3.1.1 Air Quality

This section of the Environmental Impact Report (EIR) discusses potential impacts to air quality resources resulting from the implementation of the proposed project. The analysis is based on the existing ambient air quality of the San Diego Air Basin (SDAB), the review of existing resources, technical data, and applicable laws, regulations, and guidelines, as well as the following technical studies, which were prepared for the project in accordance with *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements – Air Quality* (County of San Diego 2007), the *Final 2024 Climate Action Plan* (2024 CAP) (County of San Diego 2024a) and the *2024 CAP Consistency Checklist and Guidelines for Determining Significance for Climate Change* (County of San Diego 2024b):

- *Starlight Solar Air Quality and Greenhouse Gas Technical Study* (Yorke Engineering, LLC 2024a) (Appendix H.1 of this EIR)
- *Starlight Solar Project – Air Quality and Greenhouse Gas Technical Study Memorandum – Project Design Update* (Yorke Engineering, LLC 2024b) (Appendix H.2 of this EIR)
- *2024 Climate Action Plan Consistency Review Checklist for Starlight Solar* (SWCA Environmental Consultants [SWCA] 2025) (Appendix H.3 of this EIR)
- *Starlight Solar Project – Air Quality and Greenhouse Gas Technical Study Memorandum – Fugitive Dust Control Measures Update* (Yorke Engineering, LLC 2025) (Appendix H.4 of this EIR)

Comments received in response to the Notice of Preparation (NOP) include concerns regarding emissions associated with project construction and operation, impacts to sensitive receptors, adverse effects to the community's health, use of diesel-powered equipment, possible toxic emissions during a potential battery fire, and the potential for the project to conflict with the San Diego Regional Air Quality Strategy. These concerns are addressed in this section of the EIR, where applicable, and within the Air Quality and Greenhouse Gas Technical Study (Appendix H.1). Copies of the NOP and comment letters received in response to the NOP are included in Appendix A, NOP, Initial Study, and Public Comments, of this EIR.

3.1.1.1 Existing Conditions

The project site is in San Diego County, south of Interstate 8 (I-8) and Old Highway 80 and east of Tierra Del Sol Road. Regional access to the project site would be provided by two highways, State Route 94 and I-8. Local access to the project site would be provided by Jewel Valley Road and, in emergencies, Tule Jim Lane, each of which connect to Old Highway 80 in the unincorporated community of Boulevard. The San Diego Gas and Electric Boulevard substation is to the north of the project site.

The project site is within the SDAB and is subject to the San Diego Air Pollution Control District's (SDAPCD) guidelines and regulations. The SDAB is in the southwest corner of California, which covers approximately 4,260 square miles, and comprises the entire San Diego region. The primary factors that determine air quality are the locations of air pollutant sources and the amounts of pollutants emitted. Meteorological and topographical conditions such as wind speed and direction, air temperature gradients, sunlight, and precipitation and humidity interact with physical landscape features to determine the movement and dispersal of criteria air pollutants.

Regional Climate and Meteorological Conditions

The boundaries of the SDAB are contiguous with the political boundaries of San Diego County. The climate of the SDAB, as with all of Southern California, is largely dominated by the strength and position of the semi-permanent high-pressure system over the Pacific Ocean, known as the Pacific High. This high-

pressure ridge over the West Coast often creates a pattern of late-night and early-morning low clouds, hazy afternoon sunshine, daytime onshore breezes, and little temperature variation year-round. San Diego County is classified as having a Mediterranean climate with warm, dry summers and mild, normally wet winters. Average annual precipitation ranges from approximately 10 inches on the coast to over 30 inches in the mountains to the east (the desert regions of San Diego County generally receive between 4 and 6 inches per year). However, recent drought conditions have resulted in below normal rainfall throughout the region.

The Mediterranean climate of San Diego County also works to create air pollution problems. Sinking or subsiding air from the Pacific High creates a temperature inversion, known as a subsidence inversion, which acts as a lid to inhibit vertical dispersion of pollutants. Weak summertime pressure gradients further limit horizontal dispersion of pollutants in the mixed layer below the subsidence inversion. Poorly dispersed anthropogenic emissions of nitrogen oxides (NO_X) and volatile organic compounds (VOC) combined with strong sunshine (ultraviolet light) leads to photochemical reactions, which result in the formation of ozone (O_3), nitrogen dioxide (NO_2), and other photochemical oxidants at this surface layer.

Daytime onshore flow (i.e., sea breeze) and nighttime offshore flow (i.e., land breeze) are common in Southern California. The sea breeze helps to moderate daytime temperatures in the western portion of San Diego County, which greatly adds to the climatic draw of the region. This also leads to emissions being blown out to sea at night and returning to land the following day. Under certain conditions, this diurnal atmospheric oscillation results in the offshore transport of air from the Los Angeles region to San Diego County, which often results in high O_3 concentrations being measured at ambient air monitoring stations operated by the County of San Diego (County). Transport of air pollutants from Los Angeles to San Diego has also been shown to occur aloft within the stable layer of the elevated subsidence inversion. In this layer, removed from fresh emissions of NO_X (which would scavenge and reduce O_3 concentrations), high levels of O_3 are transported into San Diego County.

Criteria Pollutants and Effects

Both the federal and state governments have established ambient air quality standards for outdoor concentrations of specific pollutants in order to protect public health and welfare. These pollutants are commonly known as “criteria” pollutants because their standards are based on certain “criteria” regarding impacts to health and human welfare. The federal standards, established by the U.S. Environmental Protection Agency (EPA) pursuant to the federal Clean Air Act (CAA) and subsequent amendments, are termed the National Ambient Air Quality Standards (NAAQS). The NAAQS, other than for O_3 and those based on annual averages, are maximum acceptable concentrations not to be exceeded more than once per year. The annual NAAQS may never be exceeded. The O_3 standard is not to be exceeded more than the state standards, which are established by the California Air Resources Board (CARB) and termed the California Ambient Air Quality Standards (CAAQS). The CAAQS are defined as the maximum acceptable pollutant concentrations that are not to be equaled or exceeded, depending on the specific pollutant.

NAAQS have been established for seven pollutants, specifically O_3, respirable particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), carbon monoxide (CO), NO_2, lead (Pb), and sulfur dioxide (SO_2). In addition, CAAQS have been established for sulfates, hydrogen sulfide (H_2S), vinyl chloride, and visibility reducing particles (VRPs). These pollutants are discussed in the following paragraphs.

Ozone

O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun’s energy and O_3 precursors. These precursors are mainly NO_x and VOCs. The maximum effects of precursor emissions

on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere O_3 layer (stratospheric ozone) and at the Earth's surface in the troposphere (ozone). The O_3 regulated by the EPA and CARB as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good" O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed. O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (see Appendix H.1). These health problems are particularly acute in sensitive receptors such as the sick, the elderly, and young children.

Nitrogen Dioxide

NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitrous oxide (N_2O), which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers. NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections.

Carbon Monoxide

CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions.

Sulfur Dioxide

SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO_2 can injure lung tissue and reduce visibility and the level of sunlight. SO_2 can also yellow plant leaves and erode iron and steel.

Particulate Matter

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) is 10 microns or less in diameter and is about $^1/_7$ the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush and waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) is 2.5 microns or less in diameter and is roughly $^1/_{28}$ the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-sized particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the bloodstream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility. People with influenza, people with chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate matter. Children may experience a decline in lung function due to breathing in $PM_{2.5}$ and PM_{10}.

Lead

Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern. Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient (IQ) performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

Volatile Organic Compounds

VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids. Some VOCs are also classified by the State of California as toxic air contaminants (TACs). Although there are no specific VOC ambient air quality standards, VOC is a prime component (along with NO_x) of the photochemical processes by which such criteria pollutants as O_3, NO_2, and certain fine particles are formed. They are thus regulated as "precursors" to the formation of those criteria pollutants.

Valley Fever

Valley fever (coccidioidomycosis) is an illness caused by the inhalation of soil dwelling Coccidioides (*Coccidioides* sp.) fungus spores, which live in the top 2 to 12 inches of soil in many parts of California, most prevalently in the Central Valley and in desert/dry areas (California Department of Public Health [CDPH] 2013). When soil containing this fungus is disturbed by activities such as digging or vehicular driving, or by the wind, the fungal spores become airborne and can be inhaled. Valley fever is not transmitted directly from person to person.

Valley fever can be serious and even fatal. In California, more than 1,000 people are hospitalized every year, of which about 1 in 10 have died in the hospital (CDPH 2023a). Many people who are exposed to the Coccidioides fungus spores never have symptoms, while others may have cold or flu-like symptoms that usually go away on their own after several weeks to months. Numerous mild cases of valley fever likely go undiagnosed. Valley fever usually infects the lungs and can cause flu-like symptoms or pneumonia. Some people with valley fever may develop severe disease, which may require hospitalization. In rare cases, the infection can spread beyond the lungs to other parts of the body (this is called disseminated valley fever) or be fatal (CDPH 2022).

Valley fever is considered endemic in California, with cases in California tripling from 2014 through 2018. From 2018 through 2022, between 7,000 and 9,000 cases were reported each year (CDPH 2023a). According to the CDPH, the number of reported incidences of valley fever in California in 2019 was the highest annual incidence reported in California since coccidioidomycosis became individually reportable in 1995. There were 9,090 cases reported in 2019, with an incidence rate of 22.9 cases per 100,000 population. This is a 159% increase of incidence of coccidioidomycosis since 2013 (3,329 cases, or 8.7 per 100,000 population) (CDPH 2023b). Valley fever is considered highly endemic in counties where incidence rates are greater than 20 per 100,000 population. The number of incidences has also significantly increased in San Diego County, from 113 cases and an incidence rate of 3.5 per 100,000 in 2015 to 415 cases and an incidence rate of 12.7 per 100,000 in 2021 (CDPH 2023b).

Other Criteria Pollutants

Sulfates. Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere. Sulfates can result in respiratory impairment, as well as reduced visibility.

Vinyl Chloride. Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen Sulfide. H_2S is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of H_2S include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to H_2S can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Local Air Quality

The SDAPCD is responsible for enforcing the rules and regulations protecting air quality. As part of this responsibility, the SDAPCD has created a strategy that lays out a program for attaining the standards for O_3. The strategy, called the County Regional Air Quality Strategy (RAQS), outlines the SDAPCD's plans, and control measures designed to attain the CAAQS for O3. The 2022 RAQS contains strategies to continue

directly reducing emissions of ozone precursors in San Diego County and assist in reducing PM_{10} and $PM_{2.5}$ and greenhouse gases (GHGs) as a co-benefit. Consistent with the SDAPCD's recent reorganization pursuant to Assembly Bill (AB) 423, the 2022 RAQS also proposes to expand the SDAPCD's involvement as a regional agency within its regulatory authority, by including commitments to support research and innovation opportunities, developing new partnerships with public and private entities, convening more opportunities for engagement and education with stakeholders, and integrating environmental justice and equity into all SDAPCD actions (County of San Diego 2022a).

In addition, the SDAPCD's federally enforceable control measures for O_3 precursors are included in the State Implementation Plan (SIP), which is adopted by CARB to ensure attainment of the O_3 NAAQS. These plans accommodate emissions from all sources, including natural sources. Through the implementation of control measures on stationary sources, as well as through the control measures applied to mobile sources by CARB and EPA, these plans focus on attaining the standards for the SDAB. However, the RAQS and the SIP do not address impacts from sources of PM_{10} or $PM_{2.5}$, although the SIP does include control measures (rules) to regulate stationary source emissions of those pollutants.

The 2023 RAQS relies on mobile source (vehicular) information from the San Diego Association of Governments (SANDAG), as well as information regarding projected growth in San Diego County, to determine what strategies are necessary for the reduction of stationary source emissions through regulatory controls. Since the SDAPCD only regulates non-mobile (stationary) sources, only the stationary source control measures identified in the RAQS and SIP have been incorporated by the SDAPCD into regulations. The stationary source rules are developed to set limits on the amounts of emissions from various types of industrial and commercial sources and/or require specific emission control technologies. Following rule adoption, a permit system is used to require air pollution controls on non-exempt new and modified stationary sources and to ensure compliance with regulations by prescribing specific operating conditions, monitoring, recordkeeping, reporting, emissions testing, etc. Stationary sources are inspected by the SDAPCD on a regular basis to ensure compliance with all emissions, maintenance, and operating requirements.

Air Quality Monitoring Data

The EPA designates all areas of the United States as having air quality better than or meeting the NAAQS ("attainment"), worse than the NAAQS ("nonattainment"), or ("unclassified") in areas where insufficient data exist. A nonattainment designation means that a primary NAAQS has been exceeded in a given area pursuant to a designated schedule depending on the pollutant. Pollutants in an area are often designated as unclassified when there is insufficient ambient air monitoring data for the EPA to statistically determine attainment status. Just as the EPA designates air basins as being in attainment or nonattainment of the NAAQS, CARB designates areas of the state as either in attainment or nonattainment of the CAAQS. An area is deemed as being in nonattainment if a primary NAAQS or CAAQS has been exceeded in a given area per a designated schedule depending on the pollutant, as determined from monitoring data.

San Diego County is presently designated a moderate nonattainment area for the NAAQS for O_3 and is also a nonattainment area for the CAAQS for O_3, PM_{10}, and $PM_{2.5}$. As such, the greatest concern involving criteria pollutants is whether a project would result in a cumulatively considerable net increase of PM_{10} or $PM_{2.5}$ or exceed screening-level criteria thresholds for O_3 precursors (NO_X and VOCs).

The SDAPCD currently operates eight ambient air monitoring stations located throughout the region to measure concentrations of criteria pollutants to determine whether the ambient air quality meets NAAQS and CAAQS. The ambient air monitoring sites and target criteria pollutants measured are as follows (County of San Diego 2022b, 2022c):

- Camp Pendleton (CMP) – O_3, NO_2
- Rancho Carmel Drive (RCD) – NO_2, CO, $PM_{2.5}$
- Kearny Villa Road (KVR) – O_3, NO_2, $PM_{2.5}$
- Alpine (ALP) – O_3, NO_2
- Lexington Elementary School (LES) – O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$
- Sherman Elementary School (SES) – O_3, NO_2, $PM_{2.5}$
- Chula Vista (CVA) – O_3, NO_2, PM_{10}, $PM_{2.5}$
- Donovan (DVN) – O_3, NO_2, PM_{10}

Ambient concentrations of target criteria pollutants measured in 2022 at these SDAPCD monitoring stations are presented in Table 3.1.1-1. A complete listing of the current attainment status by pollutant for the SDAB is shown in Table 3.1.1-2, and the NAAQS/CAAQS are provided in Table 3.1.1-3.

Table 3.1.1-1. San Diego County Local Ambient Air Quality Data for 2022

Unit	Averaging Time	AAQS	Monitoring Station							
			CMP	RCD	KVR	ALP	LES	SES	CVA	DVN
Ozone (O_3)										
ppm	Maximum 1 hour concentration	State: 0.09	0.08	–	0.10	0.10	0.10	0.09	0.08	0.11
ppm	Maximum 8-hour concentration	State: 0.070 Federal: 0.070	0.067	–	0.083	0.088	0.088	0.063	0.066	0.076
Nitrogen Dioxide (NO_2)										
ppm	Maximum 1-hour concentration	State: 0.18 Federal: 0.100	0.050	0.056	0.051	0.030	0.036	0.053	0.052	0.064
ppm	Annual concentration (average)	State: 0.030 Federal: 0.053	0.005	0.015	0.008	0.003	0.008	0.010	0.009	0.007
Carbon Monoxide (CO)										
ppm	Maximum 1-hour concentration	State: 20 Federal: 35	–	2.2	–	–	1.5	–	–	–
ppm	Maximum 8-hour concentration	State: 9.0 Federal: 9	–	1.2	–	–	1.1	–	–	–
Sulfur Dioxide (SO_2)										
ppm	Maximum 1-hour concentration	Federal: 0.075	–	–	–	–	0.001	–	–	–
ppm	Maximum 24-hour concentration	Federal: 0.140	–	–	–	–	0.000	–	–	–
ppm	Annual concentration (average)	Federal: 0.030	–	–	–	–	0.000	–	–	–
Coarse Particulate Matter (PM_{10})										
µg/m^3	Maximum 24-hour concentration	State: 50 Federal: 150	–	–	–	–	44	–	38	243
µg/m^3	Annual concentration (average)	State: 20	–	–	–	–	22.0	–	22.9	52.4

Unit	Averaging Time	AAQS	Monitoring Station							
			CMP	RCD	KVR	ALP	LES	SES	CVA	DVN
Fine Particulate Matter ($PM_{2.5}$)										
$\mu g/m^3$	Maximum 24-hour concentration	Federal: 35	–	14.9	13.9	–	26.4	18.1	16.2	–
$\mu g/m^3$	Annual concentration (average)	State: 12 Federal: 12.0	–	7.69	6.76	–	8.97	8.63	8.44	–

Source: County of San Diego (2022b, 2022c)

Notes:

1-hour O_3 concentrations are from the 5-Year Air Quality Summary Annual Report (County of San Diego 2022c).

– = not available or applicable; $\mu g/m^3$ = micrograms per cubic meter; ppm = parts per million.

CMP = Camp Pendleton; RCD = Rancho Carmel Drive; KVR = Kearny Villa Road; ALP = Alpine; LES = Lexington Elementary School; SES = Sherman Elementary School; CVA = Chula Vista; DVN = Donovan.

Data taken from CARB (2024) and EPA (2024) represent the highest concentrations experienced over a given year.

There is no federal standard for 1-hour O_3, annual PM_{10}, or 24-hour SO_2, nor is there a state 24-hour standard for $PM_{2.5}$.

NAAQS comparison requires Design Value calculations. Annual values are not comparable to the NAAQS.

Table 3.1.1-2. San Diego County Air Basin Attainment Status by Pollutant

Pollutant	California Standards	Federal Standards
O_3 1-Hour Standard	Nonattainment	Attainment[1]
O_3 8-Hour Standard	Nonattainment	Nonattainment (Moderate)
PM_{10}	Nonattainment	Unclassified[2]
$PM_{2.5}$	Nonattainment	Attainment
CO	Attainment	Attainment
NO_2	Attainment	Attainment
SO_2	Attainment	Attainment
Pb	Attainment	Attainment
Sulfates	Attainment	No Federal Standard
H_2S	Unclassified	No Federal Standard
VRPs	Unclassified	No Federal Standard

Source: County of San Diego (2023)

Notes:

[1] The federal 1-hour standard of 12 parts per hundred million (pphm) (0.12 ppm; 120 ppb) was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because it was employed for such a long period and because this benchmark is addressed in State Implementation Plans.

[2] Unclassified; indicates data are not sufficient for determining attainment or nonattainment.

Table 3.1.1-3. Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	Federal Standards	
			Primary	Secondary
O_3	1 Hour	0.09 ppm (180 µg/m^3)	–	Same as Primary Standard
	8 Hours	0.070 ppm (137 µg/m^3)	0.08 ppm (157 µg/m^3)	
PM_{10}	Annual Arithmetic Mean	20 µg/m^3	–	Same as Primary Standard
	24 Hours	50 µg/m^3	150 µg/m^3	
$PM_{2.5}$	24 Hours	–	35 µg/m^3	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m^3	12 µg/m^3	15 µg/m^3
CO	8 Hours	9.0 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)	–
	1 Hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	
NO_2	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as Primary Standard
	1 Hour	0.18 ppm (339 µg/m^3)	100 ppb (188 µg/m^3)	–
SO_2	Annual Arithmetic Mean	–	0.030 ppm (80 µg/m^3)	–
	24 Hours	0.04 ppm (105 µg/m^3)	0.14 ppm (365 µg/m^3)	–
	3 Hours	–	–	0.5 ppm (1,300 µg/m^3)
	1 Hour	0.25 ppm (655 µg/m^3)	75 ppb (196 µg/m^3)	–
Lead (Pb)	30-Day Average	1.5 µg/m^3	–	–
	Calendar Quarter	–	1.5 µg/m^3	Same as Primary Standard
	Rolling 3-Month Average	–	0.15 µg/m^3	
Sulfates	24 Hours	25 µg/m^3	No Federal Standards	
H_2S	1 Hour	0.03 ppm (42 µg/m^3)		
Vinyl chloride	24 Hours	0.01 ppm (26 µg/m^3)		

Source: CARB (2016)

Notes:

mg/m^3 = milligrams per cubic meter

3.1.1.2 Regulatory Setting

Federal Regulations

At the federal level, the EPA has been charged with implementing the national air quality programs. The backbone of the EPA's air quality mandate is the federal CAA signed into law in 1970 and the subsequent Clean Air Act Amendments (CAAA) of 1977 and 1990. Although the EPA deals primarily with international, national, and interstate air pollution, the CAA and CAAA grant authority to the EPA to regulate air pollution on many levels. On the state level, the EPA is responsible for oversight of a state's air quality programs. In addition, the EPA sets federal vehicle and stationary source emission standards and provides research and guidance for state and regional/local air quality programs.

Under the CAA and CAAA, the EPA established NAAQS for O_3, CO, NO_2, SO_2, and PM_{10} and $PM_{2.5}$. The NAAQS represent the allowable atmospheric concentrations at which the public health and welfare are protected and include a reasonable margin of safety to protect the more sensitive receptors in the population.

Since the elimination of lead (Pb) from motor gasoline in the mid-1970s, lead concentrations in ambient air have substantially deceased in most areas. However, elevated lead concentrations can persist in the vicinity of industrial sources, e.g., lead-acid battery recycling and manufacturing, and near general aviation airports because lead is still used to formulate high-octane aviation gasoline for piston engines.

In addition, the CAA (and its subsequent amendments) requires each state to prepare an air quality control plan referred to as the SIP. The CAAA of 1990 requires states containing areas that violate the NAAQS to revise their SIPs to incorporate additional control measures to reduce air pollution.

State Regulations

California Air Resources Board

The state agency responsible for the coordination of state and local air pollution control programs is CARB, a branch of the California Environmental Protection Agency. A primary responsibility of CARB is to develop and implement air pollution control plans designed to achieve and maintain the NAAQS established by the EPA. Although CARB has primary responsibility and produces a major portion of the SIP for pollution sources that are statewide in scope (e.g., motor vehicles), it relies on local air districts to provide additional strategies for sources under their jurisdiction, mainly stationary sources. CARB combines its data and plans with the plans provided by the local air districts and submits the SIP to the EPA. As such, the SIP consists of the emissions standards for vehicular sources set by CARB and the attainment plans, including the rules adopted by the local air districts and approved by CARB.

To ensure attainment of the NAAQS and to improve California's air quality, CARB has established a stricter set of standards in the CAAQS. The CAAQS are defined as the maximum acceptable pollutant concentrations that are not to be equaled or exceeded depending on the specific pollutant and averaging times.

Further duties of CARB include monitoring air quality. CARB has established and maintains, in conjunction with local air pollution control agencies, a network of ambient air monitoring stations. CARB is also responsible for setting emission standards for motor vehicles, consumer products, small utility engines, and off-road vehicles. CARB is additionally responsible, in conjunction with the local air districts, for developing and maintaining the AB 2588 Air Toxic “Hot Spots” program and for regulating TACs in general.

Toxic Air Contaminants

A TAC is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or that may pose a present or potential hazard to human health. Federal laws use the term hazardous air pollutants to refer to the same types of compounds that are referred to as TACs under state law. California regulates TACs primarily through the Tanner Air Toxics Act (AB 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987 (AB 2588). New sources of TACs are controlled under SDAPCD Regulation XII (SDAPCD 2024a). The regulation of toxic air pollutants is based on the levels of cancer risk and other chronic or acute health risks posed to persons who may be exposed. Joint federal, state, and local efforts to develop further regulation of air toxics will be ongoing for the foreseeable future, e.g., AB 617, the Community Air Protection Program.

Under federal law, 187 substances are listed as hazardous air pollutants (HAPs). The project would not be a major source of HAPs.

State law has established the framework for California's TAC identification and control program, which is generally more stringent than the federal program and is aimed at HAPs that are problematic in California.

The state has formally identified more than 200 substances as TACs. The California Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) is a statewide program that requires facilities to quantify actual (historic) emissions of TACs, conduct a Health Risk Assessment (HRA) if required, notify the public if required, and, if necessary, develop risk reduction strategies. SDAPCD Rule 1210 implements the public notification and risk reduction requirements of the California Air Toxics "Hot Spots" Information and Assessment Act of 1987 and establishes acceptable risk levels and emission control requirements for new and modified stationary source facilities that may emit TACs (SDAPCD 2024b).

Typically, land development projects generate diesel exhaust emissions from off-road construction equipment and on-road vehicles. During the construction phase, as well as from trucks during the operational phase, diesel particulate matter (DPM) would be emitted. Emissions from diesel engines currently include over 40 substances that are listed by the EPA as HAPs. In addition, DPM is listed as a TAC by CARB.

Local Regulations

San Diego County Air Pollution Control District

The SDAPCD is a County agency with the authority to regulate stationary, indirect, and area sources of air pollution (e.g., power plants, highway construction, and housing developments) within the SDAB.

The SDAPCD is primarily responsible for the control of air pollution from all sources other than emissions from motor vehicles (mobile sources), which are the responsibility of CARB and the EPA. Under federal and state law, the SDAPCD is required to adopt and enforce rules and regulations to achieve NAAQS and CAAQS and implement applicable federal and state laws. Since the passage of the California Clean Air Act (CCAA) and the CAA, this role has been expanded to include the implementation of transportation control measures and indirect source control programs to reduce mobile source emissions. The following rules and regulations would apply to construction and operation of the project:

SDAPCD Regulation II: Permits; Rule 20.2: New Source Review Non-Major Stationary Sources. This rule requires new or modified stationary source units (that are not major stationary sources) with the potential to emit 10 pounds (lbs) per day or more of VOCs, NO_x, SO_x, or PM_{10} to be equipped with best available control technology. For those units with a potential to emit above air quality impact assessment trigger levels, the units must demonstrate that such emissions would not violate or interfere with the attainment of any national air quality standard (SDAPCD 2019).

SDAPCD Regulation IV: Prohibitions; Rule 50: Visible Emissions. This rule prohibits discharge into the atmosphere, from any single source of emissions whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any period of 60 consecutive minutes that is darker in shade than that designated as Number 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines, or of such opacity as to obscure an observer's view to a degree greater than does smoke of a shade designated as Number 1 on the Ringelmann Chart (SDAPCD 1997). Construction of the project may result in visible emissions, primarily during earth-disturbing activities, which would be subject to SDAPCD Rule 50. Although visible emissions are less likely to occur during operation of the project, compliance with SDAPCD Rule 50 would be required during both construction and operation.

SDAPCD Regulation IV: Prohibitions; Rule 51: Nuisance. This rule prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property (SDAPCD 1976). Any criteria air pollutant emissions, TAC emissions, or odors that would be generated during construction or operation of the project would be subject to SDAPCD Rule 51. Violations can be

reported to SDAPCD in the form of an air quality complaint by telephone, email, or online form. Complaints are investigated by SDAPCD as soon as possible.

SDAPCD Regulation IV: Prohibitions; Rule 55: Fugitive Dust. This rule regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site (SDAPCD 2009). Construction of the project may result in fugitive dust emissions that would be subject to SDAPCD Rule 55.

SDAPCD Regulation IV: Prohibitions; Rule 67: Architectural Coatings. This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from these coatings, primarily by placing limits on the VOC content of various coating categories (SDAPCD 2021). Construction and operation of the project would include application of architectural coatings, and would be subject to the VOC content limits identified in SDAPCD Rule 67, which applies to coatings manufactured, sold, or distributed within San Diego County.

SDAPCD Regulation XII: Toxic Air Contaminants; Rule 1200: Toxic Air Contaminants – New Source Review. This rule requires new or modified stationary source units with the potential to emit TACs above rule threshold levels to either demonstrate that they will not increase the maximum incremental cancer risk above 1 in 1 million at every receptor location, or demonstrate that toxics best available control technology (T-BACT) will be employed if maximum incremental cancer risk is equal to or less than 10 in 1 million, or demonstrate compliance with SDAPCD's protocol for those sources with an increase in maximum incremental cancer risk at any receptor location of greater than 10 in 1 million but less than 100 in 1 million (SDAPCD 2024a). The project's emergency generators would be subject to SDAPCD Rule 1200 and would be subject to New Source Review requirements.

SDAPCD Regulation XII: Toxic Air Contaminants; Rule 1210: Toxic Air Contaminant Public Health Risks – Public Notification and Risk Reduction. This rule requires each stationary source that is required to prepare a public risk assessment to provide written public notice of risks at or above the following levels: maximum incremental cancer risks equal to or greater than 10 in 1 million, or cancer burden equal to or greater than 1.0, or total acute non-cancer health hazard index equal to or greater than 1.0, or total chronic noncancer health hazard index equal to or greater than 1.0 (SDAPCD 2024b).

Regional Air Quality Plans

As previously stated, a nonattainment designation means that a primary NAAQS or CAAQS has been exceeded in a given area per a designated schedule depending on the pollutant. For each nonattainment area within the state, the CCAA has specified air quality management strategies that must be adopted by the agency responsible for the nonattainment area. Each area must prepare and adopt an Air Quality Management Plan or RAQS, which lays out programs for attaining the CAAQS and NAAQS for all criteria pollutants. At present, no attainment plan for $PM_{2.5}$ or PM_{10} in San Diego County is required by the state regulations.

The County's RAQS for the SDAB was most recently updated in 2022. The RAQS outlines the SDAPCD's plans and control measures designed to attain the state air quality standards for O_3. In addition, the SDAPCD relies on the SIP, which includes the SDAPCD's plans and control measures for attaining the O_3 NAAQS. These plans accommodate emissions from all sources, including natural sources, through implementation of control measures, where feasible, on sources to attain the standards. The RAQS relies on information from the SANDAG, including the SANDAG Transportation Control Measures Plan, and information regarding projected growth in San Diego County to identify strategies for the reduction of stationary source emissions through regulatory controls.

San Diego County General Plan

San Diego County General Plan: A Plan for Growth, Conservation, and Sustainability (General Plan) (County of San Diego 2011) outlines a number of GHG strategies to comply with AB 32. AB 32 mandates the reduction of GHG emissions, and the General Plan includes a number of policies to meet this goal.

San Diego County 2024 Climate Action Plan

The County has developed the *Final 2024 Climate Action Plan* (2024 CAP) (County of San Diego 2024a), a comprehensive strategy to reduce GHG emissions in its unincorporated communities and from County operations. In July 2024, the Planning Commission recommended adoption of the 2024 CAP to the County Board of Supervisors. On September 11, 2024, the County Board of Supervisors adopted the 2024 CAP (County of San Diego 2025). The 2024 CAP identifies strategies, measures, and actions to meet the County's targets to reduce GHG emissions by 2030 and 2045, consistent with the state's 2022 Scoping Plan for Achieving Carbon Neutrality and legislative GHG reduction targets and demonstrates progress toward the state's 2045 net zero GHG emissions goal. The CAP's attainment of the County's GHG reduction targets is the result of (1) several initiatives to be directly implemented by the County and (2) incorporating GHG reduction features into the construction and operation of development projects (including County-initiated and privately initiated projects).

In order to demonstrate consistency with the 2024 CAP, the County has developed a CAP Consistency Review Checklist (CAP Consistency Checklist). The checklist establishes a two-step process to determine if a project is consistent with the CAP. Step 1 of the checklist evaluates a project's consistency with the growth projections used in the CAP to estimate future GHG emissions from activities in unincorporated areas of San Diego County. Since the CAP uses growth projections based on the adopted General Plan, the first step in determining a project's consistency with the CAP is to demonstrate its alignment with the regional categories and land use designations of the General Plan. All projects must show consistency with the existing General Plan regional categories, land use designations, and the uses and development density and intensity allowed under the Zoning Ordinance. If a project is consistent with the General Plan, then Step 2 of the checklist should be completed. If a project is not consistent with the regional categories or land use designations of the General Plan, it cannot use the CAP Consistency Checklist for CEQA streamlining. Step 2 of the checklist outlines CAP measures and actions as "consistency requirements" that project proponents must incorporate into their projects to demonstrate compliance with the CAP. Projects are required to show consistency with the CAP requirements or explain why the requirements are not applicable. Appendix H.3 presents the project's 2024 CAP Consistency Checklist (SWCA 2025).

San Diego County Zoning Ordinance Section 6318

The Zoning Ordinance requires that all commercial and industrial uses be operated so they do not emit matter causing unpleasant odors that are perceptible by the average person at or beyond any lot line of the lot containing said uses. Section 6318 goes on to provide specific dilution standards that must be met "at or beyond any lot line of the lot containing the uses" (County of San Diego 2022d:1-04).

3.1.1.3 Analysis of Project Effects and Determination as to Significance

Guidelines For Determination of Significance

For the purpose of this EIR, Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements: Air Quality* (County of San Diego 2007) apply to both the direct impact analysis and the cumulative impact analysis.

A significant impact would result if the project would:

1. Conflict with or obstruct the implementation of the San Diego County RAQS and/or applicable portions of the SIP;
2. Result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation:
    a. Result in total emissions (stationary, fugitive, and mobile sources) exceeding the screening-level thresholds in Table 3.1.1-4 for NO_x, VOCs, PM_{10}, and $PM_{2.5}$;
    b. Result in emissions that exceed 250 lbs per day of NO_x or 75 lbs per day of VOCs;
    c. Result in emissions of CO that exceed 550 lbs per day, or the screening-level thresholds, and when t) or an 8-hour average of 9 ppm;
    d. Result in emissions of $PM_{2.5}$ that exceed 55 lbs per day; and
    e. Result in emissions of PM_{10} that exceed 100 lbs per day and increase the ambient PM_{10} concentration by 5.0 micrograms per cubic meter ($\mu g/m^3$) or greater at the maximum exposed individual receptor;
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the SDAB is nonattainment under an applicable federal or state ambient air quality standard (including emissions which exceed the screening-level thresholds for O_3 precursors listed in Table 3.1.1-4 for PM_{10}, $PM_{2.5}$, and O_3 precursors, specifically NO_x and VOCs);
4. Expose sensitive receptors (including but not limited to K-12 schools, hospitals, resident care facilities, daycare centers, and residents) to substantial pollutant concentrations:
    a. Place sensitive receptors near CO hot spots or creates CO hot spots near sensitive receptors; and
    b. Result in exposure to TACs resulting in a maximum incremental cancer risk greater than 1 in 1 million without the application of T-BACT, an incremental cancer risk greater than 10 in 1 million with application of T-BACT, or a health hazard index greater than one would be deemed as having a potentially significant impact; and
5. Expose a considerable number of persons to objectionable odors.

For projects whose total stationary, fugitive, and mobile source emissions exceed the screening-level thresholds listed in Table 3.1.1-4, an Air Quality Impact Assessment (AQIA) is typically required to show that project emissions would not cause a violation of an air quality standard or contribute substantially to an existing or projected air quality violation.

Table 3.1.1-4. Screening-Level Thresholds for Air Quality Impact Assessment

Air Contaminant	County AQIA Thresholds for Mass Emission Rates		
	(lbs/hour)	(lbs/day)	(tons/year)
NO_x	25	250	40
CO	100	550	100
PM_{10}	–	100	15
SO_x	25	250	40
Lead and lead compounds	–	3.2	0.6
$PM_{2.5}$	–	55	10
VOC	–	75	13.7

Source: County of San Diego (2007)

Analysis Methodology

The construction analysis was performed using California Emissions Estimator Model (CalEEMod) version 2022.1.1.20 (California Air Pollution Control Officers Association [CAPCOA] 2022), the official statewide land use computer model designed to provide a uniform platform for estimating potential criteria pollutant and GHG emissions associated with both construction and operations of land use projects under CEQA. The model quantifies direct emissions from construction (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The mobile source emission factors used in the model, published by CARB, include the Pavley standards and Low Carbon Fuel standards. The model also identifies project design features, regulatory measures, and mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from the selected measures. CAPCOA developed CalEEMod in collaboration with the California air districts. Default land use data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) were provided by the various California air districts to account for local requirements and conditions. As the official assessment methodology for land use projects in California, CalEEMod is relied upon herein for construction and operational emissions quantification, which forms the basis for the impact analysis.

Construction

A project's construction phase produces many types of emissions, but PM_{10} (including $PM_{2.5}$) in fugitive dust and diesel engine exhaust are the pollutants of greatest concern. Fugitive dust emissions can result from a variety of construction activities, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle exhaust. Construction-related emissions can cause substantial increases in localized concentrations of PM_{10}, as well as affecting PM_{10} compliance with ambient air quality standards on a regional basis. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. The use of diesel-powered construction equipment emits the O_3 precursors NO_x, VOCs, and DPM, the latter being a composite of TACs containing a variety of hazardous substances. Large construction projects using multiple large earth-moving equipment are evaluated to determine if operations may exceed the District's daily threshold for NO_x emissions and could temporarily expose area residents to hazardous levels of DPM. Use of architectural coatings and other materials associated with finishing buildings may also emit VOC and TACs. CEQA significance thresholds address the impacts of construction activity emissions on local and regional air quality. Thresholds are also provided for other potential impacts related to project construction, such as odors and TACs.

PM_{10} emitted during construction can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors. Despite this variability in emissions, experience has shown that there are several feasible control measures that can be reasonably implemented to significantly reduce fugitive dust emissions from construction, primarily through frequent water application, constitutes sufficient mitigation to reduce PM_{10} impacts to a level considered less than significant.

The project may require blasting during construction activities to facilitate building of solar array foundations. During blasting operations, other construction activities would temporarily stop and resume once blasting is completed. Blasting would occur at 2- to 3-day intervals, with no more than one blast per day. It is estimated that 5,000 cubic yards of rock would be blasted during the early stages of excavation and mass grading for Phase I. The area of each blast would be limited to 30,000 square feet. Blasting operations usually require a chemical material that is capable of extremely rapid combustion resulting in an explosion or detonation. These materials are usually mixtures of several ingredients but are often oxygen-deficient as combustion reactions take place which causes a formation of CO and to a lesser extent, NO_x. Gelatin Dynamite (dynamite with 20%–100% nitroglycerin) is expected to generate CO in quantities of 104 lbs per every ton of explosives detonated and NO_x at 53 lbs per ton (see Appendix H.1).

Operations

The term "project operations" refers to the full range of activities that can or may generate criteria pollutants, GHG, and TAC emissions when the project is functioning in its intended use. For projects such as office parks, shopping centers, apartment buildings, residential subdivisions, and other indirect sources, motor vehicles traveling to and from the project represent the primary source of air pollutant emissions. For industrial projects and some commercial projects, equipment operation and manufacturing processes, i.e., permitted stationary sources, can be of greatest concern from an emissions standpoint. CEQA significance thresholds address the impacts of operational emission sources on local and regional air quality. Thresholds are also provided for other potential impacts related to project operations, such as odors.

The project would be operated remotely and normally unoccupied. Operational emissions of the project would be minimal, limited to the occasional use of maintenance vehicles and as-needed use of small equipment, e.g., portable utility generators. Minimal operational emissions are not quantified because such estimates would be speculative.

Future Decommissioning

The aboveground (detachable) equipment and structures would be disassembled and removed from the site when the facility reaches the end of its useful economic life, assumed to be 30 years in service. Detachable elements include all photovoltaic modules and support structures, battery storage units, inverters, transformers, and associated controllers. Fencing, substation, and aboveground conductors on the transmission facilities would be removed next. Underground collector and transmission components would then be removed. Most of these materials would be recycled or reclaimed. Remaining materials that cannot be recycled or reclaimed would be limited and would be contained and disposed of off-site, consistent with the County's Construction and Demolition Materials Diversion Program (County of San Diego Code of Regulatory Ordinances Sections 68.508–68.518). The activities associated with decommissioning would not include substantial earthmoving, such as grading.

CO Hotspots

Throughout California, the emissions and ambient concentrations of CO have decreased substantially since the mid-1970s. The SDAPCD is designated as attainment or unclassifiable for both the NAAQS and

CAAQS for CO. These improvements are largely due to the introduction of lower-emitting motor vehicles equipped with three-way catalytic converters and cleaner-burning oxygenated fuels. Because of the substantial reductions of vehicular CO exhaust, CO hotspot analyses are no longer needed to demonstrate that project-related CO emissions would not cause an exceedance of the NAAQS and CAAQS. Additionally, the project site is rural and in attainment with state and federal ambient air quality standards for CO. Exhaust emissions would be dispersed over a wide desert area with characteristic seasonal winds. Due to dispersion and the non-urban nature of the project site, i.e., few receptors, a CO hotspot analysis would be expected to show less than significant air quality impacts, i.e., well under state ambient air quality standards (20 parts per million by volume [ppmv] per hour and 9 ppmv per 8 hours).

TACs

Due to the short duration of construction activities, approximately 1 year, with typical grading activities and limited fill being hauled to the site (e.g., substation and battery facilities which must be on flat ground), and since the criteria pollutant construction emissions are well below the CEQA thresholds, emissions of TACs (as DPM) are not expected to result in exposing widely dispersed sensitive receptors to substantial pollutant concentrations. As such, an HRA was not deemed necessary for the project.

Operational emissions of the project would be minimal for the normally unoccupied solar energy facility, limited to the occasional use of maintenance vehicles and as-needed use of small equipment, e.g., portable utility generators. Minimal operational emissions are not quantified because such estimates would be speculative.

Dust Control Measures

The project would implement the following best management practices (BMPs), which are also accounted for in the construction emission modeling prepared for the project.

- Prior to the County's approval of any grading permits and during proposed project construction, a Fugitive Dust Control Plan will be prepared demonstrating compliance with SDAPCD Rule 55 and County Code Section 87.428 (Grading Ordinance), to the satisfaction of the County. The project applicant or its designee will require implementation of the following fugitive dust measures to minimize PM_{10} emissions as part of the Fugitive Dust Control Plan. All measures will be designated on Grading and Improvement Plans.
    - Prior to construction activities, the project applicant will employ a construction relations officer who will address community concerns regarding on-site construction activity. The project applicant will provide public notification in the form of a visible sign containing the contact information of the construction relations officer who will document complaints and concerns regarding on-site construction activity. The sign will be placed in easily accessible locations and noted on Grading and Improvement Plans.
    - Grading areas will be watered, or another SDAPCD-approved dust control non-toxic agent will be used, at least three times daily, to minimize fugitive dust only where chemical stabilizers are not used.
    - All permanent roads and the paved access roadway improvements will be constructed and paved as early as possible in the construction process to reduce construction vehicle travel on unpaved roads. Foundations will be finalized as soon as possible following site preparation and grading activities to reduce fugitive dust from earth-moving operations.
    - Grading areas will be stabilized as quickly as possible to minimize fugitive dust.
    - Wheel washers, grates, rock, or road washers will be installed adjacent to the site access points for tire inspection and washing prior to vehicle entry on public roads.

  - Visible track-out into traveled public streets will be removed with the use of sweepers, water trucks, or similar method within 30 minutes of occurrence.
  - Haul trucks will be covered or at least 2 feet of freeboard will be maintained to reduce blow-off during hauling.
  - A 15-mile-per-hour speed limit on unpaved surfaces will be enforced.
  - Haul truck staging areas will be provided for loading and unloading of soil and materials and will be located away from sensitive receptors at the farthest feasible distance.
- All architectural coatings used during construction will be SDAPCD Rule 67–compliant.
- Paved roads will be cleaned regularly during construction.
- During blasting activities, the construction contractor will implement all feasible engineering controls to control fugitive dust including exhaust ventilation, blasting cabinets and enclosures, vacuum blasters, drapes, water curtains, or wet blasting. Watering methods, such as water sprays and water applications, also will be implemented during blasting, rock crushing, cutting, chipping, sawing, or any activity that will release dust particles to reduce fugitive dust emissions.
- All internal access road surfaces will be consistent with the Caltrans Class II standard construction specifications, and will be composed of permeable decomposed granite, and permeable in order to reduce fugitive dust and erosion in accordance with County Code Section 87.428, Dust Control Measures, and with San Diego Air Pollution Control District Rule 55, which regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions.

Conformance to Regional Air Quality Strategy

Guidelines for the Determination of Significance

This impact analysis considers the following County guideline:

- The proposed project would conflict with or obstruct the implementation of the RAQS and/or applicable portions of the SIP.

Analysis

Project consistency is based on whether the project would conflict with or obstruct the implementation of the RAQS and/or applicable portions of the SIP, which would lead to increases in the frequency or severity of existing air quality violations. The RAQS outlines the SDAPCD's plans and control measures designed to attain the CAAQS for O_3. In addition, the SDAPCD relies on the SIP, which includes the SDAPCD's plans and control measures for attaining the O_3 NAAQS. The RAQS is largely based on population predictions by the SANDAG.

The project would comply with all SDAPCD rules and regulations results and would be in conformance with SDAPCD air quality plans. These air quality attainment plans are a compilation of new and previously submitted plans, programs (e.g., monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls describing how the state will attain ambient air quality standards. The RAQS, SIP, and associated control measures are based on information derived from projected growth in San Diego County in order to project future emissions and then determine strategies and regulatory controls for the reduction of emissions. Growth projections are based on the General Plan developed by the County and its incorporated cities.

Although the project would contribute to energy supply, which is one factor of population growth, the project would not significantly increase employment, population, or growth within the region. The project does not include residential development or large local or regional employment centers, and thus would not result in significant population or employment growth. Furthermore, the operation of the project would create renewable energy over its planned lifetime, helping California meet its Renewables Portfolio Standard, and decrease the need for energy from fossil fuel–based power plants in the state, which is considered a beneficial impact to statewide air quality. The energy produced by the project would displace the criteria pollutant emissions that would otherwise be produced by existing, business-as-usual power generation resources (including natural gas and coal).

The thresholds of significance, adopted by SDAPCD, determine compliance with the goals of attainment plans in the region. As such, emissions below SDAPCD daily and annual significance emissions thresholds would not conflict with or obstruct implementation of the applicable air quality plans. The project implementation would generate emissions of criteria air pollutants during construction and operation. The emissions from project construction (Table 3.1.1-5, Table 3.1.1-6, and Table 3.1.1-7) are below the thresholds of significance; therefore, the project does not conflict with implementation of SDAPCD applicable air quality plans. The detailed assumptions and calculations, as well as CalEEMod outputs, are provided in Appendix H.1 and Appendix H.4. Therefore, the project would have **less-than-significant impacts**.

Conformance to Federal and State Ambient Air Quality Standards

Guidelines for the Determination of Significance

This impact analysis considers the following County guideline:

- Result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation:
    - Result in total emissions (stationary, fugitive, and mobile sources) exceeding the screening-level thresholds in Table 3.1.1-4 for NO_x, VOCs, PM_{10}, and $PM_{2.5}$;
    - Result in emissions that exceed 250 lbs per day of NO_x or 75 lbs per day of VOCs;
    - Result in emissions of CO that exceed 550 lbs per day, or the screening-level thresholds, and when totaled with the ambient concentrations exceed a 1-hour concentration of 20 ppm or an 8-hour average of 9 ppm;
    - Result in emissions of $PM_{2.5}$ that exceed 55 lbs per day; and
    - Result in emissions of PM_{10} that exceed 100 lbs per day and increase the ambient PM_{10} concentration by 5.0 $\mu g/m^3$ or greater at the maximum exposed individual receptor;

Analysis

SDAPCD's thresholds of significance represent the allowable emissions a project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed SDAPCD's thresholds of significance on a project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. The region is designated as nonattainment for federal and state 8-hour O_3 standards, federal and state 24-hour PM_{10} standards, and state $PM_{2.5}$ standards. Impacts related to construction and operation of the project are addressed separately below.

Construction

Construction of the project would generate emissions of criteria air pollutants and fugitive dust as a result of soil disturbance and the use of on-site construction equipment, as well as from off-site trucks hauling water and construction materials to the project site. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Fugitive dust emissions would primarily result from site preparation and road construction activities. NO_x and CO emissions would primarily result from the use of construction equipment and motor vehicles. The estimated unmitigated emissions from construction of the project are summarized in Table 3.1.1-5, Table 3.1.1-6, and Table 3.1.1-7. The detailed assumptions and calculations, as well as CalEEMod outputs, are provided in Appendix H.1 and Appendix H.4.

Blasting would generate CO and NO_x in quantities of 104 and 53 lbs per every ton of explosives detonated, respectively. With the use of up to three tons of explosives per day, construction CO and NO_x emissions would remain below the SDAPCD thresholds. Approximately 0.22 lbs of PM_{10} per day would be generated during the blasting operations.

Table 3.1.1-5. Construction Annual Emissions Summary and Significance Evaluation

Criteria Pollutants	Unmitigated Emissions (tons/year)	Threshold (tons/year)	Threshold Exceeded?
VOC	0.47	13.7	*No*
NO_x	4.07	40	*No*
CO	4.68	100	*No*
SO_x	0.01	40	*No*
Total PM_{10}	1.33	15	*No*
Total $PM_{2.5}$	0.64	10	*No*

Source: Yorke Engineering, LLC (2025) (Appendix H.4)
Notes:
Total PM_{10} / $PM_{2.5}$ includes both fugitive dust and engine exhaust.

Table 3.1.1-6. Construction Daily Emissions Summary and Significance Evaluation

Criteria Pollutants	Unmitigated Emissions (lbs/day)	Threshold (lbs/day)	Threshold Exceeded?
VOC	6.51	75	*No*
NO_x	65.43	250	*No*
CO	61.11	550	*No*
SO_x	0.11	250	*No*
Total PM_{10}	30.06	100	*No*
Total $PM_{2.5}$	16.21	55	*No*

Sources: Yorke Engineering, LLC (2025) (Appendix H.4)
Notes:
lbs/day emissions are winter or summer maximum for planned land use.
Total PM_{10} / $PM_{2.5}$ includes both fugitive dust plus engine exhaust.

Table 3.1.1-7. Construction Hourly Emissions Summary and Significance Evaluation

Criteria Pollutants	Unmitigated Emissions (lbs/hour)	Threshold (lbs/hour)	Threshold Exceeded?
VOC	0.81	–	*No*
NO_x	8.18	25	*No*
CO	7.64	100	*No*
SO_x	0.01	25	*No*
Total PM_{10}	3.76	–	*No*
Total $PM_{2.5}$	2.03	–	*No*

Yorke Engineering, LLC (2025) (Appendix H.4)
Notes:
Assumes 8-hour construction workday
Total PM_{10} / $PM_{2.5}$ includes both fugitive dust and engine exhaust.

As shown in Table 3.1.1-5, Table 3.1.1-6, and Table 3.1.1-7, even without incorporation of dust control measures, estimated unmitigated construction emissions for all pollutants are below SDAPCD annual, daily, and hourly significance thresholds. Therefore, impacts from construction-related air pollutant emissions would be **less than significant.**

Operation

Operational emissions are subject to the same SDAPCD significance thresholds displayed above. It is anticipated that operational emissions of the project would be minimal and would be limited to the occasional use of on-road vehicles (about 50 to 100 trips per year) for maintenance of the solar facility. As such, it is anticipated that the operational emissions would be minimal and were not quantified because such estimates would be speculative. Therefore, impacts from operational air pollutant emissions would be **less than significant.**

Decommissioning

Additionally, it is expected that the air quality emissions from decommissioning the solar facility would be less than the emissions generated during construction because no substantial earthmoving would be necessary. Thus, the potential air quality impacts from the project's decommissioning activities would also be considered **less than significant.**

Therefore, the project would not violate any air quality significance thresholds or contribute substantially to an existing or projected air quality violation and the project would have a **less-than-significant impact.**

Impacts to Sensitive Receptors

Guidelines for the Determination of Significance

This impact analysis considers the following County guidelines:

- The project places sensitive receptors near CO "hotspots" or creates CO "hotspots" near sensitive receptors.
- Project implementation will result in exposure to TACs resulting in a maximum incremental cancer risk greater than 1 in 1 million without application of Toxics-Best Available Control Technology or a health hazard index greater than one would be deemed as having a potentially significant impact.

Analysis

Some population groups, such as children, the elderly, and acutely and chronically ill persons are considered more sensitive to air pollution than others. Sensitive receptor locations typically include residential areas, hospitals, elder-care facilities, rehabilitation centers, daycare centers, and parks. Sensitive receptors near the site include the single-family residences to the north, east, and west; and the Clover Flat Elementary School approximately 3,700 feet (0.7 mile) to the northwest. The nearest sensitive receptors to the project include residences approximately 150 feet west.

Construction

Carbon Monoxide

Projects that would site sensitive receptors near potential CO hotspots (i.e., zones where the CO concentration exceeds the NAAQS and/or CAAQS) or would contribute vehicle traffic to local intersections where a CO hotspot could occur would be considered as having a potentially significant impact. Because of the substantial reductions of vehicular CO exhaust, CO hotspot analyses are no longer needed to demonstrate project related CO emissions would not cause an exceedance of the NAAQS and CAAQS. Additionally, the project site is rural and in attainment with state and federal ambient air quality standards for CO. Emissions would be dispersed over a wide desert area with characteristic seasonal winds. Due to dispersion and the non-urban nature of the project site, i.e., few receptors, a CO hotspots analysis would be expected to show less than significant air quality impacts, i.e., well under state ambient air quality standards (20 ppmv per hour; 9 ppmv per 8 hours). Thus, a CO hotspot analysis is not necessary, and construction-related impacts would be **less than significant.**

Toxic Air Contaminants

It is expected that cumulative CO impacts from decommissioning the solar facility would be less than that for construction because no substantial earthmoving would be necessary. Additionally, operational maintenance trips to the facility would occur once or twice a week (50 to 100 trips per year). Due to vehicle exhaust control improvements and infrequent site visits, a CO hotspot analysis is not necessary, and operational impacts would be **less than significant.**

Projects that would result in exposure to TAC resulting in a maximum incremental cancer risk greater than 1 in 1 million, without the application risk reduction measures, or a threshold of 10 in 1 million for projects implementing best emission control technologies or an HIA or HIC greater than one would be considered as having a potentially significant impact. The TAC of most concern associated with construction is DPM, which is a potent carcinogen. For permanent (long-term) sources, cancer risk is typically predicted for a lifetime exposure of 30 years, although the construction duration is much shorter. Construction activities are expected to last approximately 2.5 years, or about 8% of the long-term criterion. Due to the short-term nature of the construction activities and low construction emissions associated with the project, impacts from TAC emissions are expected to be low; therefore, sensitive receptors would not be exposed to substantial pollutant concentrations. It is expected that TAC impacts from decommissioning the solar facility would be less than that for construction because no substantial earthmoving would be necessary. Impacts to sensitive receptors related to construction and decommissioning TACs would be **less than significant.**

Operation

Carbon Monoxide

Consistent with the County's guidelines, analysis of potential CO hotspots would not be required for the project as it does not propose uses that would significantly contribute to local population or employment growth or congestion on local roadways. The addition of vehicles during operations would not significantly contribute peak-hour trips in the project area or impact roadway intersections. During operations, the project would be an unoccupied facility that would be monitored remotely. Periodic inspections, washing and repair, or maintenance would occur and generate an anticipated maximum of 20 average daily trips should these activities occur simultaneously. Therefore, the project would not have the potential to create a CO hotspot or result in a considerable net increase of CO. Impacts would be **less than significant**.

Toxic Air Contaminants

Minimal TACs would be emitted during operation of the solar facility, therefore, sensitive receptors would not be exposed to substantial pollutant concentrations. Impacts would be **less than significant**.

Therefore, emissions resulting from construction and operation of the project would be minimal and would not expose sensitive receptors to substantial pollutant concentrations. As such, construction-related and operational impacts to sensitive receptors would be **less than significant**.

Other Emission Impacts

Guidelines for the Determination of Significance

This impact analysis considers the following County guideline:

- The project, which is not an agricultural, commercial, or an industrial activity subject to SDAPCD standards, as a result of implementation, would either generate objectionable odors or place sensitive receptors next to existing objectionable odors, which would affect a considerable number of persons or the public.

Analysis

Land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The project would not be a source of any odors during operations. Construction of the project could result in emission of odors from construction equipment and vehicles. During construction, a limited number of diesel engines would be operated on the project site for limited durations. Diesel exhaust and VOCs from these diesel engines would be emitted; however, the short duration of construction activities is expected be limited in extent at any given time and distributed through the project site. In addition, emissions would disperse rapidly from the project site and diesel exhaust odors would be consistent with existing vehicle odors in the area.

No mitigation measures are needed to reduce project impacts to less than significant. The project's impact with respect to odor levels would be **less than significant**.

3.1.1.4 Cumulative Impact Analysis

Cumulatively Considerable Net Increase of Criteria Pollutants (Construction)

Guidelines for the Determination of Significance

The *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements – Air Quality* (County of San Diego 2007) applies to the cumulative impact analysis. Cumulatively considerable net increases during the construction phase would typically occur if two or more projects near each other are simultaneously under construction. A significant impact would result if:

- A project that has a significant direct impact on air quality with regard to emissions of PM_{10}, $PM_{2.5}$, NOx and/or VOCs would also have a significant cumulatively considerable net increase.
- In the event direct impacts from a proposed project are less than significant, a project may still have a cumulatively considerable impact on air quality if the emissions of concern from the proposed project, in combination with the emissions of concern from other proposed projects or reasonably foreseeable future projects within a proximity relevant to the pollutants of concern, are in excess of the guidelines identified in Table 3.1.1-5.

Analysis

A project's construction phase produces many types of emissions, but PM_{10} (including $PM_{2.5}$) in fugitive dust and diesel engine exhaust are the pollutants of greatest concern. Fugitive dust emissions can result from a variety of construction activities, including excavation, grading, demolition, vehicle travel on paved and unpaved surfaces, and vehicle exhaust. Construction-related emissions can cause substantial increases in localized concentrations of PM_{10}, as well as affecting PM_{10} compliance with ambient air quality standards on a regional basis. Particulate emissions from construction activities can lead to adverse health effects as well as nuisance concerns such as reduced visibility and soiling of exposed surfaces. The use of diesel-powered construction equipment emits O_3 precursors oxides of nitrogen (NOx) and reactive organic gases (ROG), and DPM, the latter being a composite of TACs containing a variety of hazardous substances. Large construction projects using multiple large earthmoving equipment are evaluated to determine if operations may exceed the District's daily threshold for NOx emissions and could temporarily expose area residents to hazardous levels of DPM. Use of architectural coatings and other materials associated with finishing buildings may also emit ROG and TACs. CEQA significance thresholds address the impacts of construction activity emissions on local and regional air quality. Thresholds are also provided for other potential impacts related to project construction, such as odors and TACs.

PM_{10} emitted during construction can vary greatly depending on the level of activity, the specific operations taking place, the equipment being operated, local soils, weather conditions, and other factors. Despite this variability in emissions, experience has shown that there are several feasible control measures that can be reasonably implemented to significantly reduce fugitive dust emissions from construction, primarily through frequent water application, constitutes sufficient mitigation to reduce PM_{10} impacts to a level considered less than significant. The project would incorporate dust control practices which would minimize PM_{10} and $PM_{2.5}$ emissions.

Projects that would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (PM_{10}, $PM_{2.5}$, or an exceedance of quantitative thresholds for O_3 precursors, NO_x and VOCs) would be considered as having a potentially significant impact. In the event direct impacts from a proposed project are less than significant, a project may still have a cumulatively considerable impact on air quality if the emissions of concern from the proposed project, in combination with the emissions of concern from other proposed

projects or reasonably foreseeable future projects within a proximity relevant to the pollutants of concern, are in excess of the levels of significance. Cumulatively considerable net increases during the construction phase would typically happen if two or more projects near each other are simultaneously constructing projects. Construction-related emissions of the criteria pollutants are significantly less than the SDAPCD levels of significance and would therefore not cause a significant direct impact (see Table 3.1.1-5, Table 3.1.1-6, and Table 3.1.1-7).

The proposed project could combine with other future projects anticipated in the vicinity to increase the amount of pollutant emissions within the SDAB. Because the SDAB is currently in nonattainment of CAAQS for O_3, PM_{10}, and $PM_{2.5}$, cumulative development has the potential to perpetuate or worsen this excess of standards. However, cumulative development is subject to the plans and control measures presented in the RAQS, which is updated to incorporate land use projections for the County and other local jurisdictions. Projects that propose new development that is consistent with the growth anticipated in land use plans used in the projections are generally consistent with the RAQS. The project does not include residential development or large local or regional employment centers, and thus would not result in significant population or employment growth. Therefore, implementation of the project would be consistent with the RAQS and would not result in cumulatively significant impacts.

Project-related construction emissions are significantly below the levels of significance and would contribute not result in a cumulatively considerable increase of nonattainment pollutants. Thus, impacts would be **less than significant**, and no mitigation would be required.

Cumulatively Considerable Net Increase of Criteria Pollutants (Operation)

Guidelines for the Determination of Significance

The guidelines for the consideration of operational cumulatively considerable net increases are treated differently due to the mobile nature of the emissions. The SDAB's RAQS, based on growth projections derived from the allowed General Plan densities, are updated every 3 years by SDAPCD and lay out the programs for attaining the CAAQS and NAAQS for O_3 precursors. It is assumed that a project that conforms to the County's General Plan and does not have emissions exceeding the screening-level thresholds, would not create a cumulatively considerable net increase to O_3 since the emissions were accounted for in the RAQS.

The following guidelines for determining significance must be used for determining the cumulatively considerable net increases during the operational phase:

- A project that does not conform to the RAQS and/or has a significant direct impact on air quality with regard to operational emissions of PM_{10}, $PM_{2.5}$, NO_x, and/or VOCs would also have a significant cumulatively considerable net increase.
- Projects that cause road intersections to operate at or below a level of service E (analysis only required when the addition of peak-hour trips from the proposed project and the surrounding projects exceeds 2,000) and create a CO hotspot create a cumulatively considerable net increase of CO.

Analysis

Project operations refers to the full range of activities that can or may generate criteria pollutants, GHGs, and TAC emissions when the project is functioning in its intended use. For projects such as office parks, shopping centers, apartment buildings, residential subdivisions, and other indirect sources, motor vehicles traveling to and from the project represent the primary source of air pollutant emissions. For industrial

projects and some commercial projects, equipment operation and manufacturing processes, i.e., permitted stationary sources, can be of greatest concern from an emissions standpoint. CEQA significance thresholds address the impacts of operational emission sources on local and regional air quality. Thresholds are also provided for other potential impacts related to project operations, such as odors.

The project would be operated remotely and normally unoccupied. Operational emissions of the project would be de minimis, limited to the occasional use of maintenance vehicles and as-needed use of small equipment, e.g., portable utility generators. Operational emissions are not quantified.

Projects that would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (PM_{10}, $PM_{2.5}$, or an exceedance of quantitative thresholds for O_3 precursors, NO_x and VOCs) would be considered as having a potentially significant impact. It is assumed that a project that conforms to the County's General Plan and does not have emissions exceeding the SDAPCD thresholds of significance would not create a cumulatively considerable net increase to O_3 since the emissions were accounted for in the RAQS.

Operational emissions of the project would be minimal and limited to the occasional use of on-road vehicles (about 50 to 100 trips per year) for maintenance of the solar facility. Therefore, the project conforms to the County's General Plan and RAQS. Thus, the project would not create a cumulatively considerable net increase in nonattainment pollutants. No mitigation measures are needed. The project conforms to the County's General Plan and RAQS and would not result in a cumulatively considerable increase of nonattainment pollutants. Thus, the project would result in **less-than-significant impacts**, and no mitigation would be required.

3.1.1.5 Conclusion

The following discussion provides a summary of the conclusions reached in each of the above impact analyses, and the level of impact that would occur after mitigation measures, if any, are implemented. The project would not require mitigation measures because no identified significant impacts were identified relative to air quality.

Conformance to Regional Air Quality Strategy

The project would comply with all SDAPCD rules and regulations results and would be in conformance with SDAPCD air quality plans. Further, the emissions from project construction are below the thresholds of significance; therefore, the project would result in **less-than-significant impacts** without mitigation.

Conformance to Federal and State Ambient Air Quality Standards

Annual, daily, and hourly construction-related air pollutant emissions would not exceed any of the applicable SDAPCD significance thresholds (see Table 3.1.1-5, Table 3.1.1-6, and Table 3.1.1-7). The project would also incorporate dust control practices which would minimize PM_{10} and $PM_{2.5}$ emissions. Operation of the project would result in **less-than-significant impacts** without mitigation.

Impacts to Sensitive Receptors

The short-term construction emissions dispersed over a wide area would not expose sensitive receptors to substantial pollutant concentrations. Additionally, operational emissions of the project would be minimal and therefore, would not expose sensitive receptors to substantial pollutant concentrations. As such, the project would result in **less-than-significant impacts** to sensitive receptors, without mitigation.

Other Emissions

The project would not be a source of any odors during operations. Construction of the project could result in emission of odors from construction equipment and vehicles. However, emissions would disperse rapidly from the project site and diesel exhaust odors would be consistent with existing vehicle odors in the area. Therefore, the project would result in **less-than-significant impacts** with respect to odor levels, without mitigation.

This page intentionally left blank.