

2.3 Air Quality

This section summarizes information from the *Air Quality/Global Climate Change Analysis* (RBF 2012) prepared for the proposed Project, included as Appendix C of this SEIR, and evaluates existing conditions for air quality plans, air quality attainment in the County, hazardous air pollutants, and odors relative to the Project areas addressed in this SEIR, as well as the potential effects that implementation of the proposed Project may have on these conditions.

2.3.1 Existing Conditions

The adequacy of the existing conditions information for this environmental topic as provided in the General Plan Update EIR has been confirmed through re-checking of the references pertaining to this section in Chapter 5.0 of the General Plan Update EIR, including all relevant listed persons, plans, policies, and websites. In addition, this information has been confirmed through consultation/interviews with appropriate County or other agency staff, as available, that were involved in the preparation/review of this section of the General Plan Update EIR and/or supporting technical studies; all of these sources are listed in Chapter 6.0 of the General Plan Update EIR. The existing conditions information for this environmental topic as provided in the General Plan Update Program EIR applies equally to the Project areas addressed in this SEIR, and is therefore not repeated here.

2.3.2 Regulatory Framework

The regulatory framework discussion in the General Plan Update EIR as pertains to air quality has not changed since adoption of the General Plan Update in August 2011. Therefore, the regulatory framework applies equally to the Project areas addressed in this SEIR, and is therefore not repeated here.

2.3.3 Analysis of Project Effects and Cumulative Impacts

For the cumulative impact analyses, the geographic scope for each of the issues below would be the same as described and evaluated in the General Plan Update EIR, and as updated in Section 1.9 of this SEIR (Cumulative Project Assessment Overview).

2.3.3.1 *Air Quality Plans*

This section describes potential direct and cumulative impacts associated with air quality plans as pertains to the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, and the County of San Diego Guidelines for Determining Significance, Air Quality, the proposed Project would have a significant impact if it would conflict with or obstruct implementation of the Regional Air Quality Strategies (RAQS), applicable portions of the State Implementation Plan (SIP), and/or any local air quality plans.

Impact Analysis

The General Plan Update Program EIR determined that buildout under the General Plan Update would result in less than significant direct and cumulative impacts related to consistency with air quality plans due to the implementation of a combination of federal, State and local regulations and existing County regulatory processes.

Similar direct and cumulative impacts related to consistency with air quality plans would occur with the proposed Project. As noted in the Project's *Air Quality/Global Climate Change Analysis* (RBF 2012), the proposed Project would result in an increase in development within the unincorporated County lands resulting in corresponding increases in air pollutant emissions; however, such future development would be required to demonstrate compliance with the strategies and measures adopted as part of the RAQS and SIP during the County's environmental review process for each development application, as well as with the requirements of the County and/or San Diego Air Pollution Control District (APCD) to reduce emissions of ozone precursors and particulate matter. Because the proposed Project is also required to comply with these same programs, future development of the Project areas addressed in this SEIR would also not result in significant direct and cumulative impacts related to the consistency with air quality plans. Therefore, mitigation would not be required.

2.3.3.2 *Air Quality Violations*

This section describes potential direct and cumulative impacts associated with the air quality violations due to the exceedance of established air pollutant thresholds as pertains to the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, and the County of San Diego Guidelines for Determining Significance, Air Quality, the proposed Project would have a significant impact if it would exceed the quantitative screening-level thresholds (SLTs) for the attainment-criteria pollutants (nitrogen dioxide [NO₂], sulfur dioxide [SO₂], and carbon monoxide [CO]), and for nonattainment-criteria pollutants (ozone [O₃] precursors and particulate matter). Specifically, the proposed Project would result in a significant impact if it would result in:

- a. Emissions that exceed 250 pounds per day of oxides of nitrogen [NO_x], or 75 pounds per day of volatile organic compounds [VOCs];

SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

- b. Emissions of CO that, when totaled with the ambient concentrations, will exceed a 1-hour concentration of 20 parts per million (ppm) or an 8-hour average of 9 ppm, or exceed 550 pounds per day of CO, or 100 pounds per year of CO;
- c. Emissions of PM_{2.5} that will exceed 55 pounds per day; or,
- d. Emissions of PM₁₀ that exceed 100 pounds per day and increase the ambient PM₁₀ concentration by 5 micrograms per cubic meter (µg/m³) or greater at the maximum exposed individual.

Impact Analysis

The General Plan Update Program EIR determined that buildout under the General Plan would result in potentially significant direct and cumulative impacts related to air quality violations. These impacts would be reduced through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and, specific mitigation measures/implementation programs identified in the General Plan Update Program EIR; however, even with these programs in place, the impacts would not be reduced to below a level of significance because future development would exceed established quantitative SLTs.

Future development under the proposed Project would generate short-term emissions associated with construction activities within the unincorporated County lands, including emissions from off-road equipment, vehicles, fugitive dust from surface disturbance, and architectural coatings. Since construction emissions for individual projects would be temporary, and the total duration would vary from project to project, such emissions were therefore not modeled. Nevertheless, such emissions would be cumulative in nature, as future construction activities for several projects implementing the GPA could occur simultaneously. As such, the proposed Project would result in a potentially significant cumulative air quality impact with respect to construction-related emissions.

Similar direct and cumulative impacts related to air quality violations would occur with the proposed Project. As noted in the Project's *Air Quality/Global Climate Change Analysis* (RBF 2012), future development would result in air quality violations due to area-wide and mobile source emissions that would exceed established SLTs for VOCs, NO_x, CO, and PM_{2.5}; refer to Table 2.3-1, Area-Wide and Mobile Source Emissions for the Proposed Project. Such potentially significant impacts resulting from implementation of the proposed Project would be reduced by the same regulations, implementation programs (General Plan Update goals/policies) and mitigation measures from the General Plan Update EIR and repeated in Section 2.3.4.7 (Mitigation for Air Quality) below; however, even with these programs in place, the impacts would not be reduced to below a level of significance due to the infeasibility of mitigation measures as discussed in Section 2.3.4.7 below. As such, implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to air quality violations.

2.3.3.3 Non-Attainment Criteria Pollutants

This section describes potential direct and cumulative impacts associated with the net increase of any non-attainment criteria pollutants as pertains to the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, and the County of San Diego Guidelines for Determining Significance, Air Quality, the proposed Project would have a significant impact if it would result in a net increase of any criteria pollutant for which the San Diego Air Basin (SDAB) is non-attainment under applicable federal or State Ambient Air Quality Standards (AAQS) (including emissions which exceed the SLTs for O₃ precursors listed in Table 2.3-1).

Impact Analysis

The General Plan Update Program EIR determined that buildout under the General Plan would result in potentially significant direct and cumulative impacts related to non-attainment criteria air pollutant emissions associated with PM₁₀, PM_{2.5}, and O₃ precursors (VOC and NO_x). These impacts would be reduced through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and, specific mitigation measures/ implementation programs identified in the General Plan Update Program EIR; however, even with these programs in place, the impacts would not be reduced to below a level of significance because future development would exceed established SLTs and thereby result in a net cumulatively considerable contribution.

Similar direct and cumulative impacts related to air quality violations would occur with the proposed Project. As noted in the Project's *Air Quality/Global Climate Change Analysis* (RBF 2012), future development would result in area-wide and mobile source emissions that would exceed established SLTs for the following non-attainment criteria pollutants: VOCs, NO_x PM_{2.5}. Such potentially significant impacts resulting from implementation of the proposed Project would be reduced by the same regulations, implementation programs (General Plan Update goals/policies) and mitigation measures from the General Plan Update EIR and repeated in Section 2.3.4.7 (Mitigation for Air Quality) below; however, even with these programs in place, the impacts would not be reduced to below a level of significance due to the infeasibility of mitigation measures as discussed in Section 2.3.4.7 below. As such, implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to non-attainment criteria pollutants.

2.3.3.4 Sensitive Receptors

This section describes potential direct and cumulative impacts sensitive receptors as pertains to the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, and the County of San Diego Guidelines for Determining Significance, Air Quality, the proposed Project would have a significant impact if it would directly impact a sensitive receptor and result in a cancer risk of greater than 1 in one million without implementation of Toxics Best Available Control Technology (T-BACT), 10 in one million with implementation of T-BACT, or health hazard index of one or more, consistent with the APCD's Rule 1210 requirements for stationary sources.

Impact Analysis

The General Plan Update Program EIR determined that buildout under the General Plan would result in potentially significant direct and cumulative impacts to sensitive receptors. These impacts would be reduced through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; the adopted General Plan goals and policies; and, specific mitigation measures/ implementation programs identified in the General Plan Update Program EIR; however, even with these programs in place, the impacts would not be reduced to below a level of significance because future development would result in increased emissions of diesel particulate matter to an existing impacted air quality basin (SDAB).

Similar direct and cumulative impacts related to sensitive receptors would occur with the proposed Project. As noted in the Project's *Air Quality/Global Climate Change Analysis* (RBF 2012), future development would result in increased vehicle trips and corresponding increases in emissions of diesel particulate matter. Such potentially significant impacts resulting from implementation of the proposed Project would be reduced by the same regulations, implementation programs (General Plan Update goals/policies) and mitigation measures from the General Plan Update EIR and repeated in Section 2.3.4.7 (Mitigation for Air Quality) below; however, even with these programs in place, the impacts would not be reduced to below a level of significance due to the infeasibility of mitigation measures as discussed in Section 2.3.4.4 below. As such, implementation of the proposed Project would result in significant and unavoidable direct and cumulative impacts related to sensitive receptors.

2.3.3.5 Odors

This section describes potential direct and cumulative impacts associated with objectionable odors as pertains to the Project areas addressed in this SEIR.

Guidelines for the Determination of Significance

Based on Appendix G of the CEQA Guidelines, and the County of San Diego Guidelines for Determining Significance, Air Quality, future development under the proposed Project would have a significant impact if it would result in the emission of objectionable odors to a considerable number of persons.

Analysis

The General Plan Update Program EIR determined that buildout under the General Plan would result in less than significant direct and cumulative impacts related to the production of objectionable odors due to the implementation of a combination of federal, State and local regulations; existing County regulatory processes; and, adopted General Plan goals and policies. Because the proposed Project is also required to comply with these same programs, future development of the Project areas addressed in this SEIR would also not result in significant direct and cumulative impacts related to objectionable odors. Therefore, mitigation would not be required.

2.3.4 Mitigation for Air Quality

2.3.4.1 Air Quality Plans

The Project would not result in significant direct and cumulative impacts related to consistency with air quality plans through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; and, adopted General Plan goals and policies. Therefore, mitigation is not necessary.

2.3.4.2 Air Quality Violations

Direct and cumulative impacts associated with air quality violations would be reduced with implementation of the same applicable General Plan Update policies and mitigation measures as identified in the General Plan Update Program EIR, and repeated below, although these impacts would not be reduced to below a level of significance because the County determined that implementation of the additional measures listed below would be infeasible for the following reasons:

- Require all construction activities to use equipment that is California Air Resources Board (CARB) certified Tier 3 or better. This measure could not be accomplished because it would require all construction contractors working within the County to turn over their existing equipment which remains usable, and would require a more stringent emissions standard than implemented by CARB. The CARB is currently implementing regulations that will require turnover of equipment to meet its regulatory standards for large vehicle fleets. The measure would limit which construction contractors would be allowed to work within the County and could result in undue costs to project applicants.
- Prohibit new development that would result in emissions from new vehicle trips that would exceed the screening level thresholds. This measure would result in restrictions on future development in areas identified for increased growth under the proposed Project because, with current vehicle emissions standards, it would severely limit development densities. This would conflict with the project's objective to support a reasonable share of projected regional population growth, because it would prohibit new development in the

SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

unincorporated County. In addition, if vehicle trips exceed screening level thresholds but a project is not proposing densities greater than what was expected by the general plan, those trips are accounted for in the RAQS and does not automatically mean the actual ambient air quality standards will be exceeded.

- Prohibit use of architectural coatings or other building materials that may result in emissions of VOCs. Only zero-VOC coatings and building materials would be allowed for use in the County. This measure would result in undue hardship on the entitlement process because most architectural coatings contain some VOCs and the measure would restrict the types of coatings that could be used to a limited type and number of formulations that may not be feasible for all applications. The VOC content in architectural coatings is regulated by the APCD, which has established a phase-in schedule for reduction of VOCs in accordance with the SIP requirements. The measure would also require the County to monitor and enforce the use of architectural coatings at all construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.
- Encourage the construction of new development that would result in a reduction of vehicle trips because developers are able to demonstrate that they tie into an existing or planned alternative transportation network, such as transit (bus, train, trolley), bicycle network, walkways, and trails. This measure would result in restrictions on future development in areas identified for increased growth under the proposed Project because not all areas of planned growth have an existing or planned alternative transportation network that new development could tie into. Implementation of this mitigation measure would conflict with the Project objective to reinforce the vitality, local economy and individual character of existing communities by restricting future development to areas with existing alternative transportation networks, which excludes many rural areas.
- Require all applicants to provide on-site renewable energy systems, including solar, wind, geothermal, low-impact hydro power, biomass, and bio-gas. This measure would not be feasible because all applicants may not be able to provide renewable energy systems at all proposed locations. In addition, some energy systems may trigger additional regulatory requirements from the California Public Utilities Commission (CPUC) or California Energy Commission (CEC) that would make individual projects infeasible to construct. Implementation of this measure would potentially increase infrastructure costs, which would conflict with the Project objective to minimize public costs of infrastructure and services; however, in circumstances where feasible, applicants will be encouraged to provide on-site renewable energy systems.
- Install vegetated roofs that cover at least 50 percent of roof area. This measure would be infeasible because residential and commercial buyers may find vegetated roofs to be undesirable, and it places the burden of developing the vegetated roof on the project

applicant. The measure may also add additional monitoring requirements on the County to verify that vegetated roofs are properly maintained.

- Provide a spur at nonresidential projects to use nearby rail for goods movement. This measure would not be feasible because it would depend on the rail system and the availability of rail transit to individual projects, most of which would not be located near railroad networks. Implementation of this measure would conflict with the Project objective to ensure that development accounts for physical constraints, since much of the unincorporated County has limited access to the existing rail system.
- Require the use of locally made building materials for construction projects. This measure would not be feasible because it would severely limit development projects, as some specialized building materials for projects may not be available locally. The measure would also require the County to monitor and enforce building material purchases at construction projects within its jurisdiction, which it does not have the funding or staffing available to accomplish.

Because the measures listed above have been found to be infeasible, impacts would remain significant and unavoidable.

General Plan Policies

Implementation of the following policies would reduce Project impacts associated with air quality violations, but not to below a level of significance for the reasons stated above:

COS-14.1 Land Use Development Form. Require that development be located and designed to reduce vehicular trips (and associated air pollution) by utilizing compact regional and community-level development patterns while maintaining community character.

COS-14.2 Villages and Rural Villages. Incorporate a mixture of uses within Villages and Rural Villages that encourage people to walk, bicycle, or use public transit to reduce air pollution and GHG emissions.

COS-14.8 Minimize Air Pollution. Minimize land use conflicts that expose people to significant amounts of air pollutants.

COS-14.9 Significant Producers of Air Pollutants. Require projects that generate potentially significant levels of air pollutants and/or GHGs such as quarries, landfill operations, or large land development projects to incorporate renewable energy, and the best available control technologies and practices into the project design.

COS-14.10 Low-Emission Construction Vehicles and Equipment. Require County contractors and encourage other developers to use low-emission construction vehicles and equipment to improve air quality and reduce GHG emissions.

COS-15.1 Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with “green building” programs that incorporate

techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants.

COS-15.3 Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified “green building” programs that demonstrate energy efficiency, energy conservation, and renewable technologies.

COS-15.4 Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.

COS-15.5 Energy Efficiency Audits. Encourage energy conservation and efficiency in existing development through energy efficiency audits and adoption of energy saving measures resulting from the audits.

COS-16.2 Single-Occupancy Vehicles. Support transportation management programs that reduce the use of single-occupancy vehicles.

COS-16.3 Low-Emissions Vehicles and Equipment. Require County operations and encourage private development to provide incentives (such as priority parking) for the use of low- and zero-emission vehicles and equipment to improve air quality and reduce GHG emissions. [Refer also to PolicyM-9.3 (Preferred Parking) in the Mobility Element.]

COS-20.3 Regional Collaboration. Coordinate air quality planning efforts with federal and State agencies, SANDAG, and other jurisdictions.

Mitigation Measures

Implementation of the following mitigation measures would reduce Project impacts associated with air quality violations, but not to below a level of significance for the reasons stated above:

Air-2.1 Provide incentives such as preferential parking for hybrids or alternatively fueled vehicles such as compressed natural gas (CNG) vehicles or hydrogen- or electric-powered vehicles. The County shall also establish programs for priority or free parking on County streets or in County parking lots for hybrids or alternatively fueled vehicles.

Air-2.2 Replace existing vehicles in the County fleet as needed with the cleanest vehicles commercially available that are cost-effective and meet vehicle use needs.

Air-2.3 Implement transportation fleet fueling standards to improve the number of alternatively fueled vehicles in the County fleet.

Air-2.4 Provide incentives to promote the siting or use of clean air technologies where feasible. These technologies shall include, but not be limited to, fuel cell technologies, renewable energy sources, and hydrogen fuel.

SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

- Air-2.5** Require that the following measures be implemented on all construction projects where project emissions are above the SLTs:
- Multiple applications of water during grading between dozer/scrapper passes
 - Paving, chip sealing or chemical stabilization of internal roadways after completion of grading
 - Use of sweepers or water trucks to remove “track-out” at any point of public street access
 - Termination of grading if winds exceed 25 miles per hour
 - Stabilization of dirt storage piles by chemical binders, tarps, fencing or other erosion control
 - Use of low-sulfur fuels in construction equipment
 - Use of low-VOC paints
 - Projects exceeding SLTs will require ten percent of the construction fleet to use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, III, IV equipment. Equipment is certified if it meets emission standards established by the EPA for mobile non-road diesel engines of almost all types. Standards established for hydrocarbons, oxides of nitrogen (NO_x), carbon monoxide, and particulate matter. Tier I standards are for engines over 50 hp (such as bulldozers) built between 1996 and 2000, and engines under 50 hp (such as lawn tractors) built between 1999 and 2000. Tier II standards are for all engine sizes from 2001 to 2006, and Tier III standards are for engines rated over 50 hp from 2006 to 2008 (EPA 1998). Tier IV standards apply to engines of all sizes built in 2008 or later. Standards are increasingly stringent from Tier I to Tier IV (EPA 2004).
- Air-2.6** Use “County Guidelines for Determining Significance for Air Quality” to identify and mitigate adverse environmental effects on air quality.
- Air-2.7** Implement County APCD regulations for air emissions from all sources under its jurisdiction.
- Air-2.8** Require New Source Review (NSRs) to prevent permitting projects that are “major sources.”
- Air-2.9** Implement the Grading, Clearing, and Watercourses Ordinance by requiring all clearing and grading to be conducted with dust control measures

- Air-2.10** Revise Board Policy F-50 to strengthen the County’s commitment and requirement to implement resource-efficient design and operations for County-funded renovation and new building projects. This could be achieved by making the guidelines within the policy mandatory rather than voluntary.
- Air-2.11** Implement County RAQS to attain State air quality standards for O₃.
- Air-2.12** Revise Board Policy G-15 to require County facilities to comply with Silver Leadership in Energy and Environmental Design (LEED) standards or other equivalent Green Building rating systems.
- Air-2.13** Revise Board Policy G-16 to require the County to:
- Adhere to the same or higher standards it would require from the private sector when locating and designing facilities concerning environmental issues and sustainability; and,
 - Require government contractors to use low emission construction vehicles and equipment.

2.3.4.3 *Non-Attainment Criteria Pollutants*

Direct and cumulative impacts associated with non-attainment criteria pollutants would be reduced with implementation of the same applicable General Plan Update policies and mitigation measures identified above in Section 2.3.4.2; however, not to a level below a level of significance. As described above in Section 2.3.4.2, the County determined that the implementation of the additional measures to reduce impacts associated with air quality violations to a less than significant level would be infeasible to implement for the reasons outlined above. Therefore, the infeasible mitigation measures identified in Section 2.3.6.2 would not be implemented, and impacts would remain significant and unavoidable from the proposed Project standpoint.

2.3.4.4 *Sensitive Receptors*

Direct and cumulative impacts associated sensitive receptors would be reduced with implementation of the same applicable General Plan Update policies and mitigation measures as identified in the General Plan Update Program EIR, and repeated below, although these impacts would not be reduced to below a level of significance because the County determined that implementation of the additional measures listed below would be infeasible for the following reasons:

- Require that all off-road or non-road diesel engines, such as those associated with construction or extraction operations, be replaced by an alternative power source, such as electricity. This measure would limit which construction contractors would be allowed to work within the County because not all contractors have alternative power source

equipment available and the measure could result in undue costs to the project applicant. Limiting the construction contractors allowed to work within the County would conflict with the Project objective to reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment and recreational opportunities. In addition, the County cannot monitor and enforce all construction activities within its jurisdiction due to funding and staffing deficiencies and ultimately because CARB has the responsibility of regulating emissions from off-road construction equipment.

- Require all diesel trucks that travel on County roads to be equipped with filters or other devices that would limit diesel emissions to below a significant level. This measure is considered to be infeasible because the County cannot monitor all diesel traffic within its jurisdiction due to funding and staffing deficiencies and ultimately because CARB has the responsibility of regulating emissions from vehicles. Implementing this measure would result in increased public costs, which would conflict with the Project objective to minimize public costs of infrastructure and services.

Because the measures listed above have been found to be infeasible, impacts would remain significant and unavoidable.

Mitigation Measures

Implementation of the following mitigation measure would reduce Project impacts to sensitive receptors, but not to below a level of significance for the reasons stated above:

- Air-4.1** Use the policies set forth in the CARB's Land Use and Air Quality Handbook (CARB 2005) as a guideline for siting sensitive land uses. Implementation of this measure will ensure that sensitive land uses such as residences, schools, day care centers, playgrounds, and medical facilities are sited appropriately to minimize exposure to emissions of toxic air contaminants (TACs).

2.3.4.5 *Objectionable Odors*

The Project would not result in significant direct and cumulative impacts related to objectionable odors through the implementation of a combination of federal, State and local regulations; existing County regulatory processes; and adopted General Plan goals and policies. Therefore, mitigation is not necessary.

SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

**TABLE 2.3-1.
AREA-WIDE AND MOBILE SOURCE EMISSIONS FOR THE PROPOSED PROJECT**

	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Tons/day (tons/year), Annual Average						
<i>Proposed Project Unmitigated Emissions</i>	591.30	4,259.55	817.60	14.60	3.65	94.51
<i>Proposed Project Mitigated Emissions</i>	565.75	4,248.60	810.30	14.60	3.65	94.29
County of San Diego SLT¹	13.7	40	100	40	15	10
Is threshold exceeded after mitigation?	Yes	Yes	Yes	No	No	Yes

1. SLTs in the GPU Final Program EIR are presented as tons/year and have been converted to tons/day for purposes of comparison with the County of San Diego and APCD emissions standards.

Source: Air Quality/Global Climate Change Analysis. Prepared by RBF Consulting. December 2012.

THIS PAGE INTENTIONALLY LEFT BLANK.