

3.5 AIR QUALITY

This section provides a discussion of the potential air quality impacts due to the Proposed Project implementation and build-out. The information in this section is based off of the Air Quality and Greenhouse Gas (GHG) Emissions Impact Analysis (Appendix C) prepared by Vista Environmental in May 2020.

3.5.1 Introduction

The *Historic Town Center Master Plan General Plan Amendment Rezone Draft Environmental Impact Report* (City 2011), prepared by Templeton Planning Group, November 1, 2011, quantified the existing land uses in the HTCMP, which according to City Planning Staff, have not changed since the end of 2011 for the HTC area. In addition, the 2011 HTCMP EIR analyzed a No Project Alternative that would be very similar to the Proposed Project except for the following changes:

- (1) The allowed building height of hotels would be increased from 2 to 3 stories, which potentially could result in 33 percent more hotel rooms than the No Project Alternative discussed in the 2011 HTCMP EIR. This would increase the maximum number of hotel rooms from 214 to 285.
- (2) The FAR for the Retail, Commercial/Office and Civic land uses would be increased from 0.5:1 to 0.75:1 and may be increased to 1.5:1 for buildings that include public gathering spaces. According to City Staff, over half of the existing properties in the HTC currently exceed the 0.5:1 FAR or have other restrictions such as historical designations that would make it very unlikely that these properties would ever be changed with approval of increased FAR. In addition, only a few properties within the HTC are of a large enough size to be capable of incorporating a public gathering space in order to meet the requirements for a FAR of up to 1.5:1. As such, the emissions calculations provided in this analysis are based on 40 percent of the Retail, Commercial/Office, and Civic square footage shown in the No Project Alternative, increased by 50 percent to account for the FAR increase to 0.75:1 and 10 percent of the Retail, Commercial/Office and Civic square footage shown in the No Project Alternative increased by 200 percent to account for the FAR increase to 1.5:1.

The HTCMP Repeal Development Land Use Summary, including a comparison to the HTCMP and existing conditions is shown in Table 3-2.

Table 3-2– HTCMP Repeal Development Land Use Summary

Land Use	Existing Conditions ¹	HTCMP Buildout ¹	HTCMP Repeal Buildout (Proposed Project)	Difference HTCMP Repeal to:	
				HTCMP	Existing
Retail	559,089 SF	532,820 SF	726,816 SF	193,996 SF	167,727 SF
Commercial/Office	103,434 SF	217,099 SF	134,464 SF	(82,635) SF	31,030 SF
Civic	49,872 SF	70,533 SF	64,834 SF	(5,699) SF	14,962 SF
Religious	107,490 SF	107,490 SF	107,490 SF	0	0
Education	77,617 SF	77,617 SF	77,617 SF	0	0
Other	19,385 SF	14,907 SF	19,385 SF	4,478 SF	0
Residential (units)	0	279	0	(279)	0
Hotel (rooms)	0 RM	214 RM	285 RM	71 RM	285 RM

Land Use	Existing Conditions ¹	HTCMP Buildout ¹	HTCMP Repeal Buildout (Proposed Project)	Difference HTCMP Repeal to:	
				HTCMP	Existing
Parking Spaces	3,419 PS	3,716 PS	3,477 PS	(239) PS	58 PS

Notes:

¹ Obtained from Table 3.3-1 of the 2011 HTCMP EIR (Templeton Planning Group, 2011).

² Compared

Definitions: SF = Square Feet; RM = Hotel Room; PS = Parking Space

3.5.2 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.

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 in Table C of Appendix C.

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 in Table D of Appendix C, the Air Basin has been designated by EPA for the national standards as a non-attainment area for ozone and PM2.5 and partial non-attainment for lead. Currently, the Air Basin is in attainment with the national ambient air quality standards for CO, PM10, SO2, and NO2.

In 2015, one or more stations in the Air Basin exceeded the most current federal standards on a total of 146 days (40 percent of the year), including: 8-hour ozone (113 days over 2015 ozone NAAQS), 24-hour PM2.5 (30 days, including near-road sites; 25 days for ambient sites only), PM10 (2 days), and NO2 (1 day). Despite substantial improvement 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 area in the United States. Seven of the top 10 stations in the nation most frequently exceeding the 2015 8-hour ozone NAAQS in 2015 were located within the Air Basin, including stations in San Bernardino, Riverside, and Los Angeles Counties (Vista 2020).

PM2.5 levels in the Air Basin have improved significantly in recent years. By 2013 and again in 2014 and 2015, there were no stations measuring PM2.5 in the Air Basin that violated the former 1997 annual

PM2.5 NAAQS (15.0 µg/m³) for the 3-year design value period. On July 25, 2016 the EPA finalized a determination that the Basin attained the 1997 annual (15.0 µg/m³) and 24-hour PM2.5 (65 µg/m³) NAAQS, effective August 24, 2016. Of the 17 federal PM2.5 monitors at ambient stations in the Air Basin for the 2013-2015 period, five stations had design values over the current 2012 annual PM2.5 NAAQS (12.0 µg/m³), including: Mira Loma (Air Basin maximum at 14.1 µg/m³), Rubidoux, Fontana, Ontario, Central Los Angeles, and Compton. For the 24-hour PM2.5 NAAQS (35.0 µg/m³) there were 14 stations in the Air Basin in 2015 that had one or more daily exceedances of the standard, with a combined total of 25 days over that standard in the Air Basin. While it was previously anticipated that the Air Basin's 24-hour PM2.5 NAAQS would be attained by 2015, this did not occur based on the data for 2013 through 2015. The higher number of days exceeding the 24-hour PM2.5 NAAQS over what was expected is largely attributed to the severe drought conditions over this period that allowed for more stagnant conditions in the Air Basin with multi-day buildups of higher PM2.5 concentrations. This was caused by the lack of storm-related dispersion and rain-out of PM and its precursors (Vista 2020).

The Air Basin is currently in attainment for the federal standards for SO₂, CO, NO₂, and PM₁₀ and Orange County is currently in attainment for the federal standards for lead. While the concentration level of the 1-hour NO₂ federal standard (100 ppb) was exceeded in the Air Basin for one day in 2015 (Long Beach-Hudson Station), the NAAQS NO₂ design value has not been exceeded. Therefore, the Air Basin remains in attainment of the NO₂ NAAQS (Vista 2020).

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 in Table C of Appendix C. 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, PM₁₀ and PM_{2.5}. Currently, the Air Basin is in attainment with the ambient air quality standards for CO, NO₂, SO₂, lead, and sulfates and is unclassified for visibility reducing particles and Hydrogen Sulfide.

The following lists the State of California Code of Regulations (CCR) air quality emission rules that are applicable, but not limited to all warehouse projects in the State.

Assembly Bill 2588

The Air Toxics “Hot Spots” Information and Assessment Act (Assembly Bill [AB] 2588, 1987, Connelly) was enacted in 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 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 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.

Regional – Southern California

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 PM2.5 (12 µg/m3) 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 PM2.5 (35 µg/m3) by 2019 (updated from the 2012 AQMP)

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 PM2.5 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 NOx 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 NOx control measures have been provided in the 2012 AQMP even though the primary purpose was to show compliance with 24-hour PM2.5 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.

The following lists the SCAQMD rules that are applicable but not limited to all land development projects in the Air Basin.

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.

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.

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 2019 Federal Transportation Improvement Program (FTIP), adopted September 2018, 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 San Juan Capistrano

The City of San Juan Capistrano General Plan, adopted December 1999, provides the following air quality-related goals and policies that are applicable to the Proposed Project.

Conservation & Open Space Goal 6: Improve Air Quality

Policy 6.1: Cooperate with the South Coast Air Quality Management District and Southern California Association of Governments in their efforts to implement the regional Air Quality Management Plan.

Policy 6.2: Implement City-wide traffic flow improvements.

Policy 6.3: Achieve a greater balance between jobs and housing in San Juan Capistrano.

Policy 6.4: Integrate air quality planning with land use and transportation planning.

Policy 6.5: Cooperate and participate in regional air quality. management planning, programs, and enforcement measures.

Policy 6.6: Promote energy conservation and recycling by the public and private sectors.

3.5.3 Existing Environmental Setting

The Project site is located within Orange 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 Orange County. The Air Basin is located on a coastal plain with connecting broad valleys and low hills to the east. Regionally, the Air Basin is bounded by the Pacific Ocean to the southwest and high mountains to the east forming the inland perimeter.

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_x emissions and 40 percent of directly emitted PM_{2.5}, with another 10 percent of PM_{2.5} from road dust. The 2016 AQMP found that since 2012 AQMP projections were made stationary source VOC emissions have decreased by approximately 12 percent, but mobile VOC emissions have increased by 5 percent. The percentage of NO_x emissions remain unchanged between the 2012 and 2016 projections.

SCAQMD has divided the Air Basin into 38 air-monitoring areas with a designated ambient air monitoring station representative of each area. The Project site is located in Air Monitoring Area 21, which covers the southeastern portion of Orange County. Since not all air monitoring stations measure all of the tracked pollutants, the data from the following two monitoring stations, listed in the order of proximity to the Project site have been used; Mission Viejo Monitoring Station (Mission Viejo Station) and Costa Mesa Monitoring Station (Costa Mesa Station).

The Mission Viejo Station is located approximately nine miles north of the Project site at 26081 Via Pera, Mission Viejo and the Costa Mesa Station is located approximately 18 miles northwest of the Project site at 2850 Mesa Verde Drive East, Costa Mesa. The monitoring data is presented in Table F of Appendix C and shows the most recent three years of monitoring data from CARB. Ozone, PM₁₀ and PM_{2.5} were measured at the Perris Station and NO₂ was measured at the Costa Mesa Station. 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 SCAQMD defines sensitive receptors as residences, hospitals, and convalescent facilities where an individual may remain for 24 hours or more. The nearest sensitive receptors to the HTC Area are the residences located on the west side of the railroad, approximately 40 feet west of the HTC Area. The nearest schools to the HTC Area are San Juan Elementary School located on the north side of Spring Street, approximately 60 feet north of the HTC Area and Junipero Serra High School located on the north side of Acjachema Street, approximately 40 feet north of the HTC Area.

Further details on the atmospheric setting of the Project site can be found in Section 6 of Appendix C.

3.5.4 Impacts and Mitigation

Impact 3.5-1: Would the Project conflict with or obstruct implementation of the applicable air quality 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 GP 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.
- (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 and ongoing operations of the potential buildout 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 in Appendix C. However, as detailed above, the Project is a repeal of a Master Plan and the adoption of proposed land use regulations, and therefore, no specific projects are being evaluated. As such it is not possible at this time to assess if a significant construction-related local impact may be created from a potential future development that may occur in the future under the land use regulations adopted through the Proposed Project. Therefore, there is a potential for a significant construction-related local air quality impact to occur from implementation of the Proposed Project.

Mitigation Measure AQ-1 has been incorporated into this analysis and requires all future development projects within the HTC Area that require either earthmoving activities or extensive demolition or building construction to prepare a project specific air quality assessment that analyzes the construction and operational regional and localized air impacts created from the specific project and address all CEQA-related air quality and GHG emissions checklist questions. If the air quality assessment finds a significant

impact, the air quality assessment shall develop all feasible mitigation measures that could avoid or reduce those impacts.

Therefore, based on the information provided above, even with implementation of Mitigation Measure AQ-1, the Proposed Project would have the potential to result in significant, unavoidable impacts.

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 ensure 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.

The Proposed Project would consist of removing inconsistencies that currently exist between the HTCMP, General Plan and FBC. The proposed revisions to the HTCMP have the potential to result in slightly higher densities of non-residential land uses within the HTC, while removing the residential component within the HTC. The RTP/SCS promotes higher densities for areas that are in close proximity to transit hubs as well as walkable communities. Since, the entire HTC area is within walking distance of the San Juan Capistrano Metrolink/Amtrak Station, the Project would conform to the strategies provided in the RTP/SCS. 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, even with implementation of Mitigation Measure AQ-1, the Proposed Project could potentially result in an inconsistency with the SCAQMD AQMP. Therefore, a significant and unavoidable impact will occur in relation to implementation of the AQMP.

Impact 3.5-2: Would the Project 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?

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. 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 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 Appendix C. 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 3-3 and the CalEEMod daily printouts are shown in Appendix C.

Table 3-3– Construction-Related Regional Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Demolition ¹	2.70	25.75	21.02	0.04	1.41	1.20
Site Preparation ¹	3.24	33.12	20.21	0.04	9.94	6.01
Grading ¹	3.70	38.89	29.61	0.06	5.76	3.18
Building Construction (2022)	2.96	25.63	26.14	0.08	4.35	1.74
Building Construction (2022)	2.71	22.01	25.36	0.08	4.23	1.63
Paving	1.16	10.22	14.98	0.02	0.68	0.51
Architectural Coating	73.17	1.40	3.13	0.03	0.63	0.22
Maximum Daily Construction Emissions	73.17	38.89	29.61	0.08	9.94	6.01
SCQAMD Thresholds	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Notes:

¹ Demolition, Site Preparation and Grading based on adherence to fugitive dust suppression requirements from SCAQMD Rule 403.

Source: CalEEMod Version 2016.3.2.

Table 3-3 shows that none of the analyzed criteria pollutants would exceed the regional emissions thresholds during either demolition, 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. As detailed above, the Project is a repeal of a Master Plan and the adoption of proposed land use regulations, and therefore, no specific projects are being evaluated. As such it is not possible at this time to assess if a significant construction-related local impact may be created from a development that may occur in the future under the land use regulations adopted through the Proposed Project. Therefore, there is a potential for a significant construction-related local air quality impact to occur from implementation of the Proposed Project.

Mitigation Measure AQ-1 has been incorporated into this analysis that requires all future development projects within the HTC Area that require either earthmoving activities or extensive demolition or building construction to prepare a project specific air quality assessment that analyzes the construction and operational regional and localized air impacts created from the specific project and address all CEQA-related air quality and GHG emissions checklist questions. If the air quality assessment finds a significant

impact, the air quality assessment shall develop all feasible mitigation measures that could avoid or reduce those impacts. Therefore, even with implementation of Mitigation Measure AQ-1, a potentially significant local air quality impact could 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, emissions from energy usage, and onsite area source emissions created 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 with the on-going operations of the Proposed Project.

Operations-Related Regional Criteria Pollutant Analysis

The operations-related regional criteria 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 Appendix C. The worst-case summer or winter VOC, NOx, CO, SO₂, PM₁₀, and PM_{2.5} daily emissions created from the Proposed Project’s long-term operations have been calculated and are summarized below in Table 3-4 and the CalEEMod daily emissions printouts are shown in Appendix C.

Table 3-4 – Operational Regional Criteria Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Area Sources ¹	14.03	0.00	0.06	0.00	0.00	0.00
Energy Usage ²	0.44	4.01	3.37	0.02	0.30	0.30
Mobile Sources ³	6.45	33.05	74.11	0.39	47.09	12.70
Total Emissions	20.93	37.06	77.53	0.41	47.40	13.01
SCQAMD Operational Thresholds	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Notes:

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

² Energy usage consist of emissions from natural gas usage.

³ Mobile sources consist of emissions from vehicles and road dust.

Source: Calculated from CalEEMod Version 2016.3.2.

The data provided in Table 3-5 below 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.

In *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (also referred to as “Friant Ranch”), the California Supreme Court held that when an EIR concluded that when a project would have significant impacts to air quality impacts, an EIR should “make a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.” The Court developed a three part test that includes the following:

- 1) The air quality discussion shall describe the specific health risks created from each criteria pollutant, including diesel particulate matter.

The analysis in Appendix C, Section 2.0 details the specific health risks created from each criteria pollutant. In addition, the specific health risks created from diesel particulate matter is detailed in Appendix C. As such, this analysis meets the part 1 requirements of the Friant Ranch Case.

- 2) The analysis shall identify the magnitude of the health risks created from the Project. The Ruling details how to identify the magnitude of the health risks. Specifically, on page 24 of the ruling it states “The Court of Appeal identified several ways in which the EIR could have framed the analysis so as to adequately inform the public and decision makers of possible adverse health effects. The County could have, for example, identified the Project’s impact on the days of nonattainment per year.”

Table 3-4 above shows that the primary source of operational air emissions would be created from mobile source emissions that would be generated throughout the Air Basin. As such, any adverse health impacts created from the Proposed Project should be assessed on a basin-wide level, since the air emissions created from implementation of the Project would have the potential to impact a large portion of the Basin. As indicated above in Table 3-2, the Air Basin has been designated by EPA for the national standards as a non-attainment area for ozone, PM2.5, and partial non-attainment for lead. In addition, PM10 has been designated by the State as non-attainment. It should be noted that VOC and NOx are ozone precursors, as such they have been considered as non-attainment pollutants. According to the 2016 AQMP, in 2016 the total emissions of: VOC was 500 tons per year; NOx was 522 tons per year; SOx was 18 tons per year; and PM2.5 was 66 tons per year. Since the 2016 AQMP did not calculate total PM10 emissions, the total PM10 emissions were obtained from The California Almanac of Emissions and Air Quality 2013 Edition, prepared by CARB, for the year 2020. The Project contribution to each criteria pollutant in the Air Basin is shown in Table 3-5.

Table 3-5 – Project’s Contribution to Criteria Pollutants in the South Coast Air Basin

Emissions Source	Pollutant Emissions (pounds/day)					
	VOC	NOx	CO	SO ₂	PM10	PM2.5
Project Emissions ¹	20.93	37.06	77.53	0.41	47.40	13.01
Total Emissions in Air Basin ²	1,000,000	1,044,000	4,246,000	36,000	322,000	132,000
Project’s Percent of Air Emissions	0.0021%	0.0036%	0.0018%	0.00112%	0.015%	0.0099%

Notes:

¹ From the project’s total operational emissions shown above in 3-4.

² VOC, NOx, CO, SO₂ and PM2.5 from 2016 AQMP and PM10 from the California Almanac of Emissions and Air Quality 2013 Edition.

Development that could cause increased pollutants within the Project area would be limited to either the few undeveloped sites remaining, or renovation or redevelopment of existing buildings within the Project area. Therefore, the potential for increased amounts of criteria pollutants is considered low, as outlined in Table 3-4 and 3-5. As shown in Table 3-5, the Project would increase criteria pollutant emissions by as much as 0.0015 percent for PM10 in the South Coast Air Basin. Due to these nominal increases in the Air Basin-wide criteria pollutant emissions and the fact that none of the criteria pollutant emissions would exceed existing thresholds, no increases in days of non-attainment are anticipated to occur from operation of the Proposed Project. As such, this analysis meets the Part 2 requirements of the Friant Ranch Case.

- 3) If addressing the magnitude of the health risk is not possible, then explain why not possible. Also explain if any mitigation provided is deferred mitigation.

Since Part 2 adequately explains the magnitude of the health risks created by implementation of the Project onto the Air Basin through outlining the Project's percent of air emissions in the Air Basin, Part 3 is limited to analyzing if Mitigation Measure AQ-1 is deferred mitigation. Mitigation Measure AQ-1 requires all future development projects within the HTC Area that require either earthmoving activities or extensive demolition or building construction to prepare a project specific air quality assessment that analyzes the construction and operational regional and localized air impacts created from the specific project and address all CEQA-related air quality and GHG emissions checklist questions. If the air quality assessment finds a significant impact, the air quality assessment shall develop all feasible mitigation measures that could avoid or reduce those impacts. Since the Mitigation cannot guarantee that all future development meet the air quality thresholds, it is possible for a specific development project to be constructed in the Project Area that would create significant levels of air emissions could have the potential to create adverse health impacts. As such, this analysis meets the Part 3 requirements of the Friant Ranch Case. However, even with implementation of Mitigation Measure AQ-1, impacts would be significant and unavoidable.

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 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 technologies on industrial facilities, CO concentrations in the Air Basin and in the state have steadily declined. According to the SCAQMD Air Quality Data Tables, in 2007 the Saddleback Valley had maximum CO concentrations of 3 ppm for 1 hour and 2.2 ppm for 8-hours and in 2018 the Saddleback Valley had maximum CO concentrations of 1.2 ppm for 1-hour and 0.9 ppm for 8-hours, which represent decreases in CO concentrations of 60 percent and 59 percent, respectively between 2018 and 2007. 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. Since the nearby intersections to the Proposed Project are much smaller with less traffic than what was analyzed by the SCAQMD and since the CO concentrations are now approximately 60 percent lower than when CO was designated in attainment in 2007, 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. As detailed above, the Project is a repeal of a Master Plan and the adoption of proposed land use regulations, and therefore, no specific development projects are being evaluated. As such it is not possible at this time to assess if a significant operation-related local impact may be created from a development that may occur with implementation of the Proposed Project. Therefore, there is a potential for operation-related local air quality impact to occur from implementation of the Proposed Project.

Mitigation Measure AQ-1 has been incorporated into this analysis that requires future development projects within the HTC Area that require either earthmoving activities or extensive demolition or building construction to prepare a project specific air quality assessment that analyzes the construction and operational regional and localized air impacts created from the specific project and address all CEQA-related air quality and GHG emissions checklist questions. If the air quality assessment finds a significant impact, the air quality assessment shall develop all feasible mitigation measures that could avoid or reduce those impacts. Therefore, even with implementation of Mitigation Measure AQ-1, a potentially significant local air quality impact would occur from operation of the Proposed Project.

Therefore, the Proposed Project could result in a cumulatively considerable net increase of any criteria pollutant, and this impact is considered significant and unavoidable.

Impact 3.5-3: Would the Project expose sensitive receptors to substantial pollutant concentrations?

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 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 to the HTC Area are the residences located on the west side of the railroad, approximately 40 feet west of the HTC Area. The nearest schools to the project site are San Juan Elementary School located on the north side of Spring Street, approximately 60 feet north of the HTC Area and Junipero Serra High School located on the north side of Acjachema Street, approximately 40 feet north of the HTC Area.

Construction-Related Sensitive Receptor Impacts

The construction activities that may occur for implementation of the Proposed Project would typically include: 1) Demolition, 2) Site preparation, 3) Grading, 4) Building construction, 5) Paving, and 6) Application of architectural coatings. Construction activities 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

As detailed above, the Project is a repeal of a Master Plan and the adoption of proposed land use regulations, and therefore, no specific development projects are being evaluated. As such it is not possible

at this time to assess if a significant construction-related local impact may be created from a development that may occur with implementation of the Proposed Project. Therefore, there is a potential for construction-related local air quality impact to occur from implementation of the Proposed Project.

Mitigation Measure AQ-1 has been incorporated into this analysis that requires future development projects within the HTC Area that require either earthmoving activities or extensive demolition or building construction to prepare a project specific air quality assessment that analyzes the construction and operational regional and localized air impacts created from the specific project and address all CEQA-related air quality and GHG emissions checklist questions. If the air quality assessment finds a significant impact, the air quality assessment shall develop all feasible mitigation measures that could avoid or reduce those impacts. Therefore, even with implementation of Mitigation Measure AQ-1, construction activities that may occur from implementation of the Proposed Project would have a significant and unavoidable construction-related impact to local air quality.

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. It should be noted that the most current cancer risk assessment methodology recommends analyzing a 30 year exposure period for the nearby sensitive receptors (Vista 2020).

Given the relatively limited number of heavy-duty construction equipment, the varying distances that construction equipment would operate to the nearby sensitive receptors, and the short-term construction schedule, the Proposed Project would not result in a long-term (i.e., 30 or 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, 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, since the majority if not all construction within the HTC Area would occur in 2023 or later, when the most stringent equipment standards will be in effect, 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 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

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. As detailed above, the Project is a repeal of a Master Plan and the adoption of proposed land use regulations, and therefore, no specific projects are being evaluated. As such it is not possible at this time assess if a significant operation-related local impact may be created from a development that may occur with implementation of the Proposed Project. Therefore, there is a potential for operation-related local air quality impact to occur from implementation of the Proposed Project.

Mitigation Measure AQ-1 has been incorporated into this analysis that requires future development projects within the HTC Area that require either earthmoving activities or extensive demolition or building construction to prepare a project specific air quality assessment that analyzes the construction and operational regional and localized air impacts created from the specific project and address all CEQA-related air quality and GHG emissions checklist questions. If the air quality assessment finds a significant impact, the air quality assessment shall develop all feasible mitigation measures that could avoid or reduce those impacts. However, even with implementation of Mitigation Measure AQ-1, a potentially significant local air quality impact could occur from operation of the Proposed Project.

Operations-Related Toxic Air Contaminant Impacts

Particulate matter (PM) from diesel exhaust is the predominant TAC in most areas and according to The California Almanac of Emissions and Air Quality 2013 Edition, prepared by CARB, about 80 percent of the outdoor TAC cancer risk is from diesel exhaust. Some chemicals in diesel exhaust, such as benzene and formaldehyde have been listed as carcinogens by State Proposition 65 and the Federal Hazardous Air Pollutants program. Due to the nominal number of diesel truck trips that are anticipated to be generated by implementation of the Proposed Project, a less than significant TAC impact would occur during the on-going operations of the Proposed Project and no mitigation would be required.

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

Impact 3-5-4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

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

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.

Operations-Related Odor Impacts

The Proposed Project would consist of removing inconsistencies that currently exist between the HTCMP, General Plan and FBC. The proposed revisions to the HTCMP have the potential to result in slightly higher densities of non-residential land uses within the HTC, while removing the residential component within the HTC. Land uses typically associated with odors include wastewater treatment facilities, waste-disposal facilities, specialized industrial uses that include chemical manufacturing, fiberglass manufacturing, and painting/coating operations, or agricultural operations. None of these types of uses would be allowed within the HTC Area. As such, the Project's long-term operational activities are not anticipated to create odor emissions that would generate numerous odor complaints. Therefore, a less than significant odor impact would occur from operation of the Proposed Project and no mitigation would be required.

Mitigation Measures

MM AQ-1: All land use development projects within the HTC Area that require either earthmoving activities or extensive demolition or building construction shall prepare a project specific air quality assessment that analyzes the construction and operational regional and localized air impacts created from the specific project and addresses all CEQA-related air quality and greenhouse gas emissions checklist questions. If the air quality assessment finds a significant impact, the air quality assessment shall develop all feasible mitigation measures that could avoid or reduce those impacts.

3.5.5 Residual Impacts After Mitigation

Even with implementation of MM AQ-1, air quality impacts would remain significant and unavoidable.