouse Gas Emissions Impact Analysis

**AIR QUALITY AND GREENHOUSE GAS  
EMISSIONS IMPACT ANALYSIS  
KASSAB TRAVEL CENTER PROJECT  
CITY OF LAKE ELSINORE**

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## ACRONYMS AND ABBREVIATIONS

Air Basin	South Coast Air Basin
AQMP	Air Quality Management Plan
CAAQS	California Ambient Air Quality Standards
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAA	California Clean Air Act
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
CO <sub>2e</sub>	Carbon dioxide equivalent
DPM	Diesel particulate matter
EPA	Environmental Protection Agency
°F	Fahrenheit
GHG	Greenhouse gas
GWP	Global warming potential
HFCs	Hydrofluorocarbons
IPCC	International Panel on Climate Change
LST	Localized Significant Thresholds
MSAT	Mobile Source Air Toxics
MTCO <sub>2e</sub>	Metric tons of carbon dioxide equivalent
MMTCO <sub>2e</sub>	Million metric tons of carbon dioxide equivalent
MPO	Metropolitan Planning Organization
NAAQS	National Ambient Air Quality Standards
NO <sub>x</sub>	Nitrogen oxides
NO <sub>2</sub>	Nitrogen dioxide
O <sub>3</sub>	Ozone
PM	Particle matter
PM <sub>10</sub>	Particles that are less than 10 micrometers in diameter
PM <sub>2.5</sub>	Particles that are less than 2.5 micrometers in diameter
PPM	Parts per million
PPB	Parts per billion

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PPT	Parts per trillion
RTIP	Regional Transportation Improvement Plan
SCAQMD	South Coast Air Quality Management District
SIP	State Implementation Plan
SO <sub>x</sub>	Sulfur oxides
TAC	Toxic air contaminants
UNFCCC	United Nations' Framework Convention on Climate Change
VOC	Volatile organic compounds

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## 1.0 INTRODUCTION

### ***1.1 Purpose of Analysis and Study Objectives***

This Air Quality and Greenhouse Gas Emissions Impact Analysis has been completed to determine the air quality and greenhouse gas (GHG) emissions impacts associated with the proposed Kassab Travel Center project (proposed project). The following is provided in this report:

- A description of the proposed project;
- A description of the atmospheric setting;
- A description of the criteria pollutants and GHGs;
- A description of the air quality regulatory framework;
- A description of the air quality and GHG emissions thresholds including the California Environmental Quality Act (CEQA) significance thresholds;
- An analysis of the short-term construction related and long-term operational air quality and GHG emissions impacts;
- An analysis of the conformity of the proposed project with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP); and
- An analysis of the conformity of the proposed project with all applicable GHG emissions reduction plans and policies.

### ***1.2 Site Location and Study Area***

The project site is located in the northern portion of the City of Lake Elsinore (City) on the west corner of Riverside Drive and Collier Avenue at 29301 Riverside Drive. The approximately 2.84-acre project site is located on a vacant parcel that is bounded by commercial uses to the northwest, Collier Avenue and commercial uses to the northeast, Riverside Drive and vacant land to the southeast, and vacant land to the southwest. The project local study area is shown in Figure 1.

### ***Sensitive Receptors in Project Vicinity***

The nearest offsite sensitive receptors to the project site consist of workers at the commercial uses located as near as 100 feet northwest of the project site. There are also single-family homes located as near as 1,700 feet west of the project site. The nearest school to the project site is Temescal Canyon High School that is located as near as 0.5 mile north of the project site.

### ***1.3 Proposed Project Description***

The proposed project would consist of the development of an 18-vehicle fueling position gasoline and diesel station with two canopies that total 6,092 square feet and a maximum throughput of 5.8 million gallons of gasoline per year, an 8,360 square foot convenience store, and a 2,543 square foot fast food restaurant with a drive thru window. The proposed project would also include multiple parking areas with a total of 78-spaces. The proposed site plan is shown in Figure 2.

### ***1.4 Standard Air Quality and GHG Regulatory Conditions***

The proposed project will be required to comply with the following regulatory conditions from the SCAQMD and State of California (State).



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## South Coast Air Quality Management District Rules

The following lists the SCAQMD rules that are applicable to all non-residential projects in the South Coast Air Basin (Air Basin).

### Rule 201 – Permit to Construct

Rule 201 requires that a permit to construct be obtained prior to start of construction activities for all facilities that need to obtain an Air Quality Permit from the SCAQMD to operate, which includes gas stations and restaurants with charbroilers.

### Rule 203 – Permit to Operate

Rule 201 requires that a permit to operate be obtained prior to start of operational activities for all facilities that need to obtain an Air Quality Permit from the SCAQMD to operate, which includes gas stations and restaurants with charbroilers.

### Rule 402 - Nuisance

Rule 402 prohibits a person from discharging from any source whatsoever such quantities of air contaminants or other material which causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. Compliance with Rule 402 will reduce local air quality and odor impacts to nearby sensitive receptors.

### Rule 403- Fugitive Dust

Rule 403 governs emissions of fugitive dust during construction activities and requires that no person shall cause or allow the emissions of fugitive dust such that dust remains visible in the atmosphere beyond the property line or the dust emission exceeds 20 percent opacity, if the dust is from the operation of a motorized vehicle. Compliance with this rule is achieved through application of standard Best Available Control Measures, which include but are not limited to the measures below. Compliance with these rules would reduce local air quality impacts to nearby sensitive receptors.

- Utilize either a pad of washed gravel 50 feet long, 100 feet of paved surface, a wheel shaker, or a wheel washing device to remove material from vehicle tires and undercarriages before leaving project site.
- Do not allow any track out of material to extend more than 25 feet onto a public roadway and remove all track out at the end of each workday.
- Water all exposed areas on active sites at least three times per day and pre-water all areas prior to clearing and soil moving activities.
- Apply nontoxic chemical stabilizers according to manufacturer specifications to all construction areas that will remain inactive for 10 days or longer.
- Pre-water all material to be exported prior to loading, and either cover all loads or maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code Section 23114.
- Replant all disturbed area as soon as practical.
- Suspend all grading activities when wind speeds (including wind gusts) exceed 25 miles per hour.
- Restrict traffic speeds on all unpaved roads to 15 miles per hour or less.

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### Rules 461 – Gasoline Dispensing Facilities

Rule 461 governs the operation of gasoline stations and requires that all underground storage tanks are equipped with a “CARB certified” enhanced vapor recovery system, all fill tubes are equipped with vapor tight caps, all dry breaks are equipped with vapor tight seals, a spill box shall be installed to capture any gasoline spillage, and all equipment is required to be properly maintained per CARB regulations. All gasoline dispensing units are required to be equipped with a “CARB certified” vapor recovery system, the dispensing system components all maintain vapor and liquid tight connections at all times and the breakaway coupling shall be equipped with a poppet valve that shall close when coupling is separated. Rule 461 also provides several additional requirements including detailed maintenance, testing, reporting, and recordkeeping requirements for all gas stations.

### Rules 1108 and 1108.1 – Cutback and Emulsified Asphalt

Rules 1108 and 1108.1 govern the sale, use, and manufacturing of asphalt and limits the VOC content in asphalt. This rule regulates the VOC contents of asphalt used during construction as well as any on-going maintenance during operations. Therefore, all asphalt used during construction and operation of the proposed project must comply with SCAQMD Rules 1108 and 1108.1.

### Rule 1113 – Architectural Coatings

Rule 1113 governs the sale, use, and manufacturing of architectural coatings and limits the VOC content in sealers, coatings, paints and solvents. This rule regulates the VOC contents of paints available during construction. Therefore, all paints and solvents used during construction and operation of the proposed project must comply with SCAQMD Rule 1113.

### Rule 1143 – Paint Thinners

Rule 1143 governs the sale, use, and manufacturing of paint thinners and multi-purpose solvents that are used in thinning of coating materials, cleaning of coating application equipment, and other solvent cleaning operations. This rule regulates the VOC content of solvents used during construction. Solvents used during construction and operation of the proposed project must comply with SCAQMD Rule 1143.

### Rule 1401 – New Source Review of Toxic Air Contaminants

Rule 1401 specifies cancer risk limits and noncancer acute and chronic limits that may be created from new permitted sources of toxic air contaminant emissions, which includes gasoline dispensing facilities. This rule requires the quantification of the cancer risk created by the proposed gasoline dispensing facility, which is provided in Section 7.5 of this Report.

## **State of California Rules**

The following lists the State of California rules that are applicable to all nonresidential projects in the State.

### CARB Regulation for In-Use Off-Road Diesel Vehicles

On July 26, 2007, the California Air Resources Board (CARB) adopted California Code of Regulations Title 13, Article 4.8, Chapter 9, Section 2449 to reduce diesel particulate matter (DPM) and NOx emissions from in-use off-road heavy-duty diesel vehicles in California. Such vehicles are used in construction, mining, and industrial operations. The regulation limits idling to no more than five consecutive minutes, requires reporting and labeling, and requires disclosure of the regulation upon vehicle sale. Performance requirements of the rule are based on a fleet’s average NOx emissions, which

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can be met by replacing older vehicles with newer, cleaner vehicles or by applying exhaust retrofits. The regulation was amended in 2010 to delay the original timeline of the performance requirement making the first compliance deadline January 1, 2014 for large fleets (over 5,000 horsepower), 2017 for medium fleets (2,501-5,000 horsepower), and 2019 for small fleets (2,500 horsepower or less). Currently, no commercial operation in California may add any equipment to their fleet that has a Tier 0 or Tier 1 engine. By January 1, 2018 medium and large fleets will be restricted from adding Tier 2 engines to their fleets and by January 2023, no commercial operation will be allowed to add Tier 2 engines to their fleets. It should be noted that commercial fleets may continue to use their existing Tier 0 and 1 equipment, if they can demonstrate that the average emissions from their entire fleet emissions meet the NOx emissions targets.

#### CARB Resolution 08-43 for On-Road Diesel Truck Fleets

On December 12, 2008 the CARB adopted Resolution 08-43, which limits NOx, PM10 and PM2.5 emissions from on-road diesel truck fleets that operate in California. On October 12, 2009 Executive Order R-09-010 was adopted that codified Resolution 08-43 into Section 2025, title 13 of the California Code of Regulations. This regulation requires that by the year 2023 all commercial diesel trucks that operate in California shall meet model year 2010 (Tier 4 Final) or latter emission standards. In the interim period, this regulation provides annual interim targets for fleet owners to meet. By January 1, 2014, 50 percent of a truck fleet is required to have installed Best Available Control Technology (BACT) for NOx emissions and 100 percent of a truck fleet installed BACT for PM10 emissions. This regulation also provides a few exemptions including a onetime per year 3-day pass for trucks registered outside of California. All on-road diesel trucks utilized during construction of the proposed project will be required to comply with Resolution 08-43.

#### California Code of Regulations (CCR) Title 24, Part 6

CCR Title 24, Part 6: *California's Energy Efficiency Standards for Residential and Nonresidential Buildings* (Title 24) standards require the installation of insulated hot water pipes, improved window performance, improved wall insulation, and mandatory duct sealing. Other Title 24 requirements include the use of cool roofing shingles, a minimum 1-inch air space between roof material and roof deck, and a minimum of R-22 roof/ceiling insulation. All lighting is required to be high efficiency and daylight sensors and motion sensors are required for outdoor lighting, bathrooms, utility rooms, and other spaces. The forced air systems are required to limit leakage to 5 percent or less and requires all heat pump systems to be equipped with liquid line filter driers. The 2016 Title 24 Part 6 standards are anticipated to reduce electricity consumption by 281 gigawatt-hours per year and natural gas consumption by 16 million therms per year (<http://www.energy.ca.gov/2015publications/CEC-400-2015-037/CEC-400-2015-037-CMF.pdf>).

#### California Code of Regulations (CCR) Title 24, Part 11

CCR Title 24, Part 11: *California Green Building Standards* (Title 24) requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials. One focus of CCR Title 24, Part 11 is water conservation measures, which reduce GHG emissions by reducing electrical consumption associated with pumping and treating water. CCR Title 24, Part 11 has approximately 52 nonresidential mandatory measures and an additional 130 provisions for optional use. Some key mandatory measures for non-residential buildings include a 20 percent reduction of potable water use within buildings through use of low-flow fixtures, a 50 percent construction waste diversion from landfills, and use of building finish materials and carpets that emit low levels of volatile organic compounds.

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## ***1.5 Summary of Analysis Results***

The following is a summary of the proposed project's impacts with regard to the State CEQA Guidelines air quality and GHG emissions checklist questions.

**Conflict with or obstruct implementation of the applicable air quality plan?**

Less than significant impact.

**Violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

Less than significant impact.

**Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard?**

Less than significant impact.

**Expose sensitive receptors to substantial pollutant concentrations?**

Less than significant impact.

**Create objectionable odors affecting a substantial number of people?**

Less than significant impact.

**Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less than significant impact.

**Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs?**

Less than significant impact.

## ***1.6 Project Design Features Incorporated into the Proposed Project***

This analysis was based on implementation of the following project design features that are either already depicted on the proposed project site plan and architectural plans or are required from State Regulations.

**Project Design Feature 1**

The project applicant shall implement Measure T-1.2 from the Climate Action Plan, which requires the installation of sidewalks along the project site boundary that is adjacent to Riverside Drive and Collier Avenue as well as internal sidewalks to connect to neighborhood activity centers, major destinations, and transit facilities.

**Project Design Feature 2**

The project applicant shall implement Measure T-1.4 from the Climate Action Plan, which requires the installation of a Class II bike lane along the project site boundary with Riverside Drive and Collier Avenue as specified in the Bikeway Plan depicted in the City of Lake Elsinore General.

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### **Project Design Feature 3**

The project applicant shall implement Measure T-1.5 from the Climate Action Plan, which requires the installation of bicycle parking spaces to equal five percent of the visitor parking capacity. This shall be achieved by providing a two-bike capacity rack east of the entrance to the Convenience Store and a two-bike capacity rack south of the entrance the Drive-Thru Restaurant, as detailed on the Site Plan (See Figure 2).

### **Project Design Feature 4**

The project applicant shall implement Measure T-4.1 from the Climate Action Plan, which requires the institution of a trip reduction program for employers with fewer than 100 employees. The trip reduction program shall consist of a board in the employee work area of the Convenience Store and Drive-Thru Restaurant that provides bus route maps and information about carpooling and bicycling to work.

### **Project Design Feature 5**

The project applicant shall prepare a Landscape Plan that meets the requirements of Measures E-1.1 and E-4.1 from the Climate Action Plan, which requires that all new developments plant a minimum one 15 gallon nondeciduous umbrella form tree per 30 linear feet of boundary length (minimum of 47 trees for the project site) and that the Landscape Plan is designed to be consistent with the requirements detailed in Assembly Bill 1881.

### **Project Design Feature 6**

The project applicant shall implement Measure E-1.2 from the Climate Action Plan, which requires the use of roofing material that has an initial Solar Reflectance Index (SRI) of 75 (or 0.75 if on 1.0 scale) or higher as detailed in Section 140.3 of the 2013 Title 24 Part 6 (CalGreen) Building Standards.

### **Project Design Feature 7**

The project applicant shall implement Measure S-1.1 from the Climate Action Plan, which require the project applicant to contract with a waste provider that provides recycling services that diverts a minimum of 65 percent of the solid waste generated by the proposed project.

### **Project Design Feature 8**

The project applicant shall implement Measure S-1.4 from the Climate Action Plan, which requires that the building contractor recycles a minimum of 65 percent of the nonhazardous construction debris generated from construction of the proposed project. This shall be achieved by the preparation of a waste management plan for the project and a copy of the completed waste management report will be submitted to the City at the completion of construction.

## ***1.7 Mitigation Measures Required for the Proposed Project***

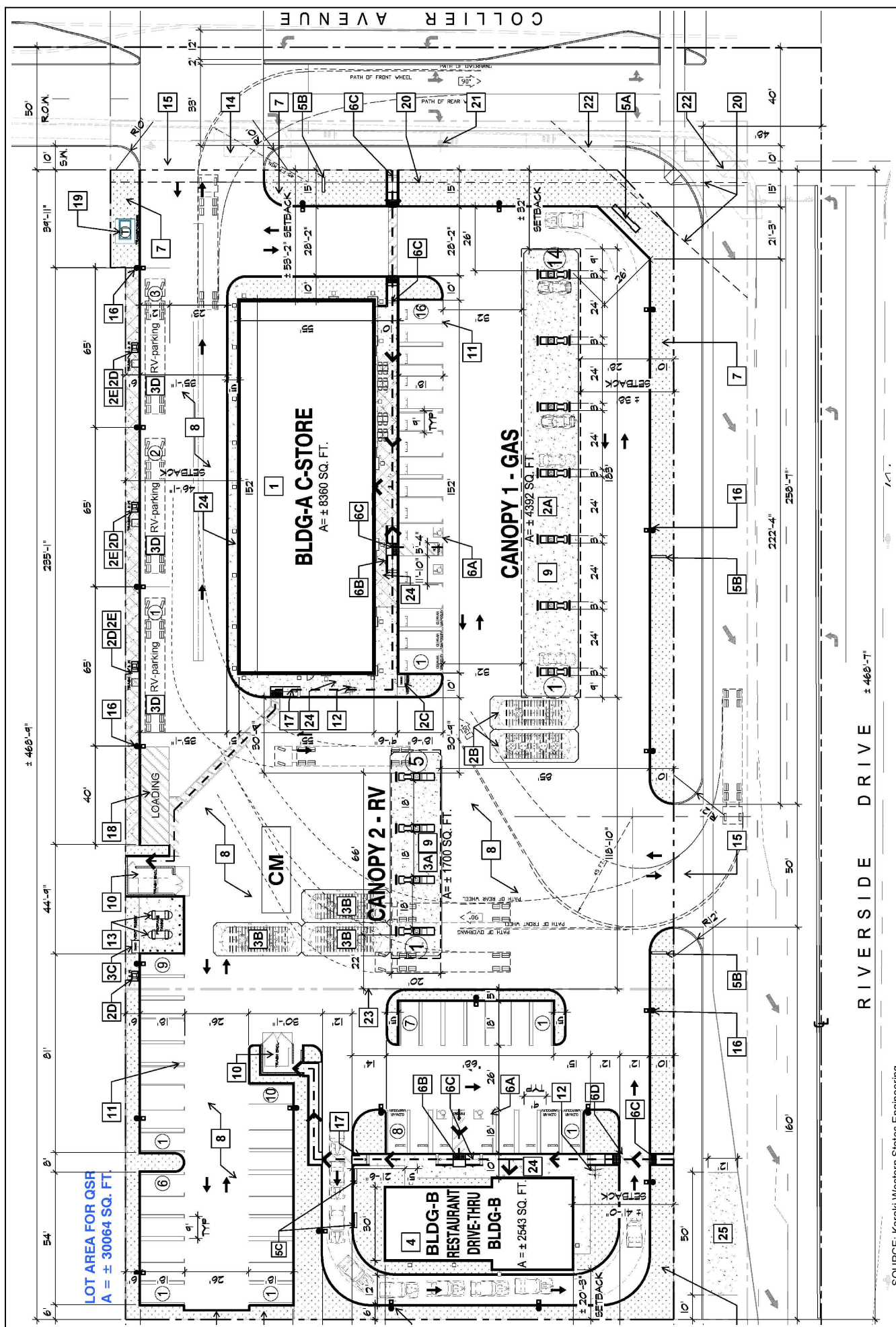
This analysis found that implementation of the State and SCAQMD air quality and GHG emissions reductions regulations plus Project Design Features 1 through 8 were adequate to limit criteria pollutants, toxic air contaminants, odors, and GHG emissions from the proposed project to less than significant levels. No mitigation measures are required for the proposed project with respect to air quality and GHG emissions.





Figure 1  
Project Local Study Area





## Figure 2 Proposed Site Plan

# VISTA ENVIRONMENTAL

 SOURCE: Karaki Western States Engineering.

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## 2.0 POLLUTANTS

Pollutants are generally classified as either criteria pollutants or non-criteria pollutants. Federal ambient air quality standards have been established for criteria pollutants, whereas no ambient standards have been established for non-criteria pollutants. For some criteria pollutants, separate standards have been set for different periods. Most standards have been set to protect public health. For some pollutants, standards have been based on other values (such as protection of crops, protection of materials, or avoidance of nuisance conditions). A summary of federal and state ambient air quality standards is provided in the Regulatory Framework section.

### 2.1 Criteria Pollutants

The criteria pollutants consist of: ozone, nitrogen oxides, carbon monoxide, sulfur oxides, lead, and particulate matter. These pollutants can harm your health and the environment, and cause property damage. The Environmental Protection Agency (EPA) calls these pollutants “criteria” air pollutants because it regulates them by developing human health-based and/or environmentally-based criteria for setting permissible levels. The following provides descriptions of each of the criteria pollutants.

#### Nitrogen Oxides

Nitrogen Oxides (NO<sub>x</sub>) is the generic term for a group of highly reactive gases which contain nitrogen and oxygen. While most NO<sub>x</sub> are colorless and odorless, concentrations of nitrogen dioxide (NO<sub>2</sub>) can often be seen as a reddish-brown layer over many urban areas. NO<sub>x</sub> form when fuel is burned at high temperatures, as in a combustion process. The primary manmade sources of NO<sub>x</sub> are motor vehicles, electric utilities, and other industrial, commercial, and residential sources that burn fuel. NO<sub>x</sub> reacts with other pollutants to form, ground-level ozone, nitrate particles, acid aerosols, as well as NO<sub>2</sub>, which cause respiratory problems. NO<sub>x</sub> and the pollutants formed from NO<sub>x</sub> can be transported over long distances, following the patterns of prevailing winds. Therefore controlling NO<sub>x</sub> is often most effective if done from a regional perspective, rather than focusing on the nearest sources.

#### Ozone

Ozone is not usually emitted directly into the air but in the vicinity of ground-level is created by a chemical reaction between NO<sub>x</sub> and volatile organic compounds (VOC) in the presence of sunlight. Motor vehicle exhaust, industrial emissions, gasoline vapors, chemical solvents as well as natural sources emit NO<sub>x</sub> and VOC that help form ozone. Ground-level ozone is the primary constituent of smog. Sunlight and hot weather cause ground-level ozone to form with the greatest concentrations usually occurring downwind from urban areas. Ozone is subsequently considered a regional pollutant. Ground-level ozone is a respiratory irritant and an oxidant that increases susceptibility to respiratory infections and can cause substantial damage to vegetation and other materials. Because NO<sub>x</sub> and VOC are ozone precursors, the health effects associated with ozone are also indirect health effects associated with significant levels of NO<sub>x</sub> and VOC emissions.

#### Carbon Monoxide

Carbon monoxide (CO) is a colorless, odorless gas that is formed when carbon in fuel is not burned completely. It is a component of motor vehicle exhaust, which contributes approximately 56 percent of all CO emissions nationwide. In cities, 85 to 95 percent of all CO emissions may come from motor vehicle exhaust. Other sources of CO emissions include industrial processes (such as metals processing and chemical manufacturing), residential wood burning, and natural sources such as forest fires. Woodstoves, gas stoves, cigarette smoke, and unvented gas and kerosene space heaters are indoor sources of CO. The highest levels of CO in the outside air typically occur during the colder months of the year when inversion conditions are more frequent. The air pollution becomes trapped near the ground beneath



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a layer of warm air. CO is described as having only a local influence because it dissipates quickly. Since CO concentrations are strongly associated with motor vehicle emissions, high CO concentrations generally occur in the immediate vicinity of roadways with high traffic volumes and traffic congestion, active parking lots, and in automobile tunnels. Areas adjacent to heavily traveled and congested intersections are particularly susceptible to high CO concentrations.

CO is a public health concern because it combines readily with hemoglobin and thus reduces the amount of oxygen transported in the bloodstream. The health threat from lower levels of CO is most serious for those who suffer from heart disease such as angina, clogged arteries, or congestive heart failure. For a person with heart disease, a single exposure to CO at low levels may cause chest pain and reduce that person's ability to exercise; repeated exposures may contribute to other cardiovascular effects. High levels of CO can affect even healthy people. People who breathe high levels of CO can develop vision problems, reduced ability to work or learn, reduced manual dexterity, and difficulty performing complex tasks. At extremely high levels, CO is poisonous and can cause death.

### **Sulfur Oxides**

Sulfur Oxide (SO<sub>x</sub>) gases are formed when fuel containing sulfur, such as coal and oil is burned, as well as from the refining of gasoline. SO<sub>x</sub> dissolves easily in water vapor to form acid and interacts with other gases and particles in the air to form sulfates and other products that can be harmful to people and the environment.

### **Lead**

Lead is a metal found naturally in the environment as well as manufactured products. The major sources of lead emissions have historically been motor vehicles and industrial sources. Due to the phase out of leaded gasoline, metal processing is now the primary source of lead emissions to the air. High levels of lead in the air are typically only found near lead smelters, waste incinerators, utilities, and lead-acid battery manufacturers. Exposure of fetuses, infants and children to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure.

### **Particulate Matter**

Particle matter (PM) is the term for a mixture of solid particles and liquid droplets found in the air. PM is made up of a number of components including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The size of particles is directly linked to their potential for causing health problems. Particles that are less than 10 micrometers in diameter (PM<sub>10</sub>) are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. Particles that are less than 2.5 micrometers in diameter (PM<sub>2.5</sub>) have been designated as a subset of PM<sub>10</sub> due to their increased negative health impacts and its ability to remain suspended in the air longer and travel further.

## ***2.2 Other Pollutants of Concern***

### **Toxic Air Contaminants**

In addition to the above-listed criteria pollutants, toxic air contaminants (TACs) are another group of pollutants of concern. Sources of TACs include industrial processes such as petroleum refining and chrome plating operations, commercial operations such as gasoline stations and dry cleaners, and motor vehicle exhaust. Cars and trucks release at least 40 different toxic air contaminants. The most important of these TACs, in terms of health risk, are diesel particulates, benzene, formaldehyde, 1,3-butadiene, and

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acetaldehyde. Public exposure to TACs can result from emissions from normal operations as well as from accidental releases. Health effects of TACs include cancer, birth defects, neurological damage, and death.

TACs are less pervasive in the urban atmosphere than criteria air pollutants, however they are linked to short-term (acute) or long-term (chronic or carcinogenic) adverse human health effects. There are hundreds of different types of TACs with varying degrees of toxicity. Sources of TACs include industrial processes, commercial operations (e.g., gasoline stations and dry cleaners), and motor vehicle exhaust.

According to *The California Almanac of Emissions and Air Quality 2013 Edition*, the majority of the estimated health risk from TACs can be attributed to relatively few compounds, the most important of which is diesel particulate matter (DPM). DPM is a subset of PM<sub>2.5</sub> because the size of diesel particles are typically 2.5 microns and smaller. The identification of DPM as a TAC in 1998 led the California Air Resources Board (CARB) to adopt the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-fueled Engines and Vehicles in September 2000. The plan's goals are a 75-percent reduction in DPM by 2010 and an 85-percent reduction by 2020 from the 2000 baseline. Diesel engines emit a complex mixture of air pollutants, composed of gaseous and solid material. The visible emissions in diesel exhaust are known as particulate matter or PM, which includes carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and over 40 other cancer-causing substances. California's identification of DPM as a toxic air contaminant was based on its potential to cause cancer, premature deaths, and other health problems. Exposure to DPM is a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. Overall, diesel engine emissions are responsible for the majority of California's potential airborne cancer risk from combustion sources.

## **Asbestos**

Asbestos is listed as a TAC by CARB and as a Hazardous Air Pollutant by the EPA. Asbestos occurs naturally in mineral formations and crushing or breaking these rocks, through construction or other means, can release asbestiform fibers into the air. Asbestos emissions can result from the sale or use of asbestos-containing materials, road surfacing with such materials, grading activities, and surface mining. The risk of disease is dependent upon the intensity and duration of exposure. When inhaled, asbestos fibers may remain in the lungs and with time may be linked to such diseases as asbestosis, lung cancer, and mesothelioma. The nearest likely locations of naturally occurring asbestos, as identified in the *General Location Guide for Ultramafic Rocks in California*, prepared by the California Division of Mines and Geology, is located in Santa Barbara County. The nearest historic asbestos mine to the project site, as identified in the *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California*, prepared by U.S. Geological Survey, is located at Asbestos Mountain, which is approximately 51 miles southeast of the project site in the San Jacinto Mountains. Due to the distance to the nearest natural occurrences of asbestos, the project site is not likely to contain asbestos.

## **2.3 Greenhouse Gases**

Constituent gases of the Earth's atmosphere, called atmospheric greenhouse gases (GHGs), play a critical role in the Earth's radiation amount by trapping infrared radiation from the Earth's surface, which otherwise would have escaped to space. Prominent greenhouse gases contributing to this process include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), ozone (O<sub>3</sub>), water vapor, nitrous oxide (N<sub>2</sub>O), and chlorofluorocarbons (CFCs). This phenomenon, known as the Greenhouse Effect, is responsible for maintaining a habitable climate. Anthropogenic (caused or produced by humans) emissions of these greenhouse gases in excess of natural ambient concentrations are responsible for the enhancement of the Greenhouse Effect and have led to a trend of unnatural warming of the Earth's natural climate, known as

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global warming or climate change. Emissions of gases that induce global warming are attributable to human activities associated with industrial/manufacturing, agriculture, utilities, transportation, and residential land uses. Transportation is responsible for 41 percent of the State's greenhouse gas emissions, followed by electricity generation. Emissions of CO<sub>2</sub> and N<sub>2</sub>O are byproducts of fossil fuel combustion. Methane, a potent greenhouse gas, results from off-gassing associated with agricultural practices and landfills. Sinks of CO<sub>2</sub>, where CO<sub>2</sub> is stored outside of the atmosphere, include uptake by vegetation and dissolution into the ocean. The following provides a description of each of the greenhouse gases and their global warming potential.

### **Water Vapor**

Water vapor is the most abundant, important, and variable GHG in the atmosphere. Water vapor is not considered a pollutant; in the atmosphere it maintains a climate necessary for life. Changes in its concentration are primarily considered a result of climate feedbacks related to the warming of the atmosphere rather than a direct result of industrialization. The feedback loop in which water is involved is critically important to projecting future climate change. As the temperature of the atmosphere rises, more water is evaporated from ground storage (rivers, oceans, reservoirs, soil). Because the air is warmer, the relative humidity can be higher (in essence, the air is able to "hold" more water when it is warmer), leading to more water vapor in the atmosphere. As a GHG, the higher concentration of water vapor is then able to absorb more thermal indirect energy radiated from the Earth, thus further warming the atmosphere. The warmer atmosphere can then hold more water vapor and so on and so on. This is referred to as a "positive feedback loop." The extent to which this positive feedback loop will continue is unknown as there is also dynamics that put the positive feedback loop in check. As an example, when water vapor increases in the atmosphere, more of it will eventually also condense into clouds, which are more able to reflect incoming solar radiation (thus allowing less energy to reach the Earth's surface and heat it up).

### **Carbon Dioxide**

The natural production and absorption of CO<sub>2</sub> is achieved through the terrestrial biosphere and the ocean. However, humankind has altered the natural carbon cycle by burning coal, oil, natural gas, and wood. Since the industrial revolution began in the mid-1700s, each of these activities has increased in scale and distribution. CO<sub>2</sub> was the first GHG demonstrated to be increasing in atmospheric concentration with the first conclusive measurements being made in the last half of the 20<sup>th</sup> century. Prior to the industrial revolution, concentrations were fairly stable at 280 parts per million (ppm). The International Panel on Climate Change (IPCC) indicates that concentrations were 379 ppm in 2005, an increase of more than 30 percent. Left unchecked, the IPCC projects that concentration of carbon dioxide in the atmosphere is projected to increase to a minimum of 540 ppm by 2100 as a direct result of anthropogenic sources. This could result in an average global temperature rise of at least two degrees Celsius or 3.6 degrees Fahrenheit.

### **Methane**

CH<sub>4</sub> is an extremely effective absorber of radiation, although its atmospheric concentration is less than that of CO<sub>2</sub>. Its lifetime in the atmosphere is brief (10 to 12 years), compared to some other GHGs (such as CO<sub>2</sub>, N<sub>2</sub>O, and Chlorofluorocarbons (CFCs)). CH<sub>4</sub> has both natural and anthropogenic sources. It is released as part of the biological processes in low oxygen environments, such as in swamplands or in rice production (at the roots of the plants). Over the last 50 years, human activities such as growing rice, raising cattle, using natural gas, and mining coal have added to the atmospheric concentration of methane. Other anthropocentric sources include fossil-fuel combustion and biomass burning.

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## Nitrous Oxide

Concentrations of N<sub>2</sub>O also began to rise at the beginning of the industrial revolution. In 1998, the global concentration of this GHG was documented at 314 parts per billion (ppb). N<sub>2</sub>O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. N<sub>2</sub>O is also commonly used as an aerosol spray propellant (i.e., in whipped cream bottles, in potato chip bags to keep chips fresh, and in rocket engines and race cars).

## Chlorofluorocarbons

CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane (C<sub>2</sub>H<sub>6</sub>) with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at the Earth's surface). CFCs have no natural source, but were first synthesized in 1928. They were used for refrigerants, aerosol propellants, and cleaning solvents. Due to the discovery that they are able to destroy stratospheric ozone, a global effort to halt their production was undertaken and in 1989 the European Community agreed to ban CFCs by 2000 and subsequent treaties banned CFCs worldwide by 2010. This effort was extremely successful, and the levels of the major CFCs are now remaining level or declining. However, their long atmospheric lifetimes mean that some of the CFCs will remain in the atmosphere for over 100 years.

## Hydrofluorocarbons

HFCs are synthetic man-made chemicals that are used as a substitute for CFCs. Out of all the GHGs, they are one of three groups with the highest global warming potential. The HFCs with the largest measured atmospheric abundances are (in order), HFC-23 (CHF<sub>3</sub>), HFC-134a (CF<sub>3</sub>CH<sub>2</sub>F), and HFC-152a (CH<sub>3</sub>CHF<sub>2</sub>). Prior to 1990, the only significant emissions were HFC-23. HFC-134a use is increasing due to its use as a refrigerant. Concentrations of HFC-23 and HFC-134a in the atmosphere are now about 10 parts per trillion (ppt) each. Concentrations of HFC-152a are about 1 ppt. HFCs are manmade for applications such as automobile air conditioners and refrigerants.

## Perfluorocarbons

Perfluorocarbons (PFCs) have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. Because of this, PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane (CF<sub>4</sub>) and hexafluoroethane (C<sub>2</sub>F<sub>6</sub>). Concentrations of CF<sub>4</sub> in the atmosphere are over 70 ppt. The two main sources of PFCs are primary aluminum production and semiconductor manufacturing.

## Sulfur Hexafluoride

Sulfur Hexafluoride (SF<sub>6</sub>) is an inorganic, odorless, colorless, nontoxic, nonflammable gas. SF<sub>6</sub> has the highest global warming potential of any gas evaluated; 23,900 times that of CO<sub>2</sub>. Concentrations in the 1990s were about 4 ppt. Sulfur hexafluoride is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

## Aerosols

Aerosols are particles emitted into the air through burning biomass (plant material) and fossil fuels. Aerosols can warm the atmosphere by absorbing and emitting heat and can cool the atmosphere by reflecting light. Cloud formation can also be affected by aerosols. Sulfate aerosols are emitted when fuel containing sulfur is burned. Black carbon (or soot) is emitted during biomass burning due to the

incomplete combustion of fossil fuels. Particulate matter regulation has been lowering aerosol concentrations in the United States; however, global concentrations are likely increasing.

## 2.4 Global Warming Potential

GHGs have varying global warming potential (GWP). The GWP is the potential of a gas or aerosol to trap heat in the atmosphere; it is the cumulative radiative forcing effects of a gas over a specified time horizon resulting from the emission of a unit mass of gas relative to the reference gas, CO<sub>2</sub>. The GHGs listed by the IPCC and the CEQA Guidelines are discussed in this section in order of abundance in the atmosphere. Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic (human-made) sources. To simplify reporting and analysis, GHGs are commonly defined in terms of their GWP. The IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of CO<sub>2</sub>e. The GWP of CO<sub>2</sub> is by definition, 1. The GWP values used in this analysis are based on the IPCC Second Assessment Report (SAR) and United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines, and are detailed in Table A. The SAR GWPs are used in CARB's California inventory and AB32 Scoping Plan estimates.

**Table A – Global Warming Potentials, Atmospheric Lifetimes and Abundances of GHGs**

Gas	Atmospheric Lifetime (years) <sup>1</sup>	Global Warming Potential (100 Year Horizon) <sup>2</sup>	Atmospheric Abundance
Carbon Dioxide (CO <sub>2</sub> )	50-200	1	379 ppm
Methane (CH <sub>4</sub> )	9-15	25	1,774 ppb
Nitrous Oxide (N <sub>2</sub> O)	114	298	319 ppb
HFC-23	270	14,800	18 ppt
HFC-134a	14	1,430	35 ppt
HFC-152a	1.4	124	3.9 ppt
PFC: Tetrafluoromethane (CF <sub>4</sub> )	50,000	7,390	74 ppt
PFC: Hexafluoroethane (C <sub>2</sub> F <sub>6</sub> )	10,000	12,200	2.9 ppt
Sulfur Hexafluoride (SF <sub>6</sub> )	3,200	22,800	5.6 ppt

Notes:

<sup>1</sup> Defined as the half-life of the gas.

<sup>2</sup> Compared to the same quantity of CO<sub>2</sub> emissions and is based on the Intergovernmental Panel On Climate Change (IPCC) 2007 standard, which is utilized in CalEEMod (Version 2016.3.2), which is used in this report (CalEEMod user guide: Appendix A).

Definitions: ppm = parts per million; ppb = parts per billion; ppt = parts per trillion

Source: IPCC 2007, EPA 2015

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## 3.0 AIR QUALITY MANAGEMENT

### 3.1 Regulatory Setting

The air quality at the project site is addressed through the efforts of various international, federal, state, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality are discussed below.

#### International

In 1988, the United Nations established the Intergovernmental Panel on Climate Change (IPCC) to evaluate the impacts of global climate change and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling GHG emissions. The parties of the UNFCCC adopted the Kyoto Protocol, which set binding GHG reduction targets for 37 industrialized countries, the objective of reducing their collective GHG emissions by five percent below 1990 levels by 2012. The Kyoto Protocol has been ratified by 182 countries, but has not been ratified by the United States. It should be noted that Japan and Canada opted out of the Kyoto Protocol and the remaining developed countries that ratified the Kyoto Protocol have not met their Kyoto targets. The Kyoto Protocol expired in 2012 and the amendment for the second commitment period from 2013 to 2020 has not yet entered into legal force. The Parties to the Kyoto Protocol negotiated the Paris Agreement in December 2015, agreeing to set a goal of limiting global warming to less than 2 degrees Celsius compared with pre-industrial levels. The Paris Agreement has been adopted by 195 nations with 147 ratifying it, including the United States by President Obama, who ratified it by Executive Order on September 3, 2016. On June 1, 2017, President Trump announced that the United States is withdrawing from the Paris Agreement, however the Paris Agreement is still legally binding by the other remaining nations.

Additionally, the Montreal Protocol was originally signed in 1987 and substantially amended in 1990 and 1992. The Montreal Protocol stipulates that the production and consumption of compounds that deplete ozone in the stratosphere—CFCs, halons, carbon tetrachloride, and methyl chloroform—were to be phased out, with the first three by the year 2000 and methyl chloroform by 2005.

#### Federal – United States Environmental Protection Agency

The Clean Air Act, first passed in 1963 with major amendments in 1970, 1977 and 1990, is the overarching legislation covering regulation of air pollution in the United States. The Clean Air Act has established the mandate for requiring regulation of both mobile and stationary sources of air pollution at the state and federal level. The Environmental Protection Agency (EPA) was created in 1970 in order to consolidate research, monitoring, standard-setting and enforcement authority into a single agency.

The EPA is responsible for setting and enforcing the National Ambient Air Quality Standards (NAAQS) for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. NAAQS pollutants were identified using medical evidence and are shown below in [Table B-Table B](#).



**Table B – State and Federal Criteria Pollutant Standards**

Air Pollutant	Concentration / Averaging Time		Most Relevant Effects
	California Standards	Federal Primary Standards	
Ozone (O <sub>3</sub> )	0.09 ppm / 1-hour 0.07 ppm / 8-hour	0.070 ppm, / 8-hour	(a) Pulmonary function decrements and localized lung edema in humans and animals; (b) Risk to public health implied by alterations in pulmonary morphology and host defense in animals; (c) Increased mortality risk; (d) Risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (e) Vegetation damage; and (f) Property damage.
Carbon Monoxide (CO)	20.0 ppm / 1-hour 9.0 ppm / 8-hour	35.0 ppm / 1-hour 9.0 ppm / 8-hour	(a) Aggravation of angina pectoris and other aspects of coronary heart disease; (b) Decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (c) Impairment of central nervous system functions; and (d) Possible increased risk to fetuses.
Nitrogen Dioxide (NO <sub>2</sub> )	0.18 ppm / 1-hour 0.030 ppm / annual	100 ppb / 1-hour 0.053 ppm / annual	(a) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (b) Risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (c) Contribution to atmospheric discoloration.
Sulfur Dioxide (SO <sub>2</sub> )	0.25 ppm / 1-hour 0.04 ppm / 24-hour	75 ppb / 1-hour 0.14 ppm/annual	(a) Bronchoconstriction accompanied by symptoms which may include wheezing, shortness of breath and chest tightness, during exercise or physical activity in persons with asthma.
Suspended Particulate Matter (PM <sub>10</sub> )	50 µg/m <sup>3</sup> / 24-hour 20 µg/m <sup>3</sup> / annual	150 µg/m <sup>3</sup> / 24-hour	(a) Exacerbation of symptoms in sensitive patients with respiratory or cardiovascular disease; (b) Declines in pulmonary function growth in children; and (c) Increased risk of premature death from heart or lung diseases in elderly.
Suspended Particulate Matter (PM <sub>2.5</sub> )	12 µg/m <sup>3</sup> / annual	35 µg/m <sup>3</sup> / 24-hour 12 µg/m <sup>3</sup> / annual	
Sulfates	25 µg/m <sup>3</sup> / 24-hour	No Federal Standards	(a) Decrease in ventilatory function; (b) Aggravation of asthmatic symptoms; (c ) Aggravation of cardio-pulmonary disease; (d) Vegetation damage; (e) Degradation of visibility; and (f) Property damage.
Lead	1.5 µg/m <sup>3</sup> / 30-day	0.15 µg/m <sup>3</sup> / 3-month rolling	(a) Learning disabilities; and (b) Impairment of blood formation and nerve conduction.
Visibility Reducing Particles	Extinction coefficient of 0.23 per kilometer - visibility of ten miles or more due to particles when relative humidity is less than 70 percent.	No Federal Standards	Visibility impairment on days when relative humidity is less than 70 percent.

Source: <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>.

As part of its enforcement responsibilities, the EPA requires each state with federal nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the national standards. The SIP must integrate federal, state, and local components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based

programs within the timeframe identified in the SIP. The CARB defines attainment as the category given to an area with no violations in the past three years. As indicated below in [Table C](#), the Air Basin has been designated by EPA for the national standards as a non-attainment area for ozone (O<sub>3</sub>) and suspended particulates (PM<sub>10</sub> and PM<sub>2.5</sub>) and partial non-attainment for lead. Currently, the Air Basin is in attainment with the national ambient air quality standards for carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and nitrogen dioxide (NO<sub>2</sub>).

**Table C – South Coast Air Basin Attainment Status**

Criteria Pollutant	Standard	Averaging Time	Designation <sup>a)</sup>	Attainment Date <sup>b)</sup>
1-Hour Ozone	NAAQS	1979 1-Hour (0.12 ppm)	Nonattainment (Extreme)	2/6/2023 Originally 11/15/2010 (not attained) <sup>c)</sup>
	CAAQS	1-Hour (0.09 ppm)	Nonattainment	N/A
8-Hour Ozone <sup>d)</sup>	NAAQS	1997 8-Hour (0.08 ppm)	Nonattainment (Extreme)	6/15/2024
	NAAQS	2008 8-Hour (0.075 ppm)	Nonattainment (Extreme)	7/20/2032
	NAAQS	2015 8-Hour (0.070 ppm)	Designations Pending	~2037
	CAAQS	8-Hour (0.070 ppm)	Nonattainment	Beyond 2032
CO	NAAQS	1-Hour (35 ppm) 8-Hour (9 ppm)	Attainment (Maintenance)	6/11/2007 (attained)
	CAAQS	1-Hour (20 ppm) 8-Hour (9 ppm)	Attainment	6/11/2007 (attained)
NO <sub>2</sub> <sup>e)</sup>	NAAQS	1-Hour (0.10 ppm)	Unclassifiable/ Attainment	N/A (attained)
	NAAQS	Annual (0.053 ppm)	Attainment (Maintenance)	9/22/1998 (attained)
	CAAQS	1-Hour (0.18 ppm) Annual (0.030 ppm)	Attainment	---
SO <sub>2</sub> <sup>f)</sup>	NAAQS	1-Hour (75 ppb)	Designations Pending (expect Unclassifiable/ Attainment)	N/A (attained)
	NAAQS	24-Hour (0.14 ppm) Annual (0.03 ppm)	Unclassifiable/ Attainment	3/19/1979 (attained)
PM <sub>10</sub>	NAAQS	1987 24-hour (150 µg/m <sup>3</sup> )	Attainment (Maintenance) <sup>g)</sup>	7/26/2013 (attained)
	CAAQS	24-hour (50 µg/m <sup>3</sup> ) Annual (20 µg/m <sup>3</sup> )	Nonattainment	N/A
PM <sub>2.5</sub> <sup>h)</sup>	NAAQS	2006 24-Hour (35 µg/m <sup>3</sup> )	Nonattainment (Serious)	12/31/2019
	NAAQS	1997 Annual (15.0 µg/m <sup>3</sup> )	Nonattainment	4/5/2015
	NAAQS	2012 Annual (12.0 µg/m <sup>3</sup> )	Nonattainment (Serious)	12/31/2025
	CAAQS	Annual (12.0 µg/m <sup>3</sup> )	Nonattainment	N/A
Lead	NAAQS	3-Months Rolling (0.15 µg/m <sup>3</sup> )	Nonattainment (Partial)	12/31/2015

Source: SCAQMD, February 2016

Notes:

a) U.S. EPA often only declares Nonattainment areas; everywhere else is listed as Unclassifiable/Attainment or Unclassifiable

b) A design value below the NAAQS for data through the full year or smog season prior to the attainment date is typically required for attainment demonstration

c) 1-hour O<sub>3</sub> standard (0.12 ppm) was revoked, effective June 15, 2005; however, the Basin has not attained this standard based on 2008-2010 data and is still subject to anti-backsliding requirements



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- d) 1997 8-hour O<sub>3</sub> standard (0.08 ppm) was reduced (0.075 ppm), effective May 27, 2008; the revoked 1997 O<sub>3</sub> standard is still subject to anti-backsliding requirements
- e) New NO<sub>2</sub> 1-hour standard, effective August 2, 2010; attainment designations January 20, 2012; annual NO<sub>2</sub> standard retained
- f) The 1971 annual and 24-hour SO<sub>2</sub> standards were revoked, effective August 23, 2010; however, these 1971 standards will remain in effect until one year after U.S. EPA promulgates area designations for the 2010 SO<sub>2</sub> 1-hour standard. Area designations are still pending, with Basin expected to be designated Unclassifiable /Attainment.
- g) Annual PM<sub>10</sub> standard was revoked, effective December 18, 2006; 24-hour PM<sub>10</sub> NAAQS deadline was 12/31/2006; SCAQMD request for attainment redesignation and PM<sub>10</sub> maintenance plan was approved by U.S. EPA on June 26, 2013, effective July 26, 2013.
- h) Attainment deadline for the 2006 24-Hour PM<sub>2.5</sub> NAAQS (designation effective December 14, 2009) is December 31, 2019 (end of the 10th calendar year after effective date of designations for Serious nonattainment areas). Annual PM<sub>2.5</sub> standard was revised on January 15, 2013, effective March 18, 2013, from 15 to 12 µg/m<sup>3</sup>. Designations effective April 15, 2015, so Serious area attainment deadline is December 31, 2025.
- i) Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect to remain in attainment based on current monitoring data.

In 2011, the Air Basin exceeded federal standards for either ozone or PM<sub>2.5</sub> at one or more locations on a total of 124 days, based on the current federal standards for 8-hour ozone and 24-hour PM<sub>2.5</sub>. Despite substantial improvements in air quality over the past few decades, some air monitoring stations in the Air Basin still exceed the NAAQS for ozone more frequently than any other stations in the U.S. In 2011, three of the top five stations that exceeded the 8-hour ozone NAAQS were located in the Air Basin (Central San Bernardino Mountains, East San Bernardino Valley, and Metropolitan Riverside County). (SCAQMD 2012)

PM<sub>2.5</sub> in the Air Basin has improved significantly in recent years, with 2010 and 2011 being the cleanest years on record. In 2011, only one station in the Air Basin (Metropolitan Riverside County at Mira Loma) exceeded the annual PM<sub>2.5</sub> NAAQS and the 98<sup>th</sup> percentile form of the 24-hour PM<sub>2.5</sub> NAAQS, as well as the 3-year design values for these standards. Basin-wide, the federal PM<sub>2.5</sub> 24-hour standard level was exceeded in 2011 on 17 sampling days. (SCAQMD 2012)

The Air Basin is currently in attainment for the federal standards for NO<sub>2</sub>. While the concentration level of the new 1-hour NO<sub>2</sub> federal standard (100 ppb) was exceeded in the Air Basin at two stations (Central Los Angeles and Long Beach) on the same day in 2011, the NAAQS NO<sub>2</sub> design value has not been exceeded. (SCAQMD 2012) Therefore, the Basin remains in attainment of the NO<sub>2</sub> NAAQS.

Although much of the South Coast Air Basin, including the proposed site location of Riverside County, is in attainment for lead, the EPA designated the Los Angeles County portion of the Air Basin as nonattainment for the revised (2008) federal lead standard (0.15 µg/m<sup>3</sup>, rolling 3-month average). This was due to the addition of source-specific monitoring under the new federal regulation. This designation was based on two source-specific monitors in Vernon and the City of Industry exceeding the revised standard in the 2007-2009 period of data used. As of the 2009-2011 data period, only one of these stations (Vernon) still exceeded the lead standard. The *2012 Lead State Implementation Plan Los Angeles County*, prepared by SCAQMD and adopted on May 4, 2012, provided measures to meet attainment of lead by December 31, 2015. Current monitoring data shows that lead is now below the standards at all monitoring stations, however it will take three years of meeting the standards before Los Angeles County can request to be re-designated by the EPA.

In *Massachusetts v. Environmental Protection Agency* (Docket No. 05–1120), argued November 29, 2006 and decided April 2, 2007, the U.S. Supreme Court held that not only did the EPA have authority to regulate greenhouse gases, but the EPA's reasons for not regulating this area did not fit the statutory requirements. As such, the U.S. Supreme Court ruled that the EPA should be required to regulate CO<sub>2</sub> and other greenhouse gases as pollutants under the federal Clean Air Act (CAA).

In response to the FY2008 Consolidations Appropriations Act (H.R. 2764; Public Law 110-161), EPA proposed a rule on March 10, 2009 that requires mandatory reporting of GHG emissions from large sources in the United States. On September 22, 2009, the Final Mandatory Reporting of GHG Rule was

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signed and published in the Federal Register on October 30, 2009. The rule became effective on December 29, 2009. This rule requires suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines, and facilities that emit 25,000 metric tons or more per year of GHG emissions to submit annual reports to EPA.

On December 7, 2009, the EPA Administrator signed two distinct findings under section 202(a) of the Clean Air Act. One is an endangerment finding that finds concentrations of the six GHGs in the atmosphere threaten the public health and welfare of current and future generations. The other is a cause or contribute finding, that finds emissions from new motor vehicles and new motor vehicle engines contribute to the GHG pollution which threatens public health and welfare. These actions did not impose any requirements on industry or other entities, however, since 2009 the EPA has been providing GHG emission standards for vehicles and other stationary sources of GHG emissions that are regulated by the EPA. On September 13, 2013 the EPA Administrator signed 40 CFR Part 60, that limits emissions from new sources to 1,100 pounds of CO<sub>2</sub> per MWh for fossil fuel-fired utility boilers and 1,000 pounds of CO<sub>2</sub> per MWh for large natural gas-fired combustion units.

On August 3, 2015, the EPA announced the Clean Power Plan, emissions guidelines for U.S. states to follow in developing plans to reduce GHG emissions from existing fossil fuel-fired power plants (Federal Register Vol. 80, No. 205, October 23 2015). On February 9, 2016 the Supreme Court stayed implementation of the Clean Power Plan due to a legal challenge from 29 states and in April 2017, the Supreme Court put the case on hold and directed both sides to make arguments for whether it should keep the case on hold indefinitely or close it and remand the issue to the EPA. On August 21, 2018 the EPA released the Affordable Clean Energy Rule, which usurps the Clean Power plan and returns most of the decision making authority for power plant emissions back to the States.

### **State – California Air Resources Board**

The California Air Resources Board (CARB), which is a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the CARB conducts research, sets the California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. The CAAQS for criteria pollutants are shown above in [Table B-Table B](#). In addition, the CARB establishes emission standards for motor vehicles sold in California, consumer products (e.g. hairspray, aerosol paints, and barbeque lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

The Air Basin has been designated by the CARB as a non-attainment area for ozone, PM<sub>10</sub>, PM<sub>2.5</sub> and lead. Currently, the South Coast Air Basin is in attainment with the ambient air quality standards for CO, NO<sub>2</sub>, SO<sub>2</sub>, and sulfates and is unclassified for visibility reducing particles and Hydrogen Sulfide.

In 2008 the CARB adopted Resolution 08-43, which limits NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions from on-road diesel truck fleets that operate in California. In 2009 Executive Order R-09-010 was adopted that codified Resolution 08-43 into Section 2025, title 13 of the California Code of Regulations. This regulation requires that by the year 2023 all commercial diesel trucks that operate in California shall meet model year 2010 (Tier 4 Final) or latter emission standards. In the interim period, this regulation provides annual interim targets for fleet owners to meet. This regulation also provides a few exemptions including a onetime per year 3-day pass for trucks registered outside of California.

CARB is also responsible for regulations pertaining to Toxic Air Contaminants (TACs). The Air Toxics “Hot Spots” Information and Assessment Act (Assembly Bill [AB] 2588, 1987, Connelly) was enacted in

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1987 as a means to establish a formal air toxics emission inventory risk quantification program. AB 2588, as amended, establishes a process that requires stationary sources to report the type and quantities of certain substances their facilities routinely release in California. The data is ranked by high, intermediate, and low categories, which are determined by: the potency, toxicity, quantity, volume, and proximity of the facility to nearby receptors.

CARB also proposed interim statewide CEQA thresholds for GHG emissions and released *Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act*, on October 24, 2008 that has been utilized by the SCAQMD's GHG Significance Threshold Stakeholder Working Group in their framework for developing SCAQMD's draft GHG emissions thresholds. The State currently has no regulations that establish ambient air quality standards for GHGs. However, the State has passed laws directing CARB to develop actions to reduce GHG emissions, which are listed below.

#### Executive Order B-30-15, Senate Bill 32 and Assembly Bill 197

The California Governor issued Executive Order B-30-15 on April 29, 2015 that aims to reduce California's GHG emissions 40 percent below 1990 levels by 2030. This executive order aligns California's GHG reduction targets with those of other international governments, such as the European Union that set the same target for 2030 in October, 2014. This target will make it possible to reach the ultimate goal of reducing GHG emissions 80 percent under 1990 levels by 2050 that is based on scientifically established levels needed in the U.S.A to limit global warming below 2 degrees Celsius – the warming threshold at which scientists say there will likely be major climate disruptions such as super droughts and rising sea levels. Assembly Bill 197 (AB 197) (September 8, 2016) and Senate Bill 32 (SB 32) (September 8, 2016) codified into statute the GHG emissions reduction targets of at least 40 percent below 1990 levels by 2030 as detailed in EO B-30-15. AB 197 also requires additional GHG emissions reporting that is broken down to sub-county levels and requires CARB to consider the social costs of emissions impacting disadvantaged communities.

#### Executive Order B-29-15

The California Governor issued Executive Order B-29-15 on April 1, 2015 and directed the State Water Resources Control Board to impose restrictions to achieve a statewide 25% reduction in urban water usage and directed the Department of Water Resources to replace 50 million square feet of lawn with drought tolerant landscaping through an update to the State's Model Water Efficient Landscape Ordinance. The Ordinance also requires installation of more efficient irrigation systems, promotion of greywater usage and onsite stormwater capture, and limits the turf planted in new residential landscapes to 25 percent of the total area and restricts turf from being planted in median strips or in parkways unless the parkway is next to a parking strip and a flat surface is required to enter and exit vehicles. Executive Order B-29-15 would reduce GHG emissions associated with the energy used to transport and filter water.

#### Assembly Bill 1109

California Assembly Bill 1109 (AB 1109), which also known as the Lighting Efficiency and Toxics Reduction Act, prohibits the manufacturing of lights after January 1, 2010 that contain levels of hazardous substances prohibited by the European Union pursuant to the RoHS Directive. AB 1109 also requires reductions in energy usage for lighting and is structured to reduce lighting electrical consumption by: (1) At least 50 percent reduction from 2007 levels for indoor residential lighting; and (2) At least 25 percent reduction from 2007 levels for indoor commercial and all outdoor lighting by 2018. AB 1109 would reduce GHG emissions through reducing the amount of electricity required to be generated by fossil fuels in California.

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### Assembly Bill 1493

California Assembly Bill 1493 (also known as the Pavley Bill, in reference to its author Fran Pavley) was enacted on July 22, 2002 and required CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light duty trucks. In 2004, CARB approved the “Pavley I” regulations limiting the amount of GHGs that may be released from new passenger automobiles that are being phased in between model years 2009 through 2016. These regulations will reduce GHG emissions by 30 percent from 2002 levels by 2016. The second set of regulations “Pavley II” is currently in development and will be phased in between model years 2017 through 2025 and will reduce emissions by 45 percent by the year 2020 as compared to the 2002 fleet. The Pavley II standards are being developed by linking the GHG emissions and formerly separate toxic tailpipe emissions standards previously known as the “LEV III” (third stage of the Low Emission Vehicle standards) into a single regulatory framework. The new rules reduce emissions from gasoline-powered cars as well as promote zero-emissions auto technologies such as electricity and hydrogen, and through increasing the infrastructure for fueling hydrogen vehicles. In 2009, the U.S. EPA granted California the authority to implement the GHG standards for passenger cars, pickup trucks and sport utility vehicles. In September 2009, the Pavley I regulations were adopted by CARB.

### Executive Order S-3-05

In 2005 the California Governor issued Executive Order S 3-05, GHG Emission, which established the following reduction targets:

- 2010: Reduce greenhouse gas emissions to 2000 levels;
- 2020: Reduce greenhouse gas emissions to 1990 levels;
- 2050: Reduce greenhouse gas emissions to 80 percent below 1990 levels.

The executive order directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. To comply with the Executive Order, the secretary of CalEPA created the California Climate Action Team (CAT), made up of members from various state agencies and commissions. The team released its first report in March 2006. The report proposed to achieve the targets by building on the voluntary actions of businesses, local governments, and communities and through State incentive and regulatory programs. The State achieved its first goal of reducing greenhouse gas emissions to 2000 levels by 2010.

### Assembly Bill 32

In 2006, the California State Legislature adopted Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 requires CARB, to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020 through an enforceable statewide emission cap which will be phased in starting in 2012. Emission reductions shall include carbon sequestration projects that would remove carbon from the atmosphere and utilize best management practices that are technologically feasible and cost effective.

In 2007 CARB released the calculated Year 1990 GHG emissions of 431 million metric tons of CO<sub>2</sub>e (MMTCO<sub>2</sub>e). The 2020 target of 431 MMTCO<sub>2</sub>e requires the reduction of 78 MMTCO<sub>2</sub>e, or approximately 16 percent from the State’s projected 2020 business as usual emissions of 509 MMTCO<sub>2</sub>e (CARB, 2014). Under AB 32, CARB was required to adopt regulations by January 1, 2011 to achieve reductions in GHGs to meet the 1990 cap by 2020. Early measures CARB took to lower GHG emissions included requiring operators of the largest industrial facilities that emit 25,000 metric tons of CO<sub>2</sub> in a calendar year to submit verification of GHG emissions by December 1, 2010. The CARB Board also approved nine discrete early action measures that include regulations affecting landfills, motor vehicle

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fuels, refrigerants in cars, port operations and other sources, all of which became enforceable on or before January 1, 2010.

CARB's Scoping Plan that was adopted in 2009, proposes a variety of measures including: strengthening energy efficiency and building standards; targeted fees on water and energy use; a market-based cap-and-trade system; achieving a 33 percent renewable energy mix; and a fee regulation to fund the program. The 2014 update to the Scoping Plan identifies strategies moving beyond the 2020 targets to the year 2050. The California's 2017 Climate Change Scoping Plan that was adopted in November 2017, is the second update to the Scoping Plan and provides specific statewide policies and measures to achieve the 2030 GHG reduction targets adopted in AB 197 and SB 32 as well as the aspirational 2050 reduction target provided in Executive Order B-30-15.

The Cap and Trade Program established under the Scoping Plan sets a statewide limit on sources responsible for 85 percent of California's GHG emissions, and has established a market for long-term investment in energy efficiency and cleaner fuels since 2012.

#### Senate Bill 1368

Senate Bill 1368 (SB 1368) is the companion Bill of AB 32 and was adopted September 2006. SB 1368 requires that the California Public Utilities Commission (CPUC) establish a performance standard for baseload generation of GHG emissions by investor-owned utilities by February 1, 2007 and for local publicly owned utilities by June 30, 2007. These standards could not exceed the GHG emissions rate from a baseload combined-cycle, natural gas-fired plant. Furthermore, the legislation states that all electricity provided to the State, including imported electricity, must be generated by plants that meet the standards set by CPUC and California Energy Commission (CEC).

#### Executive Order S-1-07

Executive Order S-1-07 was issued in 2007 and proclaims that the transportation sector is the main source of GHG emissions in the State, since it generates more than 40 percent of the State's GHG emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in the State by at least ten percent by 2020. This Order also directs CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in AB 32.

In 2009 CARB approved the proposed regulation to implement the low carbon fuel standard. The standard was challenged in the courts, but has been in effect since 2011 and was re-approved by the CARB in 2015. The low carbon fuel standard is anticipated to reduce GHG emissions by about 16 MMT per year by 2020. The low carbon fuel standard is designed to provide a framework that uses market mechanisms to spur the steady introduction of lower carbon fuels. The framework establishes performance standards that fuel producers and importers must meet annually. Reformulated gasoline mixed with corn-derived ethanol and low-sulfur diesel fuel represent the baseline fuels. Lower carbon fuels may be ethanol, biodiesel, renewable diesel, or blends of these fuels with gasoline or diesel. Compressed natural gas and liquefied natural gas also may be low-carbon fuels. Hydrogen and electricity, when used in fuel cells or electric vehicles, are also considered as low-carbon fuels.

#### Senate Bill 97

Senate Bill 97 (SB 97) was adopted August 2007 and acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. SB 97 directed the Governor's Office of Planning and Research (OPR), which is part of the State Natural Resources Agency, to prepare, develop, and transmit to CARB guidelines for the feasible mitigation of GHG emissions or the effects of GHG



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emissions, as required by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify and adopt those guidelines by January 1, 2010.

Pursuant to the requirements of SB 97 as stated above, on December 30, 2009 the Natural Resources Agency adopted amendments to the State CEQA guidelines that address GHG emissions. The CEQA Guidelines Amendments changed 14 sections of the CEQA Guidelines and incorporated GHG language throughout the Guidelines. However, no GHG emissions thresholds of significance were provided and no specific mitigation measures were identified. The GHG emission reduction amendments went into effect on March 18, 2010 and are summarized below:

- Climate action plans and other greenhouse gas reduction plans can be used to determine whether a project has significant impacts, based upon its compliance with the plan.
- Local governments are encouraged to quantify the greenhouse gas emissions of proposed projects, noting that they have the freedom to select the models and methodologies that best meet their needs and circumstances. The section also recommends consideration of several qualitative factors that may be used in the determination of significance, such as the extent to which the given project complies with state, regional, or local GHG reduction plans and policies. OPR does not set or dictate specific thresholds of significance. Consistent with existing CEQA Guidelines, OPR encourages local governments to develop and publish their own thresholds of significance for GHG impacts assessment.
- When creating their own thresholds of significance, local governments may consider the thresholds of significance adopted or recommended by other public agencies, or recommended by experts.
- New amendments include guidelines for determining methods to mitigate the effects of greenhouse gas emissions in Appendix F of the CEQA Guidelines.
- OPR is clear to state that “to qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project; general compliance with a plan, by itself, is not mitigation.”
- OPR’s emphasizes the advantages of analyzing GHG impacts on an institutional, programmatic level. OPR therefore approves tiering of environmental analyses and highlights some benefits of such an approach.
- Environmental impact reports (EIRs) must specifically consider a project's energy use and energy efficiency potential.

#### Senate Bill 350

Senate Bill 350 (SB 350) was adopted October 2015 in order to implement the goals of Executive Order B-30-15. SB 350 increases the State’s renewable electricity procurement goal from 33 percent by 2020 to 50 percent by 2030. In addition SB 350 requires the State to double statewide energy efficiency savings for both electricity and natural gas uses by 2030. SB 350 is being implemented by requiring all large utilities to develop and submit Integrated Resource Plans that detail how they will meet their customers energy needs, reduce GHG emissions and deploy clean energy resources. SB 350 superseded the renewable energy requirements set by SB 1078, SB 107, and SB X1-2.

#### Senate Bill 375

Senate Bill 375 (SB 375) was adopted September 2008 in order to support the State’s climate action goals to reduce GHG emissions through coordinated regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires CARB to set regional

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targets for GHG emissions reductions from passenger vehicle use. In 2010, CARB established targets for 2020 and 2035 for each Metropolitan Planning Organizations (MPO) within the State. It was up to each MPO to adopt a sustainable communities strategy (SCS) that will prescribe land use allocation in that MPOs Regional Transportation Plan (RTP) to meet CARB's 2020 and 2035 GHG emission reduction targets. These reduction targets are required to be updated every eight years and in June 2017 CARB released *Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Target*, which provides recommended GHG emissions reduction targets for SCAG of 8 percent by 2020 and 21 percent by 2035.

The 2016-2040 *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS), adopted by SCAG April, 2016 provides a 2020 GHG emission reduction target of 8 percent and a 2035 GHG emission reduction target of 18 percent. SCAG will need to develop additional strategies in its next revision of the RTP/SCS in order to meet CARB's new 21 percent GHG emission reduction target for 2035. CARB is also charged with reviewing SCAG's RTP/SCS for consistency with its assigned targets.

City and County land use policies, including General Plans, are not required to be consistent with the RTP and associated SCS. However, new provisions of CEQA incentivize, through streamlining and other provisions, qualified projects that are consistent with an approved SCS and categorized as "transit priority projects."

#### Assembly Bill 341 and Senate Bills 939 and 1374

Senate Bill 939 (SB 939) requires that each jurisdiction in California to divert at least 50 percent of its waste away from landfills, whether through waste reduction, recycling or other means. Senate Bill 1374 (SB 1374) requires the California Integrated Waste Management Board to adopt a model ordinance by March 1, 2004 suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition of waste materials from landfills. Assembly Bill 341 (AB 341) was adopted in 2011 and builds upon the waste reduction measures of SB 939 and 1374, and sets a new target of a 75 percent reduction in solid waste generated by the year 2020.

#### California Code of Regulations (CCR) Title 24, Part 6

CCR Title 24, Part 6: *California's Energy Efficiency Standards for Residential and Nonresidential Buildings* (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

Title 24 standards are updated on a three-year schedule and the most current 2016 standards went into effect on January 1, 2017. The Title 24 standards require the installation of insulated hot water pipes, improved window performance, improved wall insulation, and mandatory duct sealing. Title 24 also requires roofs to be constructed to be solar ready, with cool roofing shingles, a minimum 1-inch air space between roof material and roof deck, and a minimum of R-22 roof/ceiling insulation. All lighting is required to be high efficiency and daylight sensors and motion sensors are required for outdoor lighting, bathrooms, utility rooms and other spaces. The forced air systems are required to limit leakage to 5 percent or less and requires all heat pump systems to be equipped with liquid line filter driers. The 2016 Title 24 Part 6 standards are anticipated to reduce electricity consumption by 281 gigawatt-hours per year and natural gas consumption by 16 million therms per year (<http://www.energy.ca.gov/2015publications/CEC-400-2015-037/CEC-400-2015-037-CMF.pdf>).

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## California Code of Regulations (CCR) Title 24, Part 11

CCR Title 24, Part 11: *California Green Building Standards* (Title 24) was developed in response to continued efforts to reduce GHG emissions associated with energy consumption. The most current version is the 2016 California Green Building Standards Code (CalGreen), which became effective on January 1, 2017 and replaced the 2013 CalGreen.

The CALGreen Code contains requirements for construction site selection; storm water control during construction; construction waste reduction; indoor water use reduction; material selection; natural resource conservation; site irrigation conservation; and more. The code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The code also requires building commissioning, which is a process for verifying that all building systems (e.g., heating and cooling equipment and lighting systems) are functioning at their maximum efficiency.

The CALGreen Code provides standards for bicycle parking, carpool/vanpool/electric vehicle spaces, light and glare reduction, grading and paving, energy efficient appliances, renewable energy, graywater systems, water efficient plumbing fixtures, recycling and recycled materials, pollutant controls (including moisture control and indoor air quality), acoustical controls, storm water management, building design, insulation, flooring, and framing, among others. Implementation of the CALGreen Code measures reduces energy consumption and vehicle trips and encourages the use of alternative-fuel vehicles, which reduces pollutant emissions.

Some of the notable changes in the 2016 CALGreen Code over the prior 2013 CALGreen Code include: an increase in amount of bicycle parking requirements; an increase in number of EV charging stations and clean air vehicle parking at non-residential buildings; a reduction in water usage in urinals to 0.125 gallons per flush; an increased rate of diversion for construction and operational waste to 65 percent as well as adding organic waste as waste to be diverted; and a requirement for fireplaces to meet new EPA standards.

## **Regional**

The SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin. To that end, as a regional agency, the SCAQMD works directly with the Southern California Association of Governments (SCAG), county transportation commissions, and local governments and cooperates actively with all federal and state agencies.

## South Coast Air Quality Management District

SCAQMD develops rules and regulations, establishes permitting requirements for stationary sources, inspects emission sources, and enforces such measures through educational programs or fines, when necessary. SCAQMD is directly responsible for reducing emissions from stationary, mobile, and indirect sources. It has responded to this requirement by preparing a sequence of AQMPs. The *Final 2016 Air Quality Management Plan* (2016 AQMP) was adopted by the SCAQMD Board on March 3, 2016 and was adopted by CARB on March 23, 2017 for inclusion into the California State Implementation Plan (SIP). The 2016 AQMP was prepared in order to meet the following standards:

- 8-hour Ozone (75 ppb) by 2032
- Annual PM<sub>2.5</sub> (12 µg/m<sup>3</sup>) by 2021-2025
- 8-hour Ozone (80 ppb) by 2024 (updated from the 2007 and 2012 AQMPs)
- 1-hour Ozone (120 ppb) by 2023 (updated from the 2012 AQMP)
- 24-hour PM<sub>2.5</sub> (35 µg/m<sup>3</sup>) by 2019 (updated from the 2012 AQMP)



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In addition to meeting the above standards, the 2016 AQMP also includes revisions to the attainment demonstrations for the 1997 8-hour ozone NAAQS and the 1979 1-hour ozone NAAQS. The prior 2012 AQMP was prepared in order to demonstrate attainment with the 24-hour PM<sub>2.5</sub> standard by 2014 through adoption of all feasible measures. The prior 2007 AQMP demonstrated attainment with the 1997 8-hour ozone (80 ppb) standard by 2023, through implementation of future improvements in control techniques and technologies. These “black box” emissions reductions represent 65 percent of the remaining NO<sub>x</sub> emission reductions by 2023 in order to show attainment with the 1997 8-hour ozone NAAQS. Given the magnitude of these needed emissions reductions, additional NO<sub>x</sub> control measures have been provided in the 2012 AQMP even though the primary purpose was to show compliance with 24-hour PM<sub>2.5</sub> emissions standards.

The 2016 AQMP provides a new approach that focuses on available, proven and cost effective alternatives to traditional strategies, while seeking to achieve multiple goals in partnership with other entities to promote reductions in GHG emissions and TAC emissions as well as efficiencies in energy use, transportation, and goods movement. The 2016 AQMP recognizes the critical importance of working with other agencies to develop funding and other incentives that encourage the accelerated transition of vehicles, buildings and industrial facilities to cleaner technologies in a manner that benefits not only air quality, but also local businesses and the regional economy.

Although SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate air quality issues associated with plans and new development projects throughout the Air Basin. Instead, this is controlled through local jurisdictions in accordance to the California Environmental Quality Act (CEQA). In order to assist local jurisdictions with air quality compliance issues the *CEQA Air Quality Handbook* (SCAQMD CEQA Handbook), prepared by SCAQMD, 1993, with the most current updates found at <http://www.aqmd.gov/ceqa/hdbk.html>, was developed in accordance with the projections and programs detailed in the AQMPs. The purpose of the SCAQMD CEQA Handbook is to assist Lead Agencies, as well as consultants, project proponents, and other interested parties in evaluating a proposed project’s potential air quality impacts. Specifically, the SCAQMD CEQA Handbook explains the procedures that SCAQMD recommends be followed for the environmental review process required by CEQA. The SCAQMD CEQA Handbook provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. The SCAQMD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the Air Basin, and adverse impacts will be minimized.

#### *SCAQMD Working Group*

Since neither CARB nor the OPR has developed GHG emissions threshold, the SCAQMD formed a Working Group to develop significance thresholds related to GHG emissions. At the September 28, 2010 Working Group meeting, the SCAQMD released its most current version of the draft GHG emissions thresholds, which recommends a tiered approach that either provides a quantitative annual thresholds of 3,500 MTCO<sub>2e</sub> for residential uses, 1,400 MTCO<sub>2e</sub> for commercial uses, and 3,000 MTCO<sub>2e</sub> for mixed uses. An alternative annual threshold of 3,000 MTCO<sub>2e</sub> for all land use types is also proposed.

#### Southern California Association of Governments

The SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. With respect to air quality planning, SCAG has prepared the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), adopted April, 2016 and the *2015 Federal*

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*Transportation Improvement Program (FTIP)*, adopted October 2013, which addresses regional development and growth forecasts. Although the RTP/SCS and FTIP are primarily planning documents for future transportation projects a key component of these plans are to integrate land use planning with transportation planning that promotes higher density infill development in close proximity to existing transit service. These plans form the basis for the land use and transportation components of the AQMP, which are utilized in the preparation of air quality forecasts and in the consistency analysis included in the AQMP. The RTP/SCS, FTIP, and AQMP are based on projections originating within the City and County General Plans.

### **Local – City of Lake Elsinore**

Local jurisdictions, such as the County of Riverside, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City is also responsible for the implementation of transportation control measures as outlined in the 2007 AQMP and 2012 AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

In accordance with the CEQA requirements, the City does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region will meet federal and state standards. Instead, the City relies on the expertise of the SCAQMD and utilizes the SCAQMD CEQA Handbook as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

The City of Lake Elsinore General Plan contains the following air quality-related goals and policies that are applicable to the proposed project:

**Goal 2**                Work with regional and state governments to develop effective mitigation measures to improve air quality.

**Policy 2.1**            Support the SCAQMD in its development of improved ambient air quality monitoring capabilities and establishment of standards, thresholds, and rules to address, and where necessary mitigate, the air quality impacts of new development.

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## 4.0 ATMOSPHERIC SETTING

### ***4.1 Regional – Western Riverside County***

The project site is located within the western portion of Riverside County, which is part of the South Coast Air Basin (Air Basin) that includes the non-desert portions of Riverside, San Bernardino, and Los Angeles Counties and all of all of Orange County. Temperature inversions are the prime factor in the accumulation of contaminants in the Air Basin. The mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, and Santa Ana winds. The topography and climate of Southern California combine to create an area of high air pollution potential in the Air Basin. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cup over the cool marine layer, which prevents pollution from dispersing upward. This inversion allows pollutants to accumulate within the lower layer. Light winds during the summer further limit ventilation from occurring.

Due to the low average wind speeds in the summer and a persistent daytime temperature inversion, emissions of hydrocarbons and oxides of nitrogen have an opportunity to combine with sunlight in a complex series of reactions. These reactions produce a photochemical oxidant commonly known as smog. Since the Air Basin experiences more days of sunlight than any other major urban area in the United States, except Phoenix, the smog potential in the region is higher than in most other areas of the nation.

### ***4.2 Local – Lake Elsinore***

The major factors affecting local air pollution conditions in the Lake Elsinore planning area are the extent and types of both region-wide and local emissions, climate, and meteorology. The general climate of Lake Elsinore is characterized by sparse winter rainfall and hot summers tempered by cool ocean breezes. The climate in and around Lake Elsinore, as well as most of Southern California, is controlled largely by the strength and position of the subtropical high pressure cell over the Pacific Ocean. This high-pressure cell produces a typical Mediterranean climate with warm summers, mild winters, and moderate rainfall. This pattern is infrequently interrupted by periods of extremely hot weather brought in by Santa Ana winds. Most of the area's precipitation occurs intermittently between November and April; the area is still dominated by sunny or partly sunny conditions during these months. Cyclic land and sea breezes are the primary factors affecting the region's mild climate. The daytime winds are normally sea breezes, predominantly from the west, that flow at relatively low velocities.

Just south of Lake Elsinore, the Lake Elsinore Convergence Zone acts as an invisible boundary that obstructs much of the inland basin air pollutants from continuing south beyond the Lake Elsinore area. Coastal winds within the Lake Elsinore Convergence Zone are a primary factor for the obstruction. They allow air pollutants to be dispersed just south of the convergence zone and accumulate within the Lake Elsinore area, including surrounding communities to the north and east.

The temperature and precipitation levels for Lake Elsinore is shown below in [Table DTable-D](#) and is based on the average of data from March 10, 1897 to January 20, 2015. [Table DTable-D](#) shows that August is typically the warmest month and January is typically the coolest month. Rainfall in the project area varies considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from late November to early April, with summers being almost completely dry.

**Table D – Monthly Climate Data**

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<b>Average Max. Temperature</b>	65.4	67.5	71.0	76.3	81.8	90.5	98.1	98.1	93.5	83.7	74.1	66.9
<b>Average Min. Temperature</b>	36.4	38.7	41.2	44.7	49.8	54.1	59.4	59.8	55.8	48.8	41.1	36.5
<b>Average Total Precipitation (in.)</b>	2.47	2.54	2.03	0.75	0.23	0.02	0.08	0.12	0.26	0.51	0.99	2.01

Source: <http://www.wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca2805>

### 4.3 Monitored Local Air Quality

The air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the Air Basin. Estimates of the existing emissions in the Air Basin provided in the 2012 AQMP, indicate that collectively, mobile sources account for 59 percent of the VOC, 88 percent of the NO<sub>x</sub> emissions and 40 percent of directly emitted PM<sub>2.5</sub>, with another 10 percent of PM<sub>2.5</sub> from road dust.

SCAQMD has divided the Air Basin into 38 air-monitoring areas. The project site is located in Air Monitoring Area 25, which covers Lake Elsinore. The nearest air monitoring station to the project site is the Lake Elsinore-West Flint Street Monitoring Station (Lake Elsinore Station), which is located approximately 1.6 miles southeast of the project site at 506 West Flint Street, Lake Elsinore. However, it should be noted that due to the air monitoring station's distance from the project site, recorded air pollution levels at the Lake Elsinore Station reflect with varying degrees of accuracy, local air quality conditions at the project site. It should also be noted that CO measurements have not been provided, since CO is currently in attainment in the Air Basin and monitoring of CO within the Air Basin ended on March 31, 2013.

The monitoring data from the Lake Elsinore Station is presented in [Table ETable-E](#) and shows the most recent three years of monitoring data from CARB. [Table ETable-E](#) shows that ozone and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) are the air pollutants of primary concern in the project area, which are detailed below:

#### Ozone

The State 1-hour concentration standard for ozone has been exceeded between 4 and 18 days each year over the past three years at the Lake Elsinore Station. The State 8-hour ozone standard has been exceeded between 13 and 44 days each year over the past three years at the Lake Elsinore Station. The Federal 8-hour ozone standard has been exceeded between 13 and 35 days each year over the past three years at the Lake Elsinore Station.

Ozone is a secondary pollutant as it is not directly emitted. Ozone is the result of chemical reactions between other pollutants, most importantly hydrocarbons and NO<sub>2</sub>, which occur only in the presence of bright sunlight. Pollutants emitted from upwind cities react during transport downwind to produce the oxidant concentrations experienced in the area. Many areas of Southern California contribute to the ozone levels experienced at this monitoring station, with the more significant areas being those directly upwind.

## Nitrogen Dioxide

The Lake Elsinore Station did not record an exceedance of the Federal 1-hour NO<sub>2</sub> standard for the last three years.

**Table E – Local Area Air Quality Monitoring Summary**

Pollutant (Standard)	Year <sup>1</sup>		
	2014	2015	2016
<b>Ozone:</b>			
Maximum 1-Hour Concentration (ppm)	0.104	0.131	0.124
Days > CAAQS (0.09 ppm)	<b>4</b>	<b>18</b>	<b>15</b>
Maximum 8-Hour Concentration (ppm)	0.087	0.099	0.094
Days > NAAQS (0.070 ppm)	<b>13</b>	<b>31</b>	<b>44</b>
Days > CAAQs (0.070 ppm)	<b>13</b>	<b>35</b>	<b>45</b>
<b>Nitrogen Dioxide:</b>			
Maximum 1-Hour Concentration (ppb)	45.3	47.2	51.3
Days > NAAQS (100 ppb)	0	0	0
<b>Inhalable Particulates (PM10):</b>			
Maximum 24-Hour California Measurement (ug/m <sup>3</sup> )	86.8	90.7	65.4
Days > NAAQS (150 ug/m <sup>3</sup> )	0	0	0
Days > CAAQS (50 ug/m <sup>3</sup> )	ND	ND	ND
Annual Arithmetic Mean (AAM) (ug/m <sup>3</sup> )	26.0	20.1	20.2
Annual > NAAQS (50 ug/m <sup>3</sup> )	No	No	No
Annual > CAAQS (20 ug/m <sup>3</sup> )	<b>Yes</b>	<b>Yes</b>	<b>Yes</b>
<b>Ultra-Fine Particulates (PM2.5):</b>			
Maximum 24-Hour National Measurement (ug/m <sup>3</sup> )	33.7	42.2	26.2
Days > NAAQS (35 ug/m <sup>3</sup> )	ND	ND	ND
Annual Arithmetic Mean (AAM) (ug/m <sup>3</sup> )	11.8	ND	ND
Annual > NAAQS and CAAQS (12 ug/m <sup>3</sup> )	No	ND	ND

Notes: Exceedances are listed in **bold**. CAAQS = California Ambient Air Quality Standard; NAAQS = National Ambient Air Quality Standard; ppm = parts per million; ppb = parts per billion; ND = no data available.

<sup>1</sup> Data obtained from the Lake Elsinore Station.

Source: <http://www.arb.ca.gov/adam/>

## Particulate Matter

It is not clear whether the State 24-hour concentration standard for PM10 has been exceeded as there is no data for the last three years at the Lake Elsinore Station. Over the past three years the Federal 24-hour standard for PM10 has not been exceeded at the Lake Elsinore Station. The annual PM10 concentration at the Lake Elsinore Station has exceeded the State standard for the past three years and has not exceeded the Federal standard for the past three years.

Over the past three years there has been no data for the 24-hour concentration standard for PM2.5 at the Lake Elsinore Station. The annual PM2.5 concentration at the Lake Elsinore Station has not exceeded the

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State or Federal standard for the past three years. There does not appear to be a noticeable trend for PM10 or PM2.5 in either maximum particulate concentrations or days of exceedances in the area. Particulate levels in the area are due to natural sources, grading operations, and motor vehicles.

According to the EPA, some people are much more sensitive than others to breathing fine particles (PM10 and PM2.5). People with influenza, chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death due to breathing these fine particles. People with bronchitis can expect aggravated symptoms from breathing in fine particles. Children may experience decline in lung function due to breathing in PM10 and PM2.5. Other groups considered sensitive are smokers and people who cannot breathe well through their noses. Exercising athletes are also considered sensitive, because many breathe through their mouths during exercise.

#### ***4.4 Toxic Air Contaminant Levels in the Air Basin***

In order to determine the Air Basin-wide risks associated with major airborne carcinogens, the SCAQMD conducted the Multiple Air Toxics Exposure Study (MATES) studies. According to the SCAQMD's MATES-IV study, the project site has an estimated cancer risk of 422 per million persons chance of cancer. In comparison, the average cancer risk for the Air Basin is 991 per million persons, which is based on the use of age-sensitivity factors detailed in the OEHHA Guidelines (OEHHA, 2015).

In order to provide a perspective of risk, it is often estimated that the incidence in cancer over a lifetime for the U.S. population ranges between 1 in 3 to 4 and 1 in 3, or a risk of about 300,000 per million persons. The MATES-III study referenced a Harvard Report on Cancer Prevention, which estimated that of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures that includes hazardous air pollutants.



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## 5.0 MODELING PARAMETERS AND ASSUMPTIONS

### 5.1 CalEEMod Model Input Parameters

The criteria air pollution and GHG emissions impacts created by the proposed project have been analyzed through use of CalEEMod Version 2016.3.2. CalEEMod is a computer model published by the SCAQMD for estimating air pollutant emissions. The CalEEMod program uses the EMFAC2014 computer program to calculate the emission rates specific for South Coast Air Basin portion of Riverside County for employee, vendor and haul truck vehicle trips and the OFFROAD2011 computer program to calculate emission rates for heavy equipment operations. EMFAC2014 and OFFROAD2011 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour.

The project characteristics in the CalEEMod were set to a project location of the South Coast Air Basin portion of Riverside County, a Climate Zone of 10, and utility company of Southern California Edison, and an opening year of 2020 was utilized in this analysis.

#### Land Use Parameters

The proposed project would consist of the development of an 18-vehicle fueling position gas station with two canopies that total 6,092 square feet, an 8,360 square foot convenience store (C-store), and a 2,543 square foot fast food restaurant with a drive thru window. The proposed project would also include multiple parking lots that have a total of 78 parking spaces. A summary of the proposed project's land use parameters entered into the CalEEMod model is shown in [Table F-Table F](#).

**Table F – CalEEMod Land Use Parameters**

Proposed Land Use	Land Use Subtype in CalEEMod	Land Use Size <sup>1</sup>	Lot Acreage <sup>2</sup>	Building/Paving <sup>3</sup> (square feet)
Gas Station and C-Store	Gasoline/Service Station	18 VFP	0.60	14,452
Fast Food Drive Thru	Fast Food Restaurant with Drive Thru	2,543 TSF	0.24	2,543
Parking Lot	Parking Lot	78 PS	2.00	31,200

Notes:

<sup>1</sup> VFP = Vehicle Fueling Position, TSF = Thousand Square Foot, PS = Parking Space

<sup>2</sup> Lot acreage calculated based on a total lot acreage of 2.84 acres.

<sup>3</sup> Building/Paving square feet represent area where architectural coatings will be applied.

#### Construction Parameters

Construction activities are anticipated to start around Spring 2019 and take approximately a year to complete. The construction-related GHG emissions were based on a 30-year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009. The phases of construction activities that have been analyzed are detailed below and include: 1) site preparation, 2) grading, 3) building construction, 4) paving, and 5) application of architectural coatings.

##### Site Preparation

The site preparation phase would consist of removing any vegetation, tree stumps, and stones onsite prior to grading. The site preparation phase is anticipated to start in Spring 2019 and was modeled as occurring over one week. The site preparation activities would require 8 worker trips per day. In order to account for water truck emissions, six vendor truck emissions were added to the site preparation phase. The onsite equipment would consist of one grader, one scraper, and either one tractor, loader, or backhoe, which is based on the CalEEMod default equipment mix. The mitigation of water all exposed areas three

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times per day was chosen in order to account for the fugitive dust reduction that would occur through adhering to SCAQMD Rule 403, which requires that the Best Available Control Measures be utilized to reduce fugitive dust emissions.

### Grading

The grading phase would occur after the completion of the site preparation phase and is anticipated to take approximately two weeks to complete. The proposed grading is balanced, which would result in no dirt being imported or exported from the project site. The onsite equipment would consist of one grader, one rubber tired dozer, and two tractors, loaders, or backhoes, which is based on the CalEEMod default equipment mix. The grading activities would require 10 worker trips per day. In order to account for water truck emissions, six daily vendor truck trips were added to the grading phase. The mitigation of water all exposed areas three times per day was chosen in order to account for the fugitive dust reduction that would occur through adhering to SCAQMD Rule 403, which requires that the Best Available Control Measures be utilized to reduce fugitive dust emissions.

### Building Construction

The building construction would occur after the completion of the grading phase. The building construction phase was modeled based on occurring over approximately 10 months. The building construction would require up to 16 worker trips and 7 vendor trips per day. The onsite equipment would consist of the simultaneous operation of one crane, two forklifts, one generator set, three welders, and one tractor, loaders or backhoe, which is based on the CalEEMod default equipment mix.

### Paving

The paving would occur after the completion of the building construction phase. The paving activities was modeled as occurring over two weeks and would require up to 15 worker trips per day. The onsite equipment would consist of the simultaneous operation of one cement and mortar mixer, one paver, one paving equipment, two rollers, and one tractor, loader, or backhoe, which is based on the CalEEMod default equipment mix.

### Architectural Coating

The application of architectural coatings would occur after the completion of the paving phase. The architectural coating phase was modeled based on covering 25,493 square feet of nonresidential interior area, 8,498 feet of nonresidential exterior area, and 1,872 feet of parking area that includes striping of the parking lots and other architectural coatings in public areas. The architectural coating phase was modeled as occurring over two weeks and would require up to four worker trips per day. The onsite equipment would consist of one air compressor, which is based on the CalEEMod default equipment mix.

## **Operational Emissions Modeling**

The operations-related criteria air pollutant emissions and GHG emissions created by the proposed project have been analyzed through use of the CalEEMod model. The proposed project was analyzed in the CalEEMod model based on the land use parameters provided above.

### Mobile Sources

Mobile sources include emissions the additional vehicle miles generated from the proposed project. The vehicle trips associated with the proposed project have been analyzed through use of a trip rate of 496.12 daily trips per 1,000 square feet at the proposed fast food restaurant with a drive-thru window and a trip rate of 162.78 daily trips per vehicle fueling position at the proposed gas station and convenience store that were obtained from the *Traffic Impact Study Kassab Travel Center, City of Lake Elsinore* (Traffic



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Impact Analysis), prepared by Dudek, August 2018. This resulted in the proposed fast food restaurant generating 1,260 trips per day and the proposed gas station and convenience store generating 2,930 trips per day, for a total of 4,190 trips generated by the proposed project per day.

The analysis accounted for the Riverside Transit Agency Collier FS Riverside Stop located at approximately 100 feet northeast of the project site on the corner of Collier Avenue and Riverside Drive. The analysis also accounted for Project Design Feature 1 that requires the installation of sidewalks along the project site boundary that is adjacent to Riverside Drive as well as internal sidewalks to connect to neighborhood activity centers along Collier Avenue and Project Design Feature 2 that requires the installation of a Class II bike lane along Riverside Drive. No other changes were made to the CalEEMod default mobile source parameters.

#### Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. The area source emissions were based on the on-going use of the proposed project in the CalEEMod model. No changes were made to the default area source parameters in the CalEEMod model.

#### Energy Usage

Energy usage includes emissions from electricity and natural gas used onsite (excluding fireplaces). The energy usage was based on the ongoing use of the proposed project in the CalEEMod Model. No changes were made to the default energy usage parameters in the CalEEMod model.

The GHG analysis included implementation of Measure E-1.3 from the Climate Action Plan, which requires that all new construction exceed the 2008 Energy Efficiency Standards (Title 24 Standards) by 15 percent. It should be noted that the Title 24, Part 6 2016 Building Energy Efficiency Standards that became effective on January 1, 2017, result in an approximately 50 percent improvement to the year 2008 Title 24 building standards and the year 2016 Title 24 Part 6 standards are accounted for in the current CalEEMod model. In addition, the analysis included the CalEEMod mitigation of a 25 percent improvement in lighting efficiency in order to account for AB 1109 that requires a 25 percent reduction in energy usage for nonresidential lighting.

#### Solid Waste

Waste includes the GHG emissions associated with the processing of waste from the proposed project as well as the GHG emissions from the waste once it is interred into a landfill. The analysis was based on the default CalEEMod waste generation rates of 38.96 tons of solid waste per year from the proposed project.

The GHG analysis included implementation of Project Design Features 7 and 8. Project Design Feature 7 requires the project applicant to contract with a waste provider that provides recycling services that divert a minimum of 65 percent of solid waste generated from the proposed project. Project Design Feature 8 requires the building contractor to recycle a minimum of 65 percent of the nonhazardous construction debris generated from construction of the proposed project. Since some Statewide recycling measures are already in effect, mitigation of a 50 percent reduction in waste disposed was selected in the CalEEMod model.

#### Water and Wastewater

Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy used to transport and filter the water. The analysis was based on the default CalEEMod water usage rate of 1,010,050 gallons per year of indoor water usage and

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195,740 gallons per year of outdoor water usage from the proposed project. No changes were made to the default water and wastewater parameters in the CalEEMod model.

The GHG analysis included implementation of Measure E-4.2, requires that new developments reduce indoor water consumption by 30 percent. Implementation of 2013 Title 24 Part 11 (CalGreen) standards, which are statewide regulations are anticipated to result in a 30 percent reduction in indoor water usage through requiring the use of low-flow faucets and toilets. In order to account for the CalGreen building standards, mitigation of Install low-flow faucets and toilets were selected in the CalEEMod model.

### Vegetation

The GHG analysis included implementation of Measure E-1.1 from the Climate Action Plan, which requires that all new developments plant a minimum one 15 gallon nondeciduous umbrella form tree per 30 linear feet of boundary length. The exact implementation of Measure E-1.1 will be determined in the Landscape Plan, however since the Landscape Plan has not yet been completed, this analysis estimated the number of trees based on the project site boundary, which is approximately 1,400 linear feet and would result in the planting of 47 trees. Since the CalEEMod model provides the total metric tons anticipated to be sequestered over the trees lifetime, the CalEEMod results have been amortized over 30 years in order to obtain the anticipated annual GHG emissions reductions. In order to ensure compliance with this measure, Project Design Feature 5 has been incorporated into this analysis.

## **5.2 Gasoline Transfer and Dispensing Modeling**

The proposed project would include a 18-fueling position gas and diesel station that would have a maximum throughput of 5.88 million gallons of gasoline per year. Since the CalEEMod model does not analyze the VOC emissions created from the transfer and dispensing of gasoline at the proposed gas station, the VOC emissions have been calculated through use of the methodology provided in *Gasoline Service Station Industrywide Risk Assessment Guidelines* (CAPCOA Gas Station Guidelines), prepared by CAPCOA, November 1997 and from SCAQMD Rule 461 – Gasoline Transfer and Dispensing.

SCAQMD Rule 461 requires that the proposed underground storage tanks are equipped with a “CARB certified” enhanced vapor recovery system with “CARB- certified” pressure-vacuum valves that have a minimum volumetric efficiency of 98 percent that equates to a maximum emission factor of 0.15 pounds of VOC per 1,000 gallons of gasoline from the loading of gasoline into the storage tanks (Phase I system). In addition, Rule 461 requires that the dispensing unit for the transfer of gasoline into vehicle fuel tanks (Phase II system) is equipped with a “CARB certified” vapor recovery system that is capable of recovering 95 percent of gasoline vapors that equates to a maximum emission factor of 0.38 pounds per 1,000 gallons. The combined VOC emissions allowed from both the Phase I and Phase II systems under SCAQMD Rule 461 is 0.53 pounds of VOC per 1,000 gallons of gasoline ( $0.15 + 0.38 = 0.53$  pounds of VOC). Based on the maximum VOC emission rate of 0.53 pounds of VOC per 1,000 gallons for a gas station with 5.88 million gallons of gasoline per year, this would create 2,234 pounds of VOC per year or 6.12 pounds of VOC per day.

However, the CAPCOA Gas Station Guidelines, details that a system that would meet SCAQMD Rule 461 requirements with both Phase I and Phase II systems with vent valves would create 1.27 pounds of VOC per 1,000 gallons of gasoline (see Scenario 6B). The emission rate calculated for Scenario 6B represents a worst-case analysis that accounts for equipment failures or defects in the vapor recovery systems. Based on the maximum VOC emission rate of 01.27 pounds of VOC per 1,000 gallons for a gas station with 5.88 million gallons of gasoline per year, this would create 7,468 pounds of VOC per year or 20.46 pounds of VOC per day. This analysis has utilized the worst-case VOC emissions calculations from the CAPCOA Gas Station Guidelines.

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## 6.0 THRESHOLDS OF SIGNIFICANCE

### 6.1 Regional Air Quality

Many air quality impacts that derive from dispersed mobile sources, which are the dominate pollution generators in the Air Basin, often occurs hours later and miles away after photochemical processes have converted primary exhaust pollutants into secondary contaminants such as ozone. The incremental regional air quality impact of an individual project is generally very small and difficult to measure. Therefore, SCAQMD has developed significance thresholds based on the volume of pollution emitted rather than on actual ambient air quality because the direct air quality impact of a project is not quantifiable on a regional scale. The SCAQMD CEQA Handbook states that any project in the Air Basin with daily emissions that exceed any of the identified significance thresholds should be considered as having an individually and cumulatively significant air quality impact. For the purposes to this air quality impact analysis, a regional air quality impact would be considered significant if emissions exceed the SCAQMD significance thresholds identified in [Table G-Table G](#).

**Table G – SCAQMD Regional Criteria Pollutant Emission Thresholds of Significance**

	Pollutant Emissions (pounds/day)						
	VOC	NOx	CO	SOx	PM10	PM2.5	Lead
<b>Construction</b>	75	100	550	150	150	55	3
<b>Operation</b>	55	55	550	150	150	55	3

Source: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>

The regional criteria pollutants analysis for both construction and operation of the proposed project can be found below in Section 7.3.

### 6.2 Local Air Quality

Project-related construction air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. In order to assess local air quality impacts the SCAQMD has developed Localized Significant Thresholds (LSTs) to assess the project-related air emissions in the project vicinity. SCAQMD has also provided *Final Localized Significance Threshold Methodology* (LST Methodology), July 2008, which details the methodology to analyze local air emission impacts. The LST Methodology found that the primary emissions of concern are NO<sub>2</sub>, CO, PM10, and PM2.5.

The LST Methodology provides Look-Up Tables with different thresholds based on the location and size of the project site and distance to the nearest sensitive receptors. The project site is approximately 2.84-acres. In order to provide a conservative analysis, the 2-acre project shown in the Look Up Tables has been utilized in this analysis.

As detailed above in Section 4.3, the project site is located in Air Monitoring Area 25, which covers Lake Elsinore. For PM10 and PM2.5, which are based on a 24-hour standard, the nearest sensitive receptors are the single-family homes located as near as 1,700 feet (518 meters) to the west of the project site. In order to provide a conservative analysis, the 500 meter threshold shown in the Look Up Tables has been utilized for PM10 and PM2.5 in this analysis. For NO<sub>x</sub>, which is based on a 1-hour threshold and CO, which is based on an 8-hour threshold, the nearest sensitive receptors are the offsite workers located as near as 100 feet (30 meters) northwest of the project site. In order to provide a conservative analysis, the 25 meter threshold shown in the Look Up Tables has been utilized for NO<sub>x</sub> and CO in this analysis.

Table H shows the LSTs for NOx, CO, PM10 and PM2.5 for both construction and operational activities.

**Table H – SCAQMD Local Air Quality Thresholds of Significance**

Activity	Allowable Emissions (pounds/day) <sup>1</sup>			
	NOx	CO	PM10	PM2.5
<b>Construction</b>	234	1,100	186	91
<b>Operation</b>	234	1,100	45	22

Notes:

<sup>1</sup> For NOx and CO the thresholds are based on the nearest offsite workers (100 feet or 30 meters), which utilized the 25 meter threshold. For PM10 and PM2.5 the thresholds are based on the nearest homes (1,700 feet or 518 meters), which utilized the 500 meter threshold.

Source: Calculated from SCAQMD's Mass Rate Look-up Tables for two acres in Air Monitoring Area 25, Lake Elsinore.

### 6.3 Toxic Air Contaminants

According to the SCAQMD CEQA Handbook, any project that has the potential to expose the public to toxic air contaminants in excess of the following thresholds would be considered to have a significant air quality impact:

- If the Maximum Incremental Cancer Risk is 10 in one million or greater; or
- Toxic air contaminants from the proposed project would result in a Hazard Index increase of 1 or greater.

In order to determine if the proposed project may have a significant impact related to toxic air contaminants (TACs), the *Health Risk Assessment Guidance for analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*, (Diesel Analysis) prepared by SCAQMD, August 2003, recommends that if the proposed project is anticipated to create TACs through stationary sources or regular operations of diesel trucks on the project site, then the proximity of the nearest receptors to the source of the TAC and the toxicity of the hazardous air pollutant (HAP) should be analyzed through a comprehensive facility-wide health risk assessment (HRA).

### 6.4 Odor Impacts

The SCAQMD CEQA Handbook states that an odor impact would occur if the proposed project creates an odor nuisance pursuant to SCAQMD Rule 402, which states:

“A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.”

If the proposed project results in a violation of Rule 402 with regards to odor impacts, then the proposed project would create a significant odor impact.

### 6.5 Greenhouse Gases

The City of Lake Elsinore has adopted the *City of Lake Elsinore Climate Action Plan* (CAP), on December 13, 2011, that includes a GHG emissions reduction target based on a community-wide

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emissions reduction to 6.6 MTCO<sub>2</sub>e per service population per year by 2020 and 4.4 MTCO<sub>2</sub>e per year by 2030. These efficiency-based targets were derived by dividing the statewide AB 32 targeted emissions levels for 2020 and statewide Executive Order S-3-05 targeted emissions level for 2030. These targets represent the maximum quantity emissions each person in the State of California could emit in 2020 and 2030 based on emissions levels necessary to achieve the statewide AB 32 and Executive Order S-3-05 GHG emissions reduction goals.

It should be noted that the CAP was prepared prior to the issuance of Executive Order B-30-15 on April 29, 2015 that provided a reduction goal of 40 percent below 1990 levels by 2030. This target was codified into statute through passage of AB 197 and SB 32 in September 2016. However, to date no air district or local agency within California has provided guidance on how to address AB 197 and SB 32 with relation to land use projects. In addition, the California Supreme Court's ruling on *Cleveland National Forest Foundation v. San Diego Association of Governments* (Cleveland v. SANDAG), Filed July 13, 2017 stated:

SANDAG did not abuse its discretion in declining to adopt the 2050 goal as a measure of significance in light of the fact that the Executive Order does not specify any plan or implementation measures to achieve its goal. In its response to comments, the EIR said: "It is uncertain what role regional land use and transportation strategies can or should play in achieving the EO's 2050 emissions reduction target. A recent California Energy Commission report concludes, however, that the primary strategies to achieve this target should be major 'decarbonization' of electricity supplies and fuels, and major improvements in energy efficiency [citation]."

Although, the above court case was referencing California's GHG emission targets for the year 2050, at this time it is also unclear what role land use strategies can or should play in achieving the AB 197 and SB 32 reduction goal of 40 percent below 1990 levels by 2030. As such this analysis has relied on the project level analysis methodology provided in the CAP, It should be noted that the CAP was prepared prior to the issuance of Executive Order B-30-15 on April 29, 2015 that provided a reduction goal of 40 percent below 1990 levels by 2030. This target was codified into statute through passage of AB 197 and SB 32 in September 2016. The *Staff Report Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets*, prepared by CARB June 2017, provides recommendations the MPOs located within the State to meet the new SB 32 targets. For SCAG, which is the MPO that represents Southern California, including the project site, this Report recommends that SCAG increase its year 2035 efficiency target from an 18 percent reduction to a 21 percent reduction in order to account for AB 197 and SB 32. This equates to a 16.7 percent increase in SCAG reduction target for the year 2035. In order to provide a conservative analysis, the year 2030 efficiency target of 4.4 MTCO<sub>2</sub>e was reduced by 16.7 percent to account for AB 197 and SB 32, which results in a modified efficiency target of 3.7 MTCO<sub>2</sub>e for the year 2030, which states: Specifically, the CAP is designed to:

Serve as the programmatic tiering document for the purposes of CEQA within the City of Lake Elsinore for GHG emissions, by which applicable projects will be reviewed. If a proposed development project can demonstrate it is consistent with the applicable emissions reduction measures included in the CAP, the programs and standards that would be implemented as a result of the CAP, and the General Plan Update growth projections, the project's environmental review pertaining to GHG impacts may be streamlined as allowed by CEQA Guidelines Sections 15152 and 15183.5.

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Therefore, the proposed project would be considered to be consistent with the CAP~~create a significant cumulative GHG emissions impact~~ if the proposed project can demonstrate it is consistent with the applicable emissions reduction measures included in the CAP, the programs and standards that would be implemented as a result of the CAP, and the General Plan Update growth projections.

~~'s GHG emissions exceeds the service population efficiency targets of 6.6 MTCO<sub>2</sub>e per year for year 2020 and 3.7 MTCO<sub>2</sub>e per year for year 2030.~~



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## 7.0 IMPACT ANALYSIS

### 7.1 CEQA Thresholds of Significance

Consistent with CEQA and the State CEQA Guidelines, a significant impact related to air quality and global climate change would occur if the proposed project is determined to result in:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Expose sensitive receptors to substantial pollutant concentrations;
- Create objectionable odors affecting a substantial number of people.
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

### 7.2 Air Quality Compliance

The proposed project would not conflict with or obstruct implementation of the SCAQMD Air Quality Management Plan (AQMP). The following section discusses the proposed project's consistency with the SCAQMD AQMP.

#### SCAQMD Air Quality Management Plan

The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and regional plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed project includes the SCAQMD AQMP. Therefore, this section discusses any potential inconsistencies of the proposed project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

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- (2) Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criterion 1 - Increase in the Frequency or Severity of Violations?

Based on the air quality modeling analysis contained in this report, short-term regional construction air emissions would not result in significant impacts based on SCAQMD regional thresholds of significance discussed above in Section 6.1 or local thresholds of significance discussed above in Section 6.2. The ongoing operation of the proposed project would generate air pollutant emissions that are inconsequential on a regional basis and would not result in significant impacts based on SCAQMD thresholds of significance discussed above in Section 6.1. The analysis for long-term local air quality impacts showed that local pollutant concentrations would not be projected to exceed the air quality standards. Therefore, a less than significant long-term impact would occur and no mitigation would be required.

Therefore, based on the information provided above, the proposed project would be consistent with the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to insure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The AQMP is developed through use of the planning forecasts provided in the RTP/SCS and FTIP. The RTP/SCS is a major planning document for the regional transportation and land use network within Southern California. The RTP/SCS is a long-range plan that is required by federal and state requirements placed on SCAG and is updated every four years. The FTIP provides long-range planning for future transportation improvement projects that are constructed with state and/or federal funds within Southern California. Local governments are required to use these plans as the basis of their plans for the purpose of consistency with applicable regional plans under CEQA. For this project, the City of Lake Elsinore Business District, adopted December 13, 2011, defines the assumptions that are represented in AQMP.

The project site is designated as Limited Industrial in the Business District Plan and is zoned Commercial Manufacturing (CM). The proposed project is consistent with the current land use designation and would not require a General Plan Amendment or zone change. As such, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project will not result in an inconsistency with the SCAQMD AQMP. Therefore, a less than significant impact will occur in relation to implementation of the AQMP.

**Level of Significance**

Less than significant impact.

***7.3 Air Quality Standard Violation***

The proposed project would not violate an air quality standard or contribute substantially to an existing or projected air quality violation. The following section calculates the potential air emissions associated with the construction and operations of the proposed project and compares the emissions to the SCAQMD standards.

## Construction Emissions

The proposed project would consist of the development of an 18-vehicle fueling position gas station with two canopies that total 5,264 square feet, an 8,360 square foot convenience store (C-store), and a 2,543 square foot fast food restaurant with a drive thru window. The proposed project would also include a 65-space parking lot. The construction emissions have been analyzed for both regional and local air quality impacts.

### Construction-Related Regional Impacts

The CalEEMod model has been utilized to calculate the construction-related regional emissions from the proposed project and the input parameters utilized in this analysis have been detailed in Section 5.1. The worst-case summer or winter daily construction-related criteria pollutant emissions from the proposed project for each phase of construction activities are shown below in [Table I](#) and the CalEEMod daily printouts are shown in Appendix A. Since it is possible that building construction, paving, and architectural coating activities may occur concurrently, [Table I](#) also shows the combined criteria pollutant emissions from building construction, paving and architectural coating phases of construction.

**Table I – Construction-Related Regional Criteria Pollutant Emissions**

Activity	Pollutant Emissions (pounds/day)					
	VOC	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Site Preparation<sup>1</sup></b>						
Onsite	1.76	21.54	11.91	0.02	1.47	0.85
Offsite	0.06	0.71	0.48	0.00	0.13	0.04
<b>Total</b>	<b>1.82</b>	<b>22.25</b>	<b>12.39</b>	<b>0.02</b>	<b>1.60</b>	<b>0.89</b>
<b>Grading<sup>1</sup></b>						
Onsite	2.03	22.74	10.15	0.02	3.63	2.30
Offsite	0.08	0.72	0.57	0.00	0.16	0.05
<b>Total</b>	<b>2.11</b>	<b>23.46</b>	<b>10.72</b>	<b>0.02</b>	<b>3.79</b>	<b>2.35</b>
<b>Building Construction</b>						
Onsite	2.56	18.91	15.25	0.03	1.09	1.04
Offsite	0.13	0.98	1.01	0.00	0.27	0.08
<b>Total</b>	<b>2.69</b>	<b>19.89</b>	<b>16.26</b>	<b>0.03</b>	<b>1.36</b>	<b>1.12</b>
<b>Paving</b>						
Onsite	1.68	11.59	11.81	0.02	0.66	0.61
Offsite	0.08	0.05	0.60	0.00	0.17	0.05
<b>Total</b>	<b>1.76</b>	<b>11.64</b>	<b>12.41</b>	<b>0.02</b>	<b>0.83</b>	<b>0.66</b>
<b>Architectural Coatings</b>						
Onsite	16.86	1.68	1.83	0.00	0.11	0.11
Offsite	0.02	0.01	0.16	0.00	0.05	0.01
<b>Total</b>	<b>16.88</b>	<b>1.69</b>	<b>1.99</b>	<b>0.00</b>	<b>0.16</b>	<b>0.12</b>
<b>Combined Building Construction, Paving, and Architectural Coatings</b>	<b>21.33</b>	<b>33.22</b>	<b>30.66</b>	<b>0.05</b>	<b>2.35</b>	<b>1.90</b>
<b>SCQAMD Thresholds</b>	<b>75</b>	<b>100</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
Exceeds Threshold?	No	No	No	No	No	No

Notes:

<sup>1</sup> Site Preparation and Grading based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

<sup>2</sup> Onsite emissions from equipment not operated on public roads.

<sup>3</sup> Offsite emissions from vehicles operating on public roads.

Source: CalEEMod Version 2016.3.2.

[Table I](#) shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds during site preparation, grading, or the combined building construction, paving, and architectural coatings phases. Therefore, a less than significant regional air quality impact would occur from construction of the proposed project.

### Construction-Related Local Impacts

Construction-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

The local air quality emissions from construction were analyzed through utilizing the methodology described in *Localized Significance Threshold Methodology* (LST Methodology), prepared by SCAQMD, revised October 2009. The LST Methodology found the primary criteria pollutant emissions of concern are NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub>. In order to determine if any of these pollutants require a detailed analysis of the local air quality impacts, each phase of construction was screened using the SCAQMD's Mass Rate LST Look-up Tables. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily onsite emissions of CO, NO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> from the proposed project could result in a significant impact to the local air quality. [Table J](#) shows the onsite emissions from the CalEEMod model for the different construction phases and the calculated emissions thresholds that have been detailed above in Section 6.2. Since it is possible that building construction, paving, and architectural coating activities may occur concurrently, [Table J](#) also shows the combined local criteria pollutant emissions from building construction, paving and architectural coating phases of construction.

**Table J – Construction-Related Local Criteria Pollutant Emissions**

Phase	Pollutant Emissions (pounds/day)			
	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
Site Preparation <sup>1</sup>	21.54	11.91	1.47	0.85
Grading <sup>1</sup>	22.74	10.15	3.63	2.30
Combined Building Construction, Paving, and Architectural Coatings	32.18	28.89	1.86	1.76
- <i>Building Construction</i>	<i>18.91</i>	<i>15.25</i>	<i>1.09</i>	<i>1.04</i>
- <i>Paving</i>	<i>11.59</i>	<i>11.81</i>	<i>0.66</i>	<i>0.61</i>
- <i>Architectural Coatings</i>	<i>1.68</i>	<i>1.83</i>	<i>0.11</i>	<i>0.11</i>
SCAQMD Localized Thresholds <sup>2</sup>	<b>234</b>	<b>1,100</b>	<b>186</b>	<b>91</b>
Exceeds Threshold?	No	No	No	No

Notes:

<sup>1</sup> Site Preparation and Grading based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

<sup>2</sup> For NO<sub>x</sub> and CO the thresholds are based on the nearest offsite workers (100 feet or 30 meters), which utilized the 25 meter threshold. For PM<sub>10</sub> and PM<sub>2.5</sub> the thresholds are based on the nearest homes (1,700 feet or 518 meters), which utilized the 500 meter threshold.

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres in Air Monitoring Area 25, Lake Elsinore.

The data provided in [Table J](#) shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds during the site preparation or grading phase or the combined building construction, paving, and architectural coatings phases. Therefore, a less than significant local air quality impact would occur from construction of the proposed project.

### **Operational Emissions**

The on-going operation of the proposed project would result in a long-term increase in air quality emissions. This increase would be due to emissions from the project-generated vehicle trips and through

operational emissions from the on-going use of the proposed project. The following section provides an analysis of potential long-term air quality impacts due to regional air quality and local air quality impacts from the on-going operations of the proposed project.

#### Operations-Related Regional Air Quality Impacts

The operations-related regional air quality impacts created by the proposed project have been analyzed through use of the CalEEMod model and the input parameters utilized in this analysis have been detailed in Section 5.2. The VOC emissions created from the proposed gas station's storage and dispensing of gasoline have been analyzed through use of the CAPCOA Gas Station Guidelines, that have been detailed above in Section 5.2. The worst-case summer or winter VOC, NOx, CO, SO<sub>2</sub>, PM10, and PM2.5 daily emissions created from the proposed project's long-term operations have been calculated and are summarized below in Table K and the CalEEMod daily emissions printouts are shown in Appendix A.

**Table K – Operational Regional Criteria Pollutant Emissions**

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO <sub>2</sub>	PM10	PM2.5
Area Sources <sup>1</sup>	0.39	0.00	0.01	0.00	0.00	0.00
Energy Usage <sup>2</sup>	0.03	0.31	0.26	0.00	0.02	0.02
Mobile Sources <sup>3</sup>	7.93	48.57	45.88	0.16	8.44	2.35
<u>Gasoline Storage and Dispensing<sup>4</sup></u>	<u>20.46</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>
	<b>8.3528.8</b>	<b>48.88</b>	<b>46.15</b>	<b>0.16</b>	<b>8.46</b>	<b>2.37</b>
<b>Total Emissions</b>	<b>1</b>					
<b>SCQAMD Operational Thresholds</b>	<b>55</b>	<b>55</b>	<b>550</b>	<b>150</b>	<b>150</b>	<b>55</b>
Exceeds Threshold?	No	No	No	No	No	No

Notes:

<sup>1</sup> Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.

<sup>2</sup> Energy usage consist of emissions from natural gas usage (excluding hearths).

<sup>3</sup> Mobile sources consist of emissions from vehicles and road dust.

<sup>4</sup> Gasoline storage and dispensing VOC emissions rate based on 1.27 pounds of VOC per 1,000 gallons of gasoline throughput, based on a maximum throughput of 5.88 million gallons of gasoline per year.

Source: Calculated from CalEEMod Version 2016.3.2 and CAPCOA, 1997.

The data provided in Table K above shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the proposed project.

#### Operations-Related Local Air Quality Impacts

Project-related air emissions may have the potential to exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. The proposed project has been analyzed for the potential local CO emission impacts from the project-generated vehicular trips and from the potential local air quality impacts from on-site operations. The following analysis analyzes the vehicular CO emissions and local impacts from on-site operations.

##### *Local CO Hotspot Impacts from Project-Generated Vehicular Trips*

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards of 20 ppm over one hour or 9 ppm over eight hours.

At the time of the 1993 Handbook, the Air Basin was designated nonattainment under the CAAQS and NAAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined. In 2007, the Air Basin was designated in attainment for CO under both the CAAQS and NAAQS. SCAQMD conducted a CO hot spot analysis for attainment at the busiest intersections in Los Angeles during the peak morning and afternoon periods and did not predict a violation of CO standards<sup>1</sup>. Since the nearby intersections to the proposed project are much smaller with less traffic than what was analyzed by the SCAQMD, no local CO Hotspot are anticipated to be created from the proposed project and no CO Hotspot modeling was performed. Therefore, a less than significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

#### *Local Criteria Pollutant Impacts from Onsite Operations*

Project-related air emissions from onsite sources such as architectural coatings, landscaping equipment, and onsite usage of natural gas appliances may have the potential to create emissions areas that exceed the State and Federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

The local air quality emissions from on-site operations were analyzed using the SCAQMD's Mass Rate LST Look-up Tables and the methodology described in LST Methodology. The Look-up Tables were developed by the SCAQMD in order to readily determine if the daily emissions of CO, NOx, PM10, and PM2.5 from the proposed project could result in a significant impact to the local air quality. [Table L-Table-L](#) shows the onsite emissions from the CalEEMod model that includes area sources, energy usage, vehicles, and off-road equipment operating onsite and the calculated emissions thresholds.

**Table L – Operations-Related Local Criteria Pollutant Emissions**

On-Site Emission Source	Pollutant Emissions (pounds/day)			
	NOx	CO	PM10	PM2.5
Area Sources	0.00	0.00	0.00	0.00
Energy Usage	0.31	0.26	0.02	0.02
Onsite Vehicle Emissions <sup>1</sup>	6.07	5.74	1.06	0.29
<b>Total Emissions</b>	<b>6.38</b>	<b>6.01</b>	<b>1.08</b>	<b>0.31</b>
<b>SCAQMD Localized Thresholds<sup>2</sup></b>	<b>234</b>	<b>1,100</b>	<b>45</b>	<b>22</b>
Exceeds Threshold?	No	No	No	No

Notes:

<sup>1</sup> Onsite vehicle emissions based on 1/8 of the gross vehicular emissions, which is the estimated portion of vehicle emissions occurring within a quarter mile of the project site.

<sup>2</sup> For NOx and CO the thresholds are based on the nearest offsite workers (100 feet or 30 meters), which utilized the 25 meter threshold. For PM10 and PM2.5 the thresholds are based on the nearest homes (1,700 feet or 518 meters), which utilized the 500 meter threshold.

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for two acres in Air Monitoring Area 25, Lake Elsinore.

The data provided in [Table L-Table-L](#) shows that the on-going operations of the proposed project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed above in Section 6.2. Therefore, the on-going operations of the proposed project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

<sup>1</sup> The four intersections analyzed by the SCAQMD were: Long Beach Boulevard and Imperial Highway; Wilshire Boulevard and Veteran Avenue; Sunset Boulevard and Highland Avenue; and La Cienega Boulevard and Century Boulevard. The busiest intersection evaluated (Wilshire and Veteran) had a daily traffic volume of approximately 100,000 vehicles per day with LOS E in the morning and LOS F in the evening peak hour.



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## **Level of Significance**

Less than significant impact.

### ***7.4 Cumulative Net Increase in Non-Attainment Pollution***

The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).

Cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel throughout the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. Accordingly, the cumulative analysis for the project's air quality must be generic by nature. The project area is out of attainment for ozone and PM10 and PM2.5 particulate matter. In accordance with CEQA Guidelines Section 15130(b), this analysis of cumulative impacts incorporates a three-tiered approach to assess cumulative air quality impacts.

- Consistency with the SCAQMD project specific thresholds for construction and operations;
- Project consistency with existing air quality plans; and
- Assessment of the cumulative health effects of the pollutants.

## **Consistency with Project Specific Thresholds**

### **Construction-Related Impacts**

The project site is located in the South Coast Air Basin, which is currently designated by the EPA for federal standards as a non-attainment area for ozone and PM2.5 and by CARB for the state standards as a non-attainment area for ozone, PM10, and PM2.5. The regional ozone, PM10, and PM2.5 emissions associated with construction of the proposed project have been calculated above in Section 7.3. The above analysis found that development of the proposed project would result in less than significant regional emissions of VOC and NOx (ozone precursors), PM10, and PM2.5 during construction of the proposed project. Therefore, a less than significant cumulative impact would occur from construction of the proposed project.

### **Operational-Related Impacts**

The greatest cumulative operational impact on the air quality to the Air Basin will be the incremental addition of pollutants mainly from increased traffic from residential, commercial, and industrial development. In accordance with SCAQMD methodology, projects that do not exceed SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact. The regional ozone, PM10, and PM2.5 emissions created from the on-going operations of the proposed project have been calculated above in Section 7.3. The above analysis found that development of the proposed project would result in less than significant regional emissions of VOC and NOx (ozone precursors), PM10, and PM2.5 during operation of the proposed project. With respect to long-term emissions, this project would create a less than significant cumulative impact.

## **Consistency with Air Quality Plans**

As detailed above in Section 7.2, the project site is currently designated as Limited Industrial in the Business District Plan and is zoned Commercial Manufacturing (CM). The proposed project is consistent with the current land use designation and would not require a General Plan Amendment or zone change. Therefore, the proposed project would not result in an inconsistency with the current land use designation.

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As such, the proposed project is not anticipated to exceed the AQMP assumptions for the project site and is found to be consistent with the AQMPs for the Air Basin.

### **Cumulative Health Impacts**

The Air Basin is designated as nonattainment for ozone, PM10, 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 (elderly, children, and the sick). Therefore, when the concentrations of those pollutants exceeds the standard, it is likely that some sensitive individuals in the population would experience health effects. The regional analysis detailed above in Section 7.3 found that the proposed project would not exceed the SCAQMD regional significance thresholds for VOC and NOx (ozone precursors), PM10 and PM2.5. As such, the proposed project would result in a less than significant cumulative health impact.

### **Level of Significance**

Less than significant impact.

## ***7.5 Sensitive Receptors***

The proposed project would not expose sensitive receptors to substantial pollutant concentrations. The local concentrations of criteria pollutant emissions produced in the nearby vicinity of the proposed project, which may expose sensitive receptors to substantial concentrations have been calculated above in Section 7.3 for both construction and operations, which are discussed separately below. The discussion below also includes an analysis of the potential impacts from toxic air contaminant emissions. The nearest sensitive receptors are the offsite workers at the commercial uses located as near as 100 feet northwest of the project site. There are also single-family homes located as near as 1,700 feet southwest of the project site

### **Construction-Related Sensitive Receptor Impacts**

Construction of the proposed project may expose sensitive receptors to substantial pollutant concentrations of localized criteria pollutant concentrations and from toxic air contaminant emissions created from onsite construction equipment, which are described below.

#### Local Criteria Pollutant Impacts from Construction

The local air quality impacts from construction of the proposed project has been analyzed above in Section 7.3 and found that the construction of the proposed project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed above in Section 6.2. Therefore, construction of the proposed project would create a less than significant construction-related impact to local air quality and no mitigation would be required.

#### Toxic Air Contaminants Impacts from Construction

The greatest potential for toxic air contaminant emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during construction of the proposed project. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of “individual cancer risk”. “Individual Cancer Risk” is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the relatively limited number of heavy-duty construction equipment and the short-term construction schedule, the proposed project would not result in a long-term (i.e., 70 years) substantial source of toxic air contaminant emissions and corresponding individual cancer risk. In addition, California Code of Regulations Title 13, Article 4.8, Chapter 9,

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Section 2449 regulates emissions from off-road diesel equipment in California. This regulation limits idling of equipment to no more than five minutes, requires equipment operators to label each piece of equipment and provide annual reports to CARB of their fleet's usage and emissions. This regulation also requires systematic upgrading of the emission Tier level of each fleet, and currently no commercial operator is allowed to purchase Tier 0 or Tier 1 equipment and by January 2023 no commercial operator is allowed to purchase Tier 2 equipment. In addition to the purchase restrictions, equipment operators need to meet fleet average emissions targets that become more stringent each year between years 2014 and 2023. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project. As such, construction of the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

### **Operations-Related Sensitive Receptor Impacts**

The on-going operations of the proposed project may expose sensitive receptors to substantial pollutant concentrations of local CO emission impacts from the project-generated vehicular trips and from the potential local air quality impacts from onsite operations. The following analyzes the vehicular CO emissions. Local criteria pollutant impacts from onsite operations, and toxic air contaminant impacts.

#### Local CO Hotspot Impacts from Project-Generated Vehicle Trips

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential impacts to sensitive receptors. The analysis provided above in Section 7.3 shows that no local CO Hotspots are anticipated to be created at any nearby intersections from the vehicle traffic generated by the proposed project. Therefore, operation of the proposed project would result in a less than significant exposure of offsite sensitive receptors to substantial pollutant concentrations.

#### Local Criteria Pollutant Impacts from Onsite Operations

The local air quality impacts from the operation of the proposed project would occur from onsite sources such as architectural coatings, landscaping equipment, and onsite usage of natural gas appliances. The analysis provided above in Section 7.3 found that the operation of the proposed project would not exceed the local NOx, CO, PM10 and PM2.5 thresholds of significance discussed above in Section 6.2. Therefore, the on-going operations of the proposed project would create a less than significant operations-related impact to local air quality due to on-site emissions and no mitigation would be required.

#### Operations-Related Toxic Air Contaminant Impacts

The proposed project would include an 18-fueling position gas and diesel station that would have a maximum has been estimated to have a throughput of 5.882 million gallons of gasoline per year. The *Emission Inventory and Risk Assessment Guidelines for Gasoline Dispensing Stations* (Gas Station Risk Assessment), prepared by SCAQMD, January 2007, analyzed the TAC emissions and associated cancer risks from gasoline dispensing facilities at locations throughout the Air Basin. It should be noted that the proposed project would also sell diesel fuel, however the Gas Station Risk Assessment did not find diesel fueling activities as a source of substantial TAC emissions and therefore this analysis has been limited to the analysis of TAC emissions created from gasoline dispensing stations.

The Gas Station Risk Assessment provides residential cancer risk Look Up Tables that are based on the wind patterns from representative monitoring stations throughout Southern California. The Norco Monitoring Station data from the Look Up Tables was utilized as that is the nearest location to the project site. Based on a worst-case analysis of the nearest homes being located as near as 500 meters (1,640 feet) downwind from the gas fuel dispensers, the Look Up Tables show that a one million gallon per year gas

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throughput gas station would create a residential cancer risk of 0.02 per million persons. Based on the formula provided in the Gas Station Risk Assessment, the proposed project with a throughput of 5.882 million gallons per year would create a **cancer risk of 0.1204 per million persons**. The project-related cancer risk of 0.1204 per million persons would be within the SCAQMD's threshold of 10 per million detailed above in Section 6.3. As such, the TAC emissions and associated cancer risks from the proposed gas station would result in a less than significant impact to the nearby residents.

Therefore, operation of the proposed project would result in a less than significant exposure of sensitive receptors to substantial pollutant concentrations.

### **Level of Significance**

Less than significant impact.

## **7.6 Objectionable Odors**

The proposed project would not create objectionable odors affecting a substantial number of people. Potential odor impacts have been analyzed separately for construction and operations below.

Individual responses to odors are highly variable and can result in a variety of effects. Generally, the impact of an odor results from a variety of factors such as frequency, duration, offensiveness, location, and sensory perception. The frequency is a measure of how often an individual is exposed to an odor in the ambient environment. The intensity refers to an individual's or group's perception of the odor strength or concentration. The duration of an odor refers to the elapsed time over which an odor is experienced. The offensiveness of the odor is the subjective rating of the pleasantness or unpleasantness of an odor. The location accounts for the type of area in which a potentially affected person lives, works, or visits; the type of activity in which he or she is engaged; and the sensitivity of the impacted receptor.

Sensory perception has four major components: detectability, intensity, character, and hedonic tone. The detection (or threshold) of an odor is based on a panel of responses to the odor. There are two types of thresholds: the odor detection threshold and the recognition threshold. The detection threshold is the lowest concentration of an odor that will elicit a response in a percentage of the people that live and work in the immediate vicinity of the project site and is typically presented as the mean (or 50 percent of the population). The recognition threshold is the minimum concentration that is recognized as having a characteristic odor quality, this is typically represented by recognition by 50 percent of the population. The intensity refers to the perceived strength of the odor. The odor character is what the substance smells like. The hedonic tone is a judgment of the pleasantness or unpleasantness of the odor. The hedonic tone varies in subjective experience, frequency, odor character, odor intensity, and duration.

### **Construction-Related Odor Impacts**

Potential sources that may emit odors during construction activities include the application of coatings such as asphalt pavement, paints and solvents and from emissions from diesel equipment. The objectionable odors that may be produced during the construction process would be temporary and would not likely be noticeable for extended periods of time beyond the project site's boundaries. Due to the transitory nature of construction odors, a less than significant odor impact would occur and no mitigation would be required.

### **Potential Operations-Related Odor Impacts**

The proposed project would consist of the development of an 18-pump gas station and associated convenience store, a fast-food restaurant with a drive-thru window, and a parking lot. Potential sources that may emit odors during the on-going operations of the proposed project would primarily occur from

odor emissions from gas dispensing activities and from the trash storage areas. Pursuant to SCAQMD Rule 461 the proposed gas station will be required to utilize gas dispensing equipment that minimizes vapor and liquid leaks and requires that the equipment be maintained at proper working order, which will minimize odor impacts occurring from the gasoline and diesel dispensing facilities. Pursuant to City regulations, permanent trash enclosures that protect trash bins from rain as well as limit air circulation would be required for the trash storage areas. Due to the distance of the nearest receptors from the project site and through compliance with SCAQMD's Rule 461 and City trash storage regulations, no significant impact related to odors would occur during the on-going operations of the proposed project. Therefore, a less than significant odor impact would occur and no mitigation would be required.

### Level of Significance

Less than significant impact.

## 7.7 Generation of Greenhouse Gas Emissions

The proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. The proposed project would consist of the development of an 18-pump gas station and associated convenience store, a fast-food restaurant with a drive-thru window, and a parking lot. The City of Lake Elsinore has adopted the *City of Lake Elsinore Climate Action Plan* (~~CAP~~Climate Action Plan), on December 13, 2011, which states: Specifically, the CAP is designed to:

Serve as the programmatic tiering document for the purposes of CEQA within the City of Lake Elsinore for GHG emissions, by which applicable projects will be reviewed. If a proposed development project can demonstrate it is consistent with the applicable emissions reduction measures included in the CAP, the programs and standards that would be implemented as a result of the CAP, and the General Plan Update growth projections, the project's environmental review pertaining to GHG impacts may be streamlined as allowed by CEQA Guidelines Sections 15152 and 15183.5.

~~provides service population efficiency targets of 6.6 MTCO<sub>2</sub>e per year for year 2020 and 4.4 MTCO<sub>2</sub>e per year for 2030.~~

In order to show consistency with the CAP, quantification of the proposed project's GHG emissions are not required. However, the proposed project's GHG emissions have been provided for informational purposes only. ~~determine if the proposed project meets the efficiency targets set forth in the Climate Action Plan.~~ The GHG emissions from the proposed project were analyzed for year 2020 conditions. A summary of the results is shown below in ~~Table M~~Table M and the CalEEMod model run for year 2020 is provided in Appendix B.

**Table M – Proposed Project Greenhouse Gas Annual Emissions**

Category	Greenhouse Gas Emissions (Metric Tons per Year)			
	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
Area Sources <sup>1</sup>	0.00	0.00	0.00	0.00
Energy Usage <sup>2</sup>	132.50	0.00	0.00	133.11
Mobile Sources <sup>3</sup>	2,057.31	0.23	0.00	2,062.96
Solid Waste <sup>4</sup>	3.95	0.23	0.00	9.80
Water and Wastewater <sup>5</sup>	4.46	0.03	0.00	5.36
Construction <sup>6</sup>	8.93	0.00	0.00	8.97
Vegetation <sup>7</sup>				-1.11
<b>Total GHG Emissions</b>	<b>2,207.15</b>	<b>0.49</b>	<b>0.00</b>	<b>2,219.09</b>

<b>SCAQMD Draft Threshold of Significance for All Land Uses</b>	<b>3,000</b>
<b>Service Population<sup>8</sup></b>	<b>2,095</b>
<b>Year 2020 Emissions per Service Population</b>	<b>1.1</b>
<b>City of Lake Elsinore CAP Year 2020 Efficiency Target</b>	<b>6.6</b>
<b>City of Lake Elsinore CAP Modified Year 2030 Efficiency Target<sup>9</sup></b>	<b>3.7</b>

Notes:

<sup>1</sup> Area sources consist of GHG emissions from consumer products, architectural coatings, and landscaping equipment.

<sup>2</sup> Energy usage consists of GHG emissions from electricity and natural gas usage.

<sup>3</sup> Mobile sources consist of GHG emissions from vehicles.

<sup>4</sup> Waste includes the CO<sub>2</sub> and CH<sub>4</sub> emissions created from the solid waste placed in landfills.

<sup>5</sup> Water includes GHG emissions from electricity used for transport of water and processing of wastewater.

<sup>6</sup> Construction emissions amortized over 30 years as recommended in the SCAQMD GHG Working Group on November 19, 2009.

<sup>7</sup> Vegetation sequestration amortized over 30 years.

<sup>8</sup> Service population based on the total daily trips to the project site (Dudek, 2018) and then divided by two, since each customer and employee would make one trip to the project site and one trip leaving the project site.

<sup>9</sup> The CAP's Year 2030 Efficiency Target of 4.4 MTCO<sub>2</sub>e per year was reduced by 16.7 percent to account for AB 197 and SB 32.

Source: CalEEMod Version 2016.3.2.

Table M above shows that for the year 2020, the proposed project would create 21,219.09 MTCO<sub>2</sub>e per year, which is within the SCAQMD's draft threshold of significance for all land use types of 3,000 MTCO<sub>2</sub>e per year. Table M also shows that the project GHG emissions would result in an efficiency rate of 1.1 MTCO<sub>2</sub>e per year per service population. The GHG emissions from the proposed project would be within the CAP's Year 2020 Efficiency Target of 6.6 MTCO<sub>2</sub>e per year and within the modified CAP's 2030 Efficiency Target of 3.74 MTCO<sub>2</sub>e per year that has been modified to account for the more stringent GHG emissions reductions required by AB 197 and SB 32. It should be noted that the Year 2020 emissions are based on approved statewide GHG reduction measures and the required GHG reduction measures provided in the City's Climate Action Plan which are detailed below in Section 7.8 and include Project Design Features 1 through 8. Therefore, impacts would be less than significant.

## Level of Significance

Less than significant impact.

## 7.8 Greenhouse Gas Plan Consistency

The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. The City of Lake Elsinore has adopted the *City of Lake Elsinore Climate Action Plan (CAP Climate Action Plan)*, on December 13, 2011. The CAP Climate Action Plan provides the following specific measures to be implemented in new developments to reduce GHG emissions as well as a GHG emissions reduction target based on a community-wide emissions reduction to 6.6 MTCO<sub>2</sub>e per service population per year by 2020. Table N provides a list of the applicable reduction measures for new non-residential developments included in the Climate Action Plan. Table N also provides a project consistency analysis of each measure.

**Table N – GHG Reduction Measures for New Developments and Project Consistency**

Local Measure	Measure Description	Project Consistency
T-1.2: Pedestrian Infrastructure	Through the development review process, require the installation of sidewalks along new and reconstructed streets. Also require new subdivisions and large developments to provide sidewalks or paths to internally link all uses where applicable and provide connections to neighborhood activity centers, major destinations,	<b>Consistent.</b> Project Design Feature 1 is provided that requires the installation of sidewalks along the project site boundary that is adjacent to Riverside drive and Collier Avenue as well as internal sidewalks to connect to neighborhood activity centers, major destinations, and transit facilities.



**Table N – GHG Reduction Measures for New Developments and Project Consistency**

Local Measure	Measure Description	Project Consistency
	and transit facilities contiguous with the project site; implement through conditions of approval.	
T-1.4: Bicycle Infrastructure	Through the development review process, require new development, as applicable, to implement and connect to the network of Class I, II and III bikeways, trails and safety features identified in the General Plan, Bike Lane Master Plan, Trials Master Plan and Western Riverside County Non-Motorized Transportation plan, implement through conditions of approval. The City will also continue to pursue and utilize funding when needed to implement portions of these plans.	<b>Consistent.</b> Project Design Feature 2 is provided which requires the installation of a bike lane along the project site boundary with Riverside Drive and Collier Avenue. See the Lake Elsinore General Plan Circulation Element, Figure 2.5 Bikeway Plan.
T-1.5: Bicycle Parking Standards	Through the development review process, enforce the following short-term and long-term bicycle parking standards for new non-residential development (consistent with 2010 California Green Building Code [CalGreen], Section 5.106.4), and implement through conditions of approval: <ul style="list-style-type: none"> <li>• <i>Short-Term Bicycle Parking:</i> If the project is anticipated to generate visitor traffic, provide permanently anchored bicycle racks within 200 feet of the visitor entrance, readily visible to passers-by, for 5% of visitor motorized vehicle parking capacity, with a minimum of one two-bike capacity rack.</li> <li>• <i>Long-Term Bicycle Parking:</i> For buildings with over 10 tenant-occupants, provide secure bicycle parking for 5% of tenant-occupied motorized vehicle parking capacity, with a minimum of one space.</li> </ul>	<b>Consistent.</b> Project Design Feature 3 is provided which requires the installation of bicycle parking spaces to equal five percent of the visitor parking capacity. The Site Plan for the project details the locations of the two bike racks, with one located east of the Convenience Store entrance and the other located south of the Drive-Thru restaurant entrance.
T-3.1: Mixed Use, High Density, Infill and Transit Oriented Development	Revise the Land Use Map and Municipal Code to allow for and/or increase the amount of mixed use, high density, infill and transit oriented development. Mixed-use projects should be targeted in the Historic and Ballpark Districts, as well as other areas where services are within walking distance. High density projects should be located in urbanized areas adjacent to services and transportation. Update the Municipal Code for consistency between zoning regulations and General Plan land use designations.	<b>Consistent.</b> The proposed project will be developed on a street with commercial uses located within walking distance and the nearest bus stop is located as near as 80 feet northeast of the project site.
T-4.1: Commute Trip Reduction Program	Institute a commute trip reduction program for employers with fewer than 100 employees (below the requirements of the existing Transportation Demand Management Program). Provide information, training, and incentives to encourage participation.	<b>Consistent.</b> Project Design Feature 4 is provided that requires the applicant to install a board in the employee work area of the Convenience Store and Drive-Thru Restaurant that provides bus route maps and information about carpooling and bicycling to work.
E-1.1: Tree Planting Requirements	Require new development to plant at minimum one 15-gallon nondeciduous, umbrella-form tree per 30 linear feet of boundary length near buildings, per	<b>Consistent.</b> Project Design Feature 5 is provided that requires the applicant to prepare a landscape plan that meets the

**Table N – GHG Reduction Measures for New Developments and Project Consistency**

Local Measure	Measure Description	Project Consistency
	the Municipal Code. Trees shall be planted in strategic locations around buildings or to shade pavement in parking lots and streets.	requirement to plant a minimum of one 15 gallon nondeciduous umbrella form tree per 30 linear feet of boundary length (minimum of 47 trees for the project site).
E-1.2 Cool Roof Requirements	Amend the City Municipal Code to require new non-residential development to use roofing materials having solar reflectance, thermal emittance or Solar Reflectance Index (SRI) consistent with CalGreen Tier 1 values (Table A5.106.11.2.1), and implement through conditions of approval.	<b>Consistent.</b> Project Design Feature 6 is provided that requires the applicant to use roofing material that has a Solar Reflective Index (SRI) of 75 or higher as detailed in Section 140.3 of the 2013 Title 24 Part 6 (CalGren) Building Standards.
E-1.3: Energy Efficient Building Standards	Adopt an ordinance requiring that all new construction exceed the California Energy Code requirements, based on the 2008 Energy Efficiency Standards by 15% (consistent with CalGreen Tier 1), through either the performance based on prescriptive approach described in the California Green Building Code; implement through conditions of approval. Alternatively, a solar photovoltaic system and/or solar water heating may be used to assist in meeting all or a portion of the 15% requirement.	<b>Consistent.</b> The proposed project will be required to be designed to meet Title 24 Part 6 year 2016 Building Energy Efficiency standards that provide over 40% greater efficiency than the 2008 Energy Efficiency Standards.
E-4.1: Landscaping Ordinance	Enforce the City's Assembly Bill 1881 Landscaping Ordinance; implement through conditions of approval.	<b>Consistent.</b> Project Design Feature 5 is provided that requires the Landscape Plan to be designed to be consistent with the requirements of AB 1881.
E-4.2: Indoor Water Conservation Requirements	Amend the City's Uniform Building Code to require development projects to reduce indoor water consumption by 30% (consistent with CalGreen Tier 1, Section A5.303.2.3.1), and implement through conditions of approval.	<b>Consistent.</b> The proposed project will utilize water fixtures that are sold in California that are required to meet CCR Title 20, Sections 1601 – 1608 that require all water fixtures to be low flow and provide an average water use reduction of 30%.
S-1.1: Commercial Recycling	Renegotiate the contract with the waste provider to require curbside recycling for all commercial land uses to divert 65% of commercial solid waste by 2020 and 75% of commercial solid waste by 2030.	<b>Consistent.</b> Project Design Feature 7 is provided that requires the applicant to contract with a waste provider that provides recycling services and diverts a minimum of 65 percent of solid waste generated by the project.
S-1.4: Construction and Demolition Waste Diversion	Amend the Municipal Code to require development projects to divert, recycle or salvage at least 65% of nonhazardous construction and demolition debris generated at the site by 2020 (consistent with CalGreen Tier 1, Section A 5.408.3.1). Require all construction and demolition projects to be accompanied by a waste management plan for the project and a copy of the completed waste management report shall be provided upon completion.	<b>Consistent.</b> Project Design Feature 8 is provided that requires the building contractor for the proposed project to recycle a minimum of 65 percent of the nonhazardous construction debris and to prepare a waste management plan that details how this is achieved.

Source: City of Lake Elsinore Climate Action Plans, December 13, 2011.

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As shown above in Table N, with implementation of Project Design Features 1 through 8, the proposed project is consistent with the applicable local measures provided in the Climate Action Plan as well as the programs and standards that would be implemented as a result of the CAP and Section 7.2 above shows that the proposed project is consistent with the General Plan Update growth projections. ~~In addition, Section 7.7 found that the proposed project would comply with the City's year 2020 efficiency target of 6.6 MTCO<sub>2</sub>e per year and modified year 2030 efficiency target of 3.7 MTCO<sub>2</sub>e per year that has been modified to account for the more stringent GHG emissions reductions required by AB 197 and SB 32.~~ Therefore, the proposed project would comply with the ~~CAP~~Climate Action Plan's local measures and reduction targets and would not conflict with the applicable plan for reducing GHG emissions. Impacts would be less than significant.

### **Level of Significance**

Less than significant impact.

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