4.3 Air Quality

This section describes existing air quality conditions, regulatory framework, and potential impacts from the construction and operation of the Proposed Project, as well as measures proposed to reduce potential adverse impacts. Air emissions will be generated during both the construction and operation of the Proposed Project. This section analyzes potential air quality impacts associated with the short-term construction and long-term operation of the Proposed Project and identifies potential measures to lessen and/or avoid significant adverse project-related air quality impacts. The significance of potential air quality impacts were determined using significance criteria established through CEQA and adopted by the South Coast Air Quality Management District (SCAQMD).

Project components that will not result in any air emissions are not discussed. These components include upgrades at the Newhall, Chatsworth, and San Fernando Substations including installation of upgraded relay systems, current transformer connections, and dedicated digital communication.,.

4.3.1 Existing Air Quality Setting

The Proposed Project is located in the county of Los Angeles, within the South Coast Air Basin (SCAB). The SCAB is a sub-area of the SCAQMD jurisdiction that is bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The facility operates under a Title V and RECLAIM Permit (SCAQMD Facility No. 800128). It is a 6,600-square-mile area that encompasses all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. In terms of overall air quality, the SCAB is considered to have some of the worst air quality in the United States. The SCAQMD is the regulatory agency responsible for ensuring that the SCAB meets or has plans to meet both Federal and State air quality standards.

4.3.1.1 Climate

Air quality in a region is primarily affected by the type and amount of contaminants emitted into the atmosphere in the region. However, topographical, and meteorological conditions such as temperature, wind, humidity, precipitation, cloud cover, and influx of solar radiation significantly impact the dispersion or trapping of the emitted pollutants, thus playing a major role in the prevailing air quality conditions. Within the SCAB, frequent formation of inversion layers traps the air pollutants in the basin leading to increased pollution episodes. The SCAB has low mixing heights and light winds, which are conducive to the accumulation of air pollutants.

Temperature has a significant impact on wind flow, pollutant dispersion, vertical mixing, and photochemistry within the region. Annual average temperatures throughout the SCAB vary from the low to middle 60 degree Fahrenheit (ºF). January is the coldest month throughout the SCAB, with average minimum temperatures of 47ºF in downtown Los Angeles and 36ºF in San Bernardino. All portions of the SCAB have recorded maximum temperatures above 100ºF. More than 90 percent of the rainfall in the region occurs from November through April. Annual average rainfall varies from approximately nine inches in Riverside to 14 inches in downtown Los Angeles. Monthly and yearly rainfall totals are extremely variable. Summer rainfall usually consists of widely scattered thundershowers near the coast and slightly heavier shower activity in the eastern portion of the region and near the mountains. Rainy days comprise 5 percent to 10 percent of all days in the SCAB, with the frequency being higher near the coast. The nearest meteorological station to the Proposed Project site is the Burbank Valley station,

which recorded annual average high and low temperatures of 77.9°F and 50.9°F respectively, from 1939 to 1990. The average annual rainfall measured during the same period was 22.2 inches.

The importance of wind to air pollution is considerable. The direction and speed of the wind determines the horizontal dispersion and transport of air pollutants. During the late autumn to early spring rainy season, the SCAB is subjected to wind flows associated with traveling storms moving through the region from the northwest. This period also brings 5 periods to 10 periods of strong, dry offshore winds, locally termed "Santa Anas" each year. During the dry season, which coincides with the months of maximum photochemical smog concentrations, the wind flow is bimodal, typified by a daytime onshore sea breeze and a nighttime offshore drainage wind.

The vertical dispersion of air pollutants in the SCAB is frequently restricted by the presence of a persistent temperature inversion in the atmospheric layers near the earth's surface. Normally, the temperature of the atmosphere decreases with altitude; however, when the temperature of the atmosphere increases with altitude, the phenomenon is termed an inversion. An inversion condition can exist at the surface or at any height above the ground. The bottom of the inversion, known as the mixing height, is the height of the base of the inversion.

In general, inversions in the SCAB are lower before sunrise than during the daylight hours. As the day progresses, the mixing height normally increases as the warming of the ground heats the surface air layer. As this heating continues, the temperature of the surface layer approaches the temperature of the base of the inversion layer. When these temperatures become equal, the inversion layer's lower edge begins to erode, and if enough warming occurs, the layer breaks up. The surface layers are gradually mixed upward, diluting the previously trapped pollutants. The breakup of inversion layers frequently occurs during mid- to late-afternoon on hot summer days. Winter inversions usually break up by mid-morning.

4.3.1.2 Ambient Air Quality

Health-based air quality standards have been established by the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) for the following criteria air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter less than 10 microns (PM_{10}) and 2.5 microns in diameter ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. The Federal standards are called National Ambient Air Quality Standards (NAAQS), and the California standards are called California Ambient Air Quality Standards (CAAQS).

The USEPA classifies air basins as either attainment or "non-attainment" for each criteria pollutant based on whether or not the NAAQS have been achieved. Some air basins have not received sufficient analysis for certain criteria air pollutants and are designated as "unclassified" for those pollutants. Similarly, areas have been designated as attainment, non-attainment, or unclassified with respect to the CAAQS. The CAAQS and NAAQS and the corresponding attainment status for the SCAB are listed in Table 4.3-1. The SCAB is non-attainment for both the Federal and State ozone, PM_{10}, and $PM_{2.5}$ standards.

Table 4.3-1 State and Federal Ambient Air Quality Standards

South Coast Air Basin Attainment Status					
Pollutant	**Averaging Time**	**California Standards**		**Federal Standards**	
		Concentration	**Attainment Status**	**Concentration**	**Attainment Status**
Ozone	1-hr	0.09 ppm	Non-attainment	--	--
	8-hr	0.070 ppm	Non-attainment	0.075 ppm	Non-attainment
PM_{10}	24-hr	50 µg/m^3	Non-attainment	150 µg/m^3	Non-attainment
	Annual Arithmetic Mean	20 µg/m^3	--		--
$PM_{2.5}$	24-hr	No separate state standard	Non-attainment	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	--	15 µg/m^3	--
Carbon Monoxide (CO)	8-hr	9.0 ppm	Attainment/ Unclassifiable	9 ppm	Attainment/ Unclassifiable
	1-hr	20.0 ppm	--	35 ppm	--
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm	--	0.053 ppm	--
	1-hr	0.18 ppm	Attainment/ Unclassifiable	--	Attainment/ Unclassifiable
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	--	--	0.030 ppm	--
	24-hr	0.04	Attainment/ Unclassifiable	0.14 ppm	Attainment/ Unclassifiable
	1-hr	0.25 ppm	--	--	--
Lead	30-day Average	1.5 µg/m^3	Attainment/ Unclassifiable	--	--
Visibility Reducing Particles	8-hour	See note below	Attainment/ Unclassifiable	N/A	N/A
Sulfates	24-hour	25 µg/m^3	Attainment/ Unclassifiable	N/A	N/A
Hydrogen Sulfide	1-hour	0.03 ppm	Attainment/ Unclassifiable	N/A	N/A
Vinyl Chloride	24-hour	0.01 ppm	Attainment/ Unclassifiable	N/A	N/A

Source: California Air Resources Board; USEPA Green Book

Note: Visibility Reducing Particles: Extinction coefficient of 0.23 per kilometer - visibility of 10 miles or more (0.07-mile to 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent.

The SCAB has until 2024 to achieve the Federal 8-hour ozone ambient air quality standard, and has until 2010 to achieve the Federal 24-hour $PM_{2.5}$ standard, but is requesting the USEPA for a 5- year extension due to the severity of the $PM_{2.5}$ problem. Currently, the SCAB meets the 24-hour average Federal PM_{10} standard and is expected to continue to meet the standard through 2015.

The SCAQMD has 38 air quality monitoring stations that monitor and collect ambient air quality measurements for these specific pollutants within the basin. The nearest monitoring station to the Proposed Project is located in Reseda, ~ 7 miles south of the proposed Central Compressor Station site. Monitoring stations are also located in Santa Clarita and Burbank, ~ 8.5 miles northeast and 17 miles

southeast of the proposed Central Compressor Station, respectively. Table 4.3-2 summarizes the pollutants monitored and the approximate distances of the monitoring stations from the Project compressor station. Table 4.3-3 summarizes the ambient air quality data collected for the years 2006 through 2008. The air quality data is complied from the Reseda station for NO_2, CO, and ozone and from the Burbank station for PM_{10}, $PM_{2.5}$, and SO_2.

Table 4.3-2 Air Quality Monitoring Stations Near the Project

Monitoring Site	Address	Pollutant						Location	
		CO	NO_2	O_3	PM_{10}	$PM_{2.5}$	SO_2	Miles	Direction
Reseda	18330 Gault Street	X	X	X	--	--	--	7.0	SW
Santa Clarita	22224 Placerita Canyon Road	X	X	X	X	--	--	8.5	E
Burbank	228 W Palm Avenue	X	X	X	X	X	X	17	SW

As shown in Table 4.3-3, CO, NO_2 and SO_2 concentrations recorded at the nearby monitoring station are well below federal and state standards. Ozone concentrations have exceeded federal and state AAQS between 2006 and 2008. Measured PM_{10} and $PM_{2.5}$ concentrations at the monitoring stations have also exceeded state standards over the past three years.

Table 4.3-3 Background Air Quality Data (2006 - 2008)

Constituent	Maximum Observed Concentration (Number of Standard Exceedances - most restrictive)				
	State Standard	Federal Standard	2006	2007	2008
CO					
1-hr	20.0 ppm	35.0 ppm	5.0 (0 days)	4.0 (0 days)	2.48 (0 days)
8-hr	9.0 ppm	9.5 ppm	3.48 (0 days)	2.76 (0 days)	2.88 (0 days)
Ozone					
1-hr	0.09 ppm	0.12 ppm	0.123 (23 days)	0.129 (21 days)	0.158 (34 days)
8-hr	0.07 ppm	0.08 ppm	0.109 (55 days)	0.105 (43 days)	0.103 (39 days)
NOx					
1-hr	0.25 ppm	---	0.073 (0 days)	0.081 (0 days)	0.091 (0 days)
Annual	---	0.053 ppm	0.018	0.018	0.018
SOx					
1-hr	0.25 ppm	---	0.01 (0 days)	0.01 (0 days)	0.11 (0 days)
3-hr	---	0.5 ppm	---	---	---
24-hr	0.04 ppm	0.14 ppm	0.004 (0 days)	0.003 (0 days)	0.003 (0 days)
Annual	---	0.03 ppm	0.001	0.001	0.001
PM_{10}					
24-hr	50 µg/m^3	150 µg/m3	71 (10 days)	109 (5 days)	66 (5 days)
Annual	20 µg/m^3	--	37	33	---

Table 4.3-3 Background Air Quality Data (2006 - 2008)

Constituent	Maximum Observed Concentration (Number of Standard Exceedances - most restrictive)				
	State Standard	Federal Standard	2006	2007	2008
$PM_{2.5}$					
24-hr	12 µg/m^3	65 µg/m^3	50.7 (22 days)	56.5 (---)	57.4 (---)
Annual	--	35 µg/m^3	16.5	16.9	---

Source: CARB Air Quality Data Statistics (CARB, 2009a). NOx, volatile organic compounds (VOCs), and CO are from Reseda Monitoring Station; PM_{10}, $PM_{2.5}$ and SO_2 are from Burbank Monitoring Station. '---' denotes insufficient or no data. SCAQMD provides monitoring data to CARB's Air Quality Monitoring Network, represented in Table 4.3-3; data also available at www.aqmd.gov/smog/historicaldata.html

4.3.1.3 Regulatory Framework

Most Federal programs to monitor and regulate stationary source emissions are delegated to regional air quality management districts, such as the SCAQMD, in California. State programs administered through the CARB primarily control air quality pollutants from the operation of mobile sources. Federal, State and local authorities have adopted various rules and regulations requiring evaluation of the impact on air quality of a planned project and appropriate mitigation for air pollutant emissions. A brief description of the regulatory setting and planning efforts is given below.

Federal Plans, Policies, Regulations and Laws

The Federal government first adopted the Clean Air Act (CAA) in 1963 to improve air quality and protect citizen's health and welfare. The CAA established two types of national air quality standards: primary standards set limits to protect public health, including the health of "sensitive" populations such as asthmatics, children, and the elderly, and secondary standards set limits to protect public welfare, including protection against decreased visibility, or damage to animals, crops, vegetation, and buildings. The USEPA has established NAAQS for six principal or "criteria" pollutants. Pursuant to the CAA, USEPA classifies air basins (i.e., distinct geographic regions) as either attainment or "non-attainment" for each criteria pollutant, based on whether or not the Federal ambient air quality standards have been achieved. Some air basins have not received sufficient analysis for certain criteria air pollutants and are designated as "unclassified" for those pollutants. The SCAQMD and CARB are the responsible agencies for providing attainment plans and for demonstrating attainment of these standards. The USEPA reviews and approves these plans and regulations that are designed to achieve attainment and maintain attainment status with the NAAQS.

The USEPA enforces a number of regulations under the authority of the federal CAA (such as Standards of Performance for New Stationary Performance Source [NSPS], National Emission Standards for Hazardous Air Pollutants [NESHAPs], Prevention of Significant Deterioration [PSD], New Source Review [NSR], etc.); however, these regulations do not apply to the Proposed Project as the Proposed Project does not include any major stationary emission sources. The USEPA also enforces on-road and off-road

engine emission reduction programs that indirectly affect the Proposed Project's emissions through the phasing in of cleaner on- and off-road equipment engines.

State Plans, Policies, Regulations and Laws

California Clean Air Act. The CARB is responsible for implementing the California Clean Air Act (CCAA) and the federal CAA. The CCAA requires that each area exceeding the state ambient air quality standards to develop a plan aimed at achieving those standards. The California Health and Safety Code, Section 40914, requires air districts to design a plan that achieves an annual reduction in district-wide emissions of 5 percent or more, averaged every consecutive 3-year period. To satisfy this requirement, the local Districts' are required to develop and implement air pollution reduction measures, which are described in their Air Quality Management Plans (AQMPs) and outline strategies for achieving the state ambient air quality standards for criteria pollutants for which the region is classified as non-attainment.

AB 32 California Global Warming Solutions Act of 2006. California's major initiatives for reducing climate change or greenhouse gas (GHG) emissions are outlined in Assembly Bill 32 (signed into law in 2006). These initiatives require GHG emissions to be reduced to 1990 levels by 2020 - a reduction of about 25 percent, and to be reduced 80 percent below 1990 levels by 2050. The AB 32 Scoping Plan contains the main strategies California will use to reduce the GHGs that cause climate change. The Scoping Plan has a range of GHG reduction actions which include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system; these measures have been introduced through various workshops and continue to be developed.

The CEQA guidelines have not yet been amended to include GHG significance thresholds. The State Office of Planning and Research (OPR) issued draft CEQA regulations for review in April 2009; amendment review and rulemaking will be conducted during 2009. CEQA revisions including GHG thresholds are not anticipated to be finalized until after the CPCN for the Proposed Project has been filed with the CPUC.

Regional and Local Plans, Policies, Regulations and Ordinances

The SCAQMD is the regional agency responsible for the regulation and enforcement of Federal, State, and local air pollution control regulations in the SCAB. The SCAQMD has the responsibility of ensuring that Federal and State ambient air quality standards are achieved and maintained in the SCAB. SCAQMD rules and regulations require that any equipment that emits or controls air contaminants be permitted prior to construction, installation, or operation (Permit to Construct or Permit to Operate). The SCAQMD also has visible emissions, nuisance, and fugitive dust regulations which are applicable to the Proposed Project during construction activities. These specific regulations include SCAQMD Rule 401 (Visible Emissions); SCAQMD Rule 402 (Nuisance); and SCAQMD Rule 403 (Fugitive Dust). The intent of these rules is to limit the amount of visible emissions and fugitive dust generated from emission sources and to ensure emitted pollutants do not cause a public nuisance. SCAQMD Rule 403 provides control measures to reduce overall fugitive dust emissions from construction activities. Based on the description of the construction activities for the Proposed Project, the amount of soil to be excavated, and the acreage of the disturbed areas, the Proposed Project does not classify as a "large operation." However, to minimize fugitive dust emissions, feasible fugitive dust control measures as stated in the

applicable rules would be implemented as APMs to reduce potential impacts to off-site receptors (SCAQMD, 2009a).

4.3.2 Significance Criteria

Based on significance criteria from the CEQA checklist, the Proposed Project would result in a significant impact on air quality if it would:

- 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 Proposed 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; or
- Create objectionable odors affecting a substantial number of people.

For the purposes of evaluating the air quality impacts of a project under CEQA, the SCAQMD has established quantitative thresholds that are used to evaluate the Project impacts. These significance thresholds are listed in Table 4.3-4 and include both emissions and concentration-related significance thresholds.

In addition, the SCAQMD has also developed a localized significance threshold (LST) methodology to evaluate the potential localized impacts of criteria pollutants from construction and operational activities (SCAQMD, 2008). The localized significance threshold methodology requires an analysis regarding whether or not emissions of specified criteria pollutants would cause ambient air quality standards to be exceeded at the nearest off-site receptor. The localized significance threshold analysis is performed for emissions of CO, NO_2, PM_{10} and $PM_{2.5}$. The SCAQMD has developed localized significance thresholds lookup tables that utilize the allowable concentrations of pollutants (shown in Table 4.3-4) combined with distances from the construction or operational areas to calculate allowable emission rates. The lookup tables are specific for the source/receptor area in the basin as they also include pollutant background and meteorological data-specific to the area. For sources that do not fit the construction or operational criteria in the lookup tables, source-specific modeling is conducted to estimate the receptor pollutant concentration and assess whether it is below the values shown in Table 4.3-4. The lookup tables can only be used for projects less than five acres in size and requires knowledge of the distance from the project site to the nearest offsite receptor. The Proposed Project is greater than five acres; therefore SCAQMD localized thresholds have not been included in this analysis.

Table 4.3-4 Air Quality Significance Thresholds

Pollutant	Construction	Operation
Criteria Pollutants Mass Daily Thresholds		
NO_x	100 pounds per day (lbs/day)	55 lbs/day
VOC	75 lbs/day	55 lbs/day
PM_{10}	150 lbs/day	150 lbs/day
$PM_{2.5}$	55 lbs/day	55 lbs/day
SO_x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Lead	3 lbs/day	3 lbs/day
Toxic Air Contaminants (TAC) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Hazard Index ≥ 1.0 (Proposed Project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants		
NO_2 1-hour average annual average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm/339 µg/m^3 (State) 0.03 ppm/57 µg/m^3 (State)	
PM_{10} 24-hour average Annual geometric mean	 10.4 µg/m^3 (construction) and 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	 10.4 µg/m^3 (construction) and 2.5 µg/m^3 (operation)	
Sulfate 24-hour average	 1 µg/m^3	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm/23 milligrams per cubic meter (mg/m^3) (State) 9.0 ppm/10 mg/m^3 (State/Federal)	

Source: SCAQMD, 2009b

4.3.3 Applicant Proposed Measures

The Applicant proposes to implement air-quality related APMs to minimize air quality impacts associated with construction of the Proposed Project. The impact analysis assumes that the applicable APMs as listed below would be implemented during construction of the Proposed Project.

APM-AQ-1: Equipment engines shall be maintained in good condition and in proper tune as per manufacturers' specifications.

APM-AQ-2: Efficiently schedule staff and daily construction activities to minimize the use of unnecessary/duplicate equipment when possible.

APM-AQ-3: The area disturbed by clearing, grading, earth moving, or excavation operations shall be minimized to prevent excessive amounts of dust.

APM-AQ-4: Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably reclaimed, if available) should penetrate sufficiently to minimize fugitive dust during grading activities.

APM-AQ-5: Signs shall be posted on the Plant Station along designated travel routes limiting traffic to 15 miles per hour or less.

APM-AQ-6: During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site.

APM-AQ-7: Paved road surfaces shall use vacuum sweeping and/or water flushing to remove buildup of loose material to control dust emissions from travel on paved access roads (including adjacent public streets impacted by construction activities) and paved parking areas.

4.3.4 Environmental Impact Analysis

The Proposed Project-generated construction and operational emissions were compared with the air quality significance thresholds established by the SCAQMD to determine if significant adverse impacts could occur. These screening thresholds assist in the implementation of the AQMP's goal of bringing the basin into compliance with Federal and State ambient air quality standards by identifying which projects would result in significant levels of air pollution. The annual GHG emissions during operation and construction are summed and compared to the interim CEQA GHG significance thresholds recently adopted by the SCAQMD for industrial projects. Once CARB approves statewide GHG thresholds, the SCAQMD thresholds may be revised. The Proposed Project emissions and their impact significance are discussed in detail below. Using preliminary construction schedule information, this analysis assumes that many project components will occur on concurrent schedules. It should be noted that as construction schedules are finalized, actual construction emissions are expected to be lower than presented in the following analysis.

Because overall air emissions from operations of the Plant Station are considerably reduced due to the Proposed Project, including toxic air pollutants (TAC) emissions, and the primary emissions increase is from short-term temporary construction activities, a health risk assessment for the Proposed Project was not conducted.

4.3.4.1 Criteria Pollutant Emissions

Proposed Project Construction

Emissions during the construction phase of the Proposed Project include emissions from vehicle and equipment exhaust and fugitive dust generated from material handling. The main pollutants emitted during construction include criteria pollutants such as CO, VOC, NO_x, SO_2, PM_{10}, and $PM_{2.5}$. Fugitive dust emissions from soil disturbance and material handling activities also contribute to PM_{10} and $PM_{2.5}$ emissions. Paving roads with asphalt during construction will also generate VOC emissions when the asphalt cures.

Decommissioning and demolition of the existing TDC's has not been included in this analysis. The TDC's must remain in place for at least one field cycle after the new compressors have been installed to verify operating consistency and reliability of the proposed Central Compressor Station and therefore would not occur concurrent to any construction associated with installation of the Proposed Project. Therefore, emissions associated with decommissioning and removal is not part of the Proposed Project analysis.

The air pollutant emissions during construction and operation of the Proposed Project were estimated based on the construction data provided in Chapter 3.0 Project Description. Emission factors for off-road equipment and on-road vehicles obtained from the SCAQMD web site (SCAQMD, 2009c) were used to estimate construction criteria pollutant emissions. Though the construction activities span from 2010 through 2012, emissions factors for calendar year 2010 were used as the 2010 emission factors are higher than the factors for the two later years. Fugitive PM_{10} and $PM_{2.5}$ emissions from material handling were calculated using emission factors from the USEPA's Compilation of Air Pollutant Emission Factors (USEPA, 2009). VOC emissions from asphaltic road paving were calculated using an emission factor from the URBEMIS 2007 User's Guide (Jones & Stokes, 2007). The Proponent proposes to pave all access roads within the construction zones; thus unpaved road fugitive dust emissions will not be generated during construction of the Proposed Project.

Daily emissions were calculated for each construction activity detailed in Chapter 3 Project Description. The proposed Central Compressor Station construction is tentatively scheduled to commence in third quarter of 2010 and to be completed by the fourth quarter of 2012. The proposed SCE Natural Substation construction and all sub-transmission line construction activities are scheduled to commence by the second quarter of 2010 and to end by the second quarter of 2012. The potential construction phases that could occur concurrently were identified based on this tentative schedule, and daily emissions from these concurrent activities were then combined in the following six scenarios. As construction schedules are finalized, actual construction emissions are expected to be lower than presented in the following analysis. Emissions would be lower as a result of a longer timeframe with less construction activities occurring on the same day.

Scenarios 1 through 6 represent worst-case daily scenarios based on the overlap of schedules during the Proposed Project.

- Scenario 1: SoCalGas' guard house and office trailer relocation, proposed SCE Natural Substation survey, marshalling yard preparation, right of way clearing, sub-transmission line survey, sub-transmission line roadway;

- Scenario 2: Proposed Central Compressor Station survey; SCE Natural Substation survey, sub-transmission line survey, sub-transmission line roadway, sub-transmission pole framing and setting, TSP footing installation, line assembly, line restoration;

- Scenario 3: Proposed Central Compressor Station site clearing and preparation; substation civil and fencing; sub-transmission guard structure installation, sub-transmission survey, roadway, pole framing and setting, TSP footing installation, line assembly;

- Scenario 4: Proposed Central Compressor Station civil; substation MEER, electrical, wiring, transformer installation, testing, maintenance, paving and landscaping; all sub-transmission line construction activities;

- Scenario 5: Proposed Central Compressor Station mechanical and electrical; substation MEER, electrical, wiring, transformer installation, testing, maintenance, paving and landscaping; all sub-transmission line, pole removal and installation construction activities;

- Scenario 6: Proposed Central Compressor Station paving, PPL installation, fencing and landscaping, sub-transmission guard structure removal, 66 kV reconductoring ; fiber optic/telecommunications installation.

The highest daily emissions for each pollutant among the six scenarios were then identified to determine the peak daily emissions of each pollutant. Daily construction emissions calculated for each scenario (combination of concurrent activities) and peak daily construction emissions are summarized in Table 4.3-5 and compared with the SCAQMD air quality significance thresholds for construction.

As can be seen from the table, unmitigated peak daily criteria pollutant emissions for all pollutants except NO_x are below the established SCAQMD CEQA significance thresholds for construction. Unmitigated peak daily NO_x emissions from the Proposed Project exceed the construction NO_x emissions significance threshold of 100 lbs/day. Detailed emission calculations are presented in Appendix B.1.

Table 4.3-5 Peak Daily Construction Emissions

Scenario[1]	VOC (lb/day)	CO (lb/day)	NO_x (lb/day)	SO_x (lb/day)	PM_{10} (lb/day)	$PM_{2.5}$ (lb/day)
1	43.00	78.35	490.11	10.80	24.88	8.82
2	69.31	129.30	492.42	5.09	46.65	17.03
3	68.42	174.60	425.98	3.62	28.87	12.52
4	70.34	197.48	492.96	4.99	36.97	15.84
5	73.55	226.98	454.30	3.77	30.80	15.47
6	38.59	58.14	192.86	1.98	14.85	4.86
Peak Daily	**73.55**	**226.98**	**492.96**	**10.80**	**46.65**	**17.03**

SCAQMD Threshold	75	550	100	150	150	55
Exceed Threshold?	**NO**	**NO**	**YES**	**NO**	**NO**	**NO**

[1] Emissions were calculated for the six scenarios discussed above. Each scenario includes a combination of construction activities that could occur concurrently during the two-year construction period.

The construction NOx emission will be mitigated by purchasing Regional Clean Air Incentive Market (RECLAIM) Trading Credits (RTCs) for every pound of NOx emissions in excess of the threshold. The total amount of NOx RTCs that will need to be purchased will be calculated when the construction schedule and operating conditions are finalized. With this mitigation for NOx emissions, mitigated emissions during the construction of the Proposed Project will not exceed any construction thresholds for criteria pollutants established by the SCAQMD and thus will not cause a significant impact. The Proponent will need to purchase and surrender the required RTCs to the SCAQMD prior to the start of construction. Additionally, the Proponent will also be required to track actual daily emissions during construction according to a mitigation monitoring plan, which will require maintaining records of equipment and vehicle usage.

Proposed Project Operation

Operational emissions associated with the Proposed Project would be comprised of mobile source exhaust and entrained road dust emissions from employee commuting for regular maintenance checks at the Proposed SCE Natural Substation. As described in Chapter 3 Project Description, the Proposed SCE Natural Substation will be unmanned and will have approximately three to four visits for maintenance every month. The proposed Central Compressor Station replaces the existing natural gas driven jet turbines with VFD compressors. Thus, the operation of the proposed Central Compressor Station will not include any on-site combustion sources. Further, the proposed Central Compressor Station site operation will not increase the existing on-site employee base; thus, no vehicular emission increases are anticipated. Table 4.3-6 presents the peak daily Proposed Project operational emissions.

Table 4.3-6 Peak Daily Operational Emissions

Source	Daily Mass Emissions[2]					
	Reactive Organic Gases (ROG)	**CO (lbs/day)**	**NO_X (lbs/day)**	**SO_X (lbs/day)**	**PM_{10} (lbs/day)**	**$PM_{2.5}$ (lbs/day)**
Emission Factor (lb/mile)[1]	9.140E-04	8.263E-03	9.181E-04	1.077E-05	8.698E-05	5.478E-05
Vehicle Exhaust	0.22	1.98	0.22	0.00	0.02	0.01
Vehicle Fugitive	--	--	--	--	0.31	0.00
Total	**0.22**	**1.98**	**0.22**	**0.00**	**0.33**	**0.01**

[1] Emission factors in lb/mile from SCAQMD CEQA Air Quality Guidance Hand Book, Onroad EMFAC 2007 Emission Factors; PM10 and PM2.5 includes exhaust + tire + break wear emissions.

[2] Emissions [lb/day] = Emission factor [lb/mi] x Distance per vehicle [lb/day] x Number

The operation of the Proposed Project provides a benefit to air quality from the decommissioning of the jet turbines at the existing compressor site, as can be seen from the emission decreases presented in Table 4.3-7.

Table 4.3-7 Emissions Decrease from the Removal of the Existing Jet Turbines

Source	Average Daily Fuel Use (MMcf/day)[1]	Daily Mass Emissions (lbs/day)				
		ROG	CO	NO_x	PM_{10}	SO_x
Emission Factor (lb/MMcf)[2]		5.50	84.00	--	7.60	0.60
D-14	1.38	7.59	115.98	358.56	881.46	0.83
D-15	1.26	6.94	106.04	348.08	805.91	0.76
D-16	1.32	7.28	111.16	362.97	844.85	0.79
Total Jet Turbine Emissions		**(27.32)**	**(417.19)**	**(1069.61)**	**(2539.82)**	**(2.98)**

[1] Average Daily Fuel Use calculated from Annual Actual Fuel Use from the Continual Emissions Monitoring Systems (CEMS) data for years 2007 and 2008. Average Annual Fuel Use for the two years was divided by 365 to calculate daily fuel use.

[2] Emission factors in lb/MMcf from AP42 - Table 1.4-1 and Table 1.4-2 for all pollutants except NOx. NOx emissions are calculated from CEMS data during 2007 and 2008. Note* SoCalGas is required to source test for NOx, AP-42 factors used where source test data not available

Table 4.3-8 presents the net emissions changes during operation of the Proposed Project. Since operation of the Proposed Project will lead to a decrease in criteria pollutant emissions, emissions during operation will be less than the SCAQMD CEQA significance thresholds.

Table 4.3-8 Net Overall Change in Daily Operational Mass Emissions

Source	Daily Mass Emissions (lbs/day)					
	ROG	CO	NOx	SOx	PM10	PM2.5
Vehicle Emissions	0.22	1.98	0.22	0.00	0.33	0.01
Decrease from Removal of Turbines	(27.32)	(417.19)	(1069.61)	(2.98)	(37.75)	(37.75)
Net Total	**(27.10)**	**(415.20)**	**(1069.39)**	**(2.98)**	**(37.42)**	**(37.73)**
Significance Threshold	*55*	*550*	*55*	*150*	*150*	*55*
Significant? (Yes/No)	**No**	**No**	**No**	**No**	**No**	**No**

$PM_{2.5}$ emissions assumed equal to PM_{10} emissions for the jet turbines

4.3.4.2 Greenhouse Gas Emissions

GHG emissions during construction of the Proposed Project will be generated by construction equipment and motor vehicle fuel combustion. GHG emissions from construction equipment and mobile vehicle exhaust were calculated using off-road and on-road emission factors from the SCAQMD (SCAQMD, 2009c). GHG emissions during operation of the Proposed Project will be generated by employee commuting to the proposed SCE Natural Substation and the generation of electricity to power by the new

motor driven compressors. GHG emissions from the generation of electricity used by the compressors was estimated using the maximum annual electricity usage by the three new compressors (16MW each at 8760 hours per year) and emission factors for electricity usage from the California Climate Action Registry (CCAR, 2009). GHG emissions during the Proposed Project operations will also include leakage of sulfur hexafluoride (SF_6), an insulating gas used in the new circuit breakers that will be installed at the substations. The Proposed Project will install seven new 66 kV circuit breakers and six 12 kV circuit breakers at the proposed SCE Natural Substation, and four new 66 kV circuit breakers at the existing San Fernando Substation. The total annual SF_6 emissions are estimated from the number of circuit breakers to be installed, the amount of SF_6 in each circuit breaker, and the anticipated leakage rate.

Table 4.3-9 presents the construction GHG emissions and the net operational GHG emissions, and compares the net GHG emission against the SCAQMD adopted interim significance threshold of 10,000 metric tons (MT) of carbon dioxide (CO_2) equivalent (CO_2e) per year. A project is considered to have an insignificant impact if the total annual GHG emissions from construction (amortized over 30 years) and operation are less than the interim significance thresholds. Net operational emissions include the decrease in GHG emissions from the removal of the existing natural gas jet turbines. As can be seen from the table, the sum of the total construction GHG emissions amortized over 30 years and the operational GHG emissions are below the adopted threshold. Detailed GHG emission calculations are provided in Appendix B.1.

Table 4.3-9 Greenhouse Gas Emissions Summary

Source	CO_2e
Construction	
Equipment Exhaust (MT)	4,518
Motor Vehicle Exhaust (MT)	1,663
Total Construction Emissions (MT)	***6,181***
Total Construction Emissions Amortized over 30 years (MT/year)	***206***
Operation	
SF_6 Leakage (MT/year)	54
Motor Vehicle Exhaust (MT/year)	4
Compressor Electricity Use (MT/year)	138,709
Potential GHG Emissions from Current Project (MT/year)	***138,766***
Jet Turbine D14 Operation (MT/year)	(69,789)
Jet Turbine D15 Operation (MT/year)	(69,789)
Jet Turbine D16 Operation (MT/year)	(69,789)
Decrease in GHG due to Removal of Turbines (MT/year)	***(209,368)***
Net Operational GHG Emissions (MT/year)	***(70,395)***
Total Project GHG Emissions (MT/year)	**(70,189)**
SCAQMD Interim Threshold (MT/year)	10,000

Table 4.3-9 Greenhouse Gas Emissions Summary

Source	CO_2e
Significant (Yes/No)?	**NO**

Note: GHG emissions from the new electric driven compressors and existing jet turbines are based on emissions reported in the Annual Emissions Report.

Voluntary Greenhouse Gas Measures

SCE voluntarily reports SF_6 gas emissions and has developed measures to monitor and prevent leakage. SCE currently tracks SF_6 gas leakage on a system-wide basis. SCE $SF_6$6 Gas Management Guidelines require proper documentation and control of SF_6 gas inventories, whether in equipment or in cylinders. Inventories are documented on both a quarterly and a yearly basis. SCE assumes that any SF_6 gas that is purchased and not used to fill new equipment is needed to replace SF_6 gas that has inadvertently leaked from equipment already in service. This allows SCE to track and manage SF6 gas emissions.

SCE currently voluntarily reports these emissions to the California Climate Action Registry, which was created by the California legislature to help companies track and reduce greenhouse gas emissions. SCE has taken proactive steps in the effort to minimize greenhouse gas emissions since 1997. In 1997, SCE established an SF_6 Gas Resource Team to address issues pertaining to the environmental impacts of SF_6. The team developed the Gas Management Guidelines that allow for rapid location and repair of equipment leaking SF_6 gas. In addition, in 2001, SCE's parent organization, Edison International, joined the US Environmental Protection Agency's voluntary SF_6 gas management program, committing SCE to join the national effort to minimize emissions of this greenhouse gas. Importantly, SCE's SF_6 emissions in 2006 were 41 percent less than in 1999, while the inventory of equipment containing SF_6 gas actually increased by 27percent during the same time period.

SCE has made a significant investment in not only improving its SF_6 gas management practices but also purchasing state-of-the-art gas handling equipment that minimizes SF_6 leakage. The new equipment has improved sealing designs that virtually eliminate possible sources of leakage. SCE has also addressed SF_6 leakage on older equipment by performing repairs and replacing antiquated equipment through its infrastructure replacement program.

It is expected that the Natural Substation SCE and the other substation modifications required as part of the Proposed Project involving circuit breaker replacement would result in minimal amount of SF_6 leakage as a result of the state-of-the-art equipment and SCE's SF_6 gas management practices. Pursuant to its existing practices, SCE would be reducing potential greenhouse gas impacts due to the SCE substation components of the Proposed Project to the greatest practicable.

4.3.4.3 Significance Evaluation

The potential impact to hazards from construction and operation of the Proposed Project was evaluated using the stated CEQA significance criteria and is presented in this section. For the purpose of presenting potential hazards resource impacts, CEQA criteria were evaluated and are discussed together for construction and operations.

Would the Proposed Project conflict with or obstruct implementation of the applicable air quality plan?

The Proposed Project will be consistent with the SCAQMD 2007 AQMP and will not conflict with or obstruct implementation of the AQMP. The SCAB has a history of recorded air quality violations and is an area where both Federal and State ambient air quality standards are exceeded. Because of the violations of the CAAQS, the CCAA requires triennial preparation of an AQMP. The AQMP analyzes air quality on a regional level and identifies region-wide attenuation methods to achieve the air quality standards. The most recently adopted plan for the SCAB is the 2007 AQMP (SCAQMD, 2007). The purpose of the 2007 AQMP is to establish a comprehensive program to lead the region into compliance with Federal $PM_{2.5}$ air quality standards by 2015, and Federal 8-hour ozone standard by 2024, while making expeditious progress toward attainment of the State standards. The 2007 AQMP proposes potential attainment demonstration of the Federal $PM_{2.5}$ standard by 2015 through a more focused control of SO_x, directly-emitted $PM_{2.5}$, and NO_x supplemented with VOC emission reductions. The Federal 8-hour ozone control strategy builds upon the $PM_{2.5}$ strategy, augmented with additional VOC reductions to meet the standard by 2024. The 2007 AQMP also outlines additional efforts through localized programs to ensure compliance with the now revoked Federal annual PM_{10} standard and also assist in the on-going compliance of the retained 24-hour PM_{10} standard. Currently, the SCAB meets the 24-hour average federal PM_{10} standard at all the monitoring stations and is expected to continue to meet the standard through 2015. However, the SCAB did not meet the now revoked PM_{10} annual standard at one monitoring station (Riverside-Rubidoux) in the Basin in 2006, the attainment target year for PM_{10}. The 2007 AQMP shows the Basin to be in compliance with Federal standards by 2024. However, the Basin will require additional time beyond 2024 to meet the State ozone, $PM_{2.5}$ and PM_{10} standards.

The 2007 AQMP contains measures based on current technology assessments. Because the AQMP is geared toward reducing long-term operational emissions and the Proposed Project will cause a net decrease in criteria pollutant emissions, the Proposed Project will help achieve and not conflict with or obstruct implementation of the applicable Air Quality Plan. Therefore this impact would be less than significant. No mitigation measures would be required.

Would the Proposed Project Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The Proposed Project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Proposed Project is located in a non-attainment area, an area that frequently exceeds national ambient air quality standards. To determine whether the Proposed Project would violate any air quality standards or contribute substantially to an existing or projected air quality violation, a worst-case scenario approach was taken to ensure that all potential air quality impacts are assessed. As such, emissions occurring during peak construction activities were quantified and used to determine air quality impacts as discussed in Section 4.3.5. In addition, a localized significance threshold analysis was also conducted to evaluate the potential localized impacts of the construction and operational activities. The localized significance threshold methodology requires an analysis regarding whether or not emissions of specified criteria pollutants would cause ambient air quality levels to exceed established thresholds at the nearest off-site receptor.

The peak daily construction and operational emissions are presented in Table 4.3-5 and Table 4.3-6, respectively. The comparison of the peak daily construction emissions with the SCAQMD significance

thresholds show that all pollutant emissions are below the thresholds with the exception of NO_x. Thus, without mitigation the Project's NOx emissions will cause a significant adverse impact during construction.

Tables 4.3-10 and 4.3-11 present the LST values and the results of the LST analysis. The LST analysis was conducted for the Proposed Central Compressor Station and the proposed SCE Natural Substation individually to assess their impact on local air quality at nearby off-site receptors. Most of the proposed construction, including the proposed Central Compressor Station site and proposed SCE Natural Substation are away from residential or community zones, and thus a buffer zone exists for the residential population near the Proposed Project area. The nearest sensitive receptor is more than 900 meters to the south of the Proposed Central Compressor Station and the proposed SCE Natural Substation sites. Table 4.3-10, presents the allowable LST emissions, which represent the threshold for the amount of air pollutants that may potentially create localized significance air quality impacts. Based on a 2-acre area each for the proposed Central Compressor Station site and the proposed SCE Natural Substation site and the nearest receptor distance, and using the LST values the Proposed Project will not have a potential for adverse localized air quality impacts at nearby receptor locations (see Table 4.3-11).

Table 4.3-10 SCAQMD Localized Significance Threshold (LST) Values

	Allowable emissions (lb/day) as a function of receptor distance from Site Boundary									
Pollutant	**1 Acre**					**2 Acre**				
Receptor Distance (meters)	**25**	**50**	**100**	**200**	**500**	**25**	**50**	**100**	**200**	**500**
CO	590	879	1294	2500	8174	877	1256	1787	3108	8933
NOx	106	107	124	161	254	152	148	160	190	271
PM_{10} Construction	4	12	25	51	131	6	19	32	59	139
PM_{10} Operation	1	3	6	13	32	2	5	8	15	34
$PM_{2.5}$ Construction	3	4	7	18	74	4	5	9	20	80
$PM_{2.5}$ Operation	1	1	2	5	18	1	2	2	5	20

Table 4.3-11 represents peak daily emissions from both construction and operation during the Proposed Project. Operation of the proposed Central Compressor Station will result in a net benefit in peak daily emissions, as represented in Table 4.3-11. Operation of the proposed SCE Natural Substation will result in minimal emissions due to vehicle emissions from workers travelling to and from the substation.

Table 4.3-11 LST Analysis for proposed Central Compressor Station and proposed SCE Natural Substation

	CO	**NOx**	**PM_{10}**	**$PM_{2.5}$**
Compressor Site				
Peak Daily Construction Emissions	107.26	93.18	9.64	4.52
Peak Daily Operational Emissions	1.98	0.22	0.33	0.01
Substation Site				
Peak Daily Construction Emissions	32.40	47.35	15.64	4.52
Peak Daily Operational Emissions	0.00	0.00	0.00	0.00

Table 4.3-11 LST Analysis for proposed Central Compressor Station and proposed SCE Natural Substation

	CO	NOx	PM_{10}	$PM_{2.5}$
Localized Significance Threshold Values for Source Receptor Area 13				
NOx and CO LST (Construction & Operation)	***8933***	***271***	**--**	**--**
PM10 and PM2.5 LST (Construction)	**--**	**--**	***139***	***80***
PM10 and PM2.5 LST (Operation)	**--**	**--**	***34***	***20***
Compressor Site Significant Impact (Yes/No)?	**NO**	**NO**	**NO**	**NO**
Substation Site Significant Impact (Yes/No)?	**NO**	**NO**	**NO**	**NO**

Note: Analysis conducted for a 2-acre site and for receptor distance of 500m

The construction of the Proposed Project will have a significant adverse unmitigated NOx impact. However, the Proponent proposes to offset this NOx emissions increase by the purchase of RECLAIM for every pound of NOx emissions in excess of the threshold during construction. The total amount NOx RTCs that will need to be purchased will be calculated when the construction schedule and operating conditions are finalized. With this mitigation for NOx emissions, the construction of the Proposed Project will not exceed any CEQA significance thresholds for criteria pollutants established by the SCAQMD and thus, will be a less than significant impact. The Proponent will need to purchase and surrender the required RTCs to the SCAQMD prior to the start of construction. Additionally, the Proponent will also be required to track actual daily emissions during construction according to a Mitigation Monitoring Plan, which will require maintaining records of equipment and vehicle usage.

Further, the Proposed Project will also implement all feasible APMs to reduce construction-related air quality impacts. The implementation of measures AQ-1 through AQ-4 discussed earlier will help further reduce NOx impacts to levels considered less than significant. Though PM_{10} and $PM_{2.5}$ emissions during construction do not exceed the established standards, the Proponent will implement fugitive dust control measures as recommended by the SCAQMD (Rule 403 and CEQA fugitive dust mitigation measures) and as detailed by APMs AQ-5 through AQ-07 to further reduce the fugitive dust impacts. Thus, with mitigation the Proposed Project would not be expected to violate any air quality standard nor contribute substantially to an existing or projected air quality violation.

Would the Proposed 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 (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?

Proposed Project construction and operations emissions will not result in a cumulatively considerable net increase of any criteria pollutant for which the Proposed Project region is non-attainment. The SCAB is a non-attainment area for ozone, $PM_{2.5}$, and PM_{10}. Projects that contribute to a significant cumulative increase in ozone or ozone precursors NO_x and ROG, $PM_{2.5}$, or PM_{10} are considered to be significant and require the consideration of mitigation measures. As shown is Table 4.3-6, the Proposed Project will not exceed the significance thresholds for any pollutant during operation. However, during construction, the peak daily NO_x emissions exceed the significance thresholds for NO_x, thus causing a potential significant impact. However, with the implementation of APMs (AQ-1 through AQ-3) for NO_x and the purchase of

RTCs to offset NO_x emissions, the mitigated NO_x emissions would be reduced to levels below the significance thresholds.

The SCAQMD established the significance thresholds in consideration of cumulative air pollution in the SCAB. Thus, projects that do not exceed these thresholds do not significantly contribute to cumulative air quality impacts. Since the Proposed Project would not exceed the established thresholds (with mitigation for NO_x), it is anticipated that the Proposed Project will not contribute to a cumulatively considerable net increase of any criteria pollutants for which the Proposed Project region is non-attainment. With the implementation of Proposed Project mitigation measures and BMPs (AQ-1 through AQ-7), impacts to air quality will be less than significant.

Would the Proposed Project expose sensitive receptors to substantial pollutant concentrations?

The Proposed Project will not cause expose sensitive receptors to substantial pollutant concentrations. The LST analysis discussed earlier (see Tables 4.3-10 and 4.3-11) shows that the Proposed Project construction and operation will not cause any significant impact to nearby receptors. Further, since construction emissions are temporary and generally occurring close to the Proposed Project and dispersing quickly, no significant impacts to public health are expected to occur from the construction of the project. Long-term operational emissions that can potentially have adverse health impacts on sensitive receptors are negligible because the only source of emissions would be from maintenance vehicle operations at the proposed SCE Natural Substation, approximately three or four times a month (Table 4.3-6).

The Proponent will implement feasible APMs to reduce construction related air quality impacts from NO_x and fugitive dust emissions. With the implementation of the proposed measures (AQ-1 through AQ-11), potential impacts to sensitive receptors would be expected to be less than significant during typical construction activities. Thus, impacts from construction and operation of the Proposed Project would be less than significant.

Would the Proposed Project create objectionable odors affecting a substantial number of people?

The Proposed Project will not cause objectionable odors. Construction and operation of the Proposed Project will not release any odorous substances. Some odors associated with the Proposed Project would result from construction equipment exhaust during construction activities, but these emissions would disperse very quickly in the open area. Given the short-term and temporary nature of construction activities, as well as the standard construction requirements imposed on the applicant, impacts associated with construction-generated odors would be less than significant. Thus, the Proposed Project will not create objectionable odors affecting a substantial number of people and is less than significant.

4.3.5 Mitigation Measures

The Proposed Project was determined to have **a less than significant impact with mitigation** on air quality resources. Peak daily emissions of nitrogen oxides (NOx) were determined to have a potentially significant air quality impact that could be mitigated to below a level of significance by applying existing NOx allocations (credits) to offset emission increases due to short-term construction exceedances. The SCAQMD has successfully allowed the use of credits to offset temporary emission increase on a year-by-year basis for mitigation pursuant to CEQA. Therefore, to offset short-term potential of NOx emissions impacts from construction activities the following air quality mitigation measure is proposed:

AQ-MM-01: Prior to construction, the Proponent will mitigate construction emissions of NOx by purchasing Regional Clean Air Incentives Market (RECLAIM) Trading Credits (RTCs) for every pound of NOx emissions in excess of the construction threshold of 100 lbs/day. The Proponent will be required to track actual daily emissions during construction according to a mitigation monitoring plan, which will require maintaining records of equipment and vehicle usage.

No other mitigation measures are required. The Proposed Project will also implement all feasible APMs for NOx (AQ-1 through AQ-4) and fugitive dust (AQ-5 through AQ-7) during construction to lessen the air quality impacts. With the proposed mitigation, air quality impacts are determined to be less than significant.

4.3.6 References

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