

2.1 AIR QUALITY

2.1.1 Setting

Setting information with respect to this issue remains unchanged from the certified Final EIR. Please refer to Section 4.3.1 of the Final EIR for a full description of the air quality setting.

2.1.2 Impact Analysis

a. Methodology and Significance Thresholds. Procedures and guidance regarding the evaluation of air quality impacts associated with land development projects are provided by SLOAPCD's *CEQA Air Quality Handbook* (2012). The significance thresholds are the same as those used in the certified Final EIR, but are repeated in this document for clarity. Differences in methodology are described below.

Methodology. The California Emissions Estimator Model (CalEEMod) version 2016.3.1 was used to estimate regional air pollutant emissions associated with project construction and operation, as it was for the certified Final EIR. However, different phasing assumptions were applied for the SEIR analysis, as summarized below, and more fully described in **Appendix A**, which is a memorandum and related air emission modeling prepared for the revised project by Rincon Consultants.

Consistent with the revised project phasing, this analysis conservatively assumes that all residential and non-residential buildout may occur simultaneously, and considers two potential development scenarios:

1. In Scenario 1, buildout would occur consistent with the construction scenario default developed in the California Emissions Estimator Model (CalEEMod), which is consistent with San Luis Obispo Air Pollution Control District (SLOAPCD) guidelines for projects in the South Central Coast Air Basin (SCCAB).
2. In Scenario 2, all residential and non-residential buildout would occur within a single year.

Rincon estimated criteria pollutant and greenhouse gas (GHG) emissions for the Specific Plan using CalEEMod version 2016.3.¹ CalEEMod construction schedule defaults were used for Scenario 1, except in the case of architectural coating for Scenario 1. For Scenario 2, CalEEMod construction schedule defaults were shortened proportionally to reflect the conservative assumption that the residential and non-residential development would be completed within a single year. Similar to the methodology employed in the emissions modeling in the FEIR, the architectural coating phase for each model run was extended in Scenario 1 and Scenario 2 to overlap with half of the building construction phase because painting is generally completed as

¹ The current version of CalEEMod is 2016.3.2. This analysis uses the previous version 2016.3.1 for consistency with the emissions estimates provided in the certified FEIR. Version 2016.3.2 does not include substantial methodological changes from version 2016.3.1, including emissions factors. Therefore, the results from version 2016.3.1 reflect appropriate and up-to-date methodologies and emissions factors, and results from this version of CalEEMod are appropriate for analyzing project emissions.

buildings within a phase are completed, rather than subsequent to all building construction. Construction assumptions are detailed in the CalEEMod output files (refer to attachment).

All other modeling assumptions included in the original FEIR emissions estimates were incorporated into the revised emissions model runs, including offsite hauling of import soil material, demolition of the existing buildings in the northern area of the project site, estimates of vehicle trips associated with the proposed development, and the open space and park areas' use of reclaimed water. All other values utilized in the emissions modeling were based on applicable SLOAPCD recommended defaults.

The FEIR included mitigation measures intended to reduce temporary construction emissions, and estimated both unmitigated and mitigated criteria pollutant emissions. This analysis includes updated emissions estimates for both the unmitigated and mitigated scenarios.

Significance Thresholds. The following thresholds are based on Appendix G of the *State CEQA Guidelines*. Impacts would be significant if the project would:

1. *Conflict with or obstruct implementation of the applicable air quality plan;*
2. *Violate any air quality standard or contribute substantially to an existing or projected air quality violation;*
3. *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 (including releasing emissions which exceed quantitative guidelines for ozone precursors);*
4. *Expose sensitive receptors to substantial pollutant concentrations; or*
5. *Create objectionable odors affecting a substantial number of people.*

The Initial Study (Appendix A of the certified Final EIR) determined that the project would not create objectionable odors that would affect a substantial number of people, nor would the project expose people to objectionable odors. Therefore, Threshold 5 is not discussed further in this section. See Section 4.14 of the certified Final EIR, *Issues Addressed in the Initial Study*, for a discussion of this issue.

As stated in the *State CEQA Guidelines*, the significance criteria established by the regional air quality management or air quality pollution control district may be relied upon to make determinations. SLOAPCD's recommended significance criteria are described in its *CEQA Air Quality Handbook* (2012) and included below.

Consistency with the 2001 CAP. Projects and programs requiring an analysis of consistency with the CAP include: General Plan updates and amendments, Community Plans, Specific Plans, Area Plans, large residential developments and large commercial/industrial developments. Therefore, the proposed San Luis Ranch Specific Plan Area is evaluated for impacts related to CAP consistency. The *CEQA Air Quality Handbook* (2012) indicates that if a project is consistent with the land use and transportation control measures and strategies outlined in the 2001 CAP, then the project is considered consistent with the 2001 CAP. The 2001 CAP guidance for project consistency analysis states that the following questions should be evaluated:

1. *Are the population projections used in the plan or project equal to or less than those used in the most recent CAP for the same area?*
2. *Is rate of increase in vehicle trips and miles traveled less than or equal to the rate of population growth for the same area?*
3. *Have all applicable land use and transportation control measures from the CAP been included in the plan or project to the maximum extent feasible?*

According to the 2001 CAP, if the answer to all of the above questions is yes, then the project is consistent with the CAP. If the answer to any of the above questions is no, the project is inconsistent with the CAP.

Construction Emissions Thresholds. The SLOAPCD has developed specific daily and quarterly numeric thresholds that apply to projects within the SCCAB. Daily thresholds are for projects that would be completed in less than one quarter (90 days). The SLOAPCD's quarterly construction thresholds are applicable to the proposed project because construction would last for more than one quarter. These include:

ROG and NO_x Emissions

- **Quarterly – Tier 1:** For construction projects lasting more than one quarter, exceedance of the 2.5 tons per quarter threshold requires Standard Mitigation Measures and Best Available Control Technology (BACT) for construction equipment. If implementation of the Standard Mitigation and BACT measures cannot bring the project below the threshold, off-site mitigation may be necessary; and,
- **Quarterly – Tier 2:** For construction projects lasting more than one quarter, exceedance of the 6.3 tons per quarter threshold requires Standard Mitigation Measures, BACT, implementation of a Construction Activity Management Plan (CAMP), and off-site mitigation.

Diesel Particulate Matter (DPM) Emissions

- **Quarterly – Tier 1:** For construction projects lasting more than one quarter, exceedance of the 0.13 tons per quarter threshold requires Standard Mitigation Measures, BACT for construction equipment; and,
- **Quarterly – Tier 2:** For construction projects lasting more than one quarter, exceedance of the 0.32 ton per quarter threshold requires Standard Mitigation Measures, BACT, implementation of a CAMP, and off-site mitigation.

Fugitive Particulate Matter (PM₁₀), Dust Emissions

- **Quarterly:** Exceedance of the 2.5 tons per quarter threshold requires Fugitive PM₁₀ Mitigation Measures and may require the implementation of a CAMP.

Operational Emissions Thresholds. SLOAPCD’s long-term operational emission thresholds are summarized in Table 2.1-1.

Table 2.1-1. SLOAPCD Operational Emissions Significance Thresholds

Pollutant	Threshold	
	Daily	Annual
ROG + NO _x (combined) ¹	25 lbs/day	25 tons/year
Diesel Particulate Matter (DPM) ¹	1.25 lbs/day	---
Fugitive Particulate Matter (PM ₁₀), Dust	25 lbs/day	25 tons/year
CO	550 lbs/day	---

Source: SLOAPCD 2012

1. SLOAPCD specifies that CalEEMod winter emission outputs should be compared to operational thresholds for these pollutants (2012).

b. Project Impacts and Mitigation Measures. This section focuses only on those portions of the impact discussion and related mitigation measures that may have been modified from the certified Final EIR. Unless otherwise described here, the analysis of this issue as well as related conclusions, level of significance, and mitigation measures remain unchanged from the certified Final EIR. Please refer to that document for a full discussion of project-related impacts.

Impact AQ-2 Construction of the project would generate temporary increases in localized air pollutant emissions. Construction emissions of ROG, NO_x, and DPM would exceed SLOAPCD construction thresholds. Impacts would be Class II, less than significant with mitigation incorporated.

Construction of the project would generate temporary emissions of air pollutants. Ozone precursors, NO_x and ROG, as well as DPM (exhaust PM_{2.5} and PM₁₀) would be emitted by the operation of construction equipment, while fugitive dust (PM₁₀) would be emitted by activities that disturb the soil, such as grading and excavation, road construction, and building construction.

Emissions Estimates

The revised construction timing used in Scenario 1 and Scenario 2 does not include any changes to the final buildout of the San Luis Ranch Specific Plan. Therefore, total project emissions, including operational emissions of criteria pollutants and GHGs, would remain unchanged. The primary purpose of the updated criteria pollutant emissions estimates is to evaluate whether annual emissions during Specific Plan construction would change as a result of the revised construction timing, and to assess whether the mitigation measures for project construction

emissions included in the FEIR would remain adequate to reduce temporary construction emissions to a less than significant level.

The maximum quarterly unmitigated construction emissions are shown in Table 2.1-2 (Scenario 1) and Table 2.1-3 (Scenario 2). These tables are an update of Table 4.3-6 from the certified FEIR.

Table 2.1-2. Scenario 1: Unmitigated Maximum Quarterly Construction Emissions

Construction Year	Maximum Quarter Per Year (tons/quarter) ¹		
	ROG + NO _x	Diesel Particulate Matter	Dust
2019	4.30	0.14	0.38
2020	3.52	0.10	0.45
2021	1.59	0.07	0.28
2022	1.50	0.06	0.27
2023	3.03	0.05	0.29
2024	2.96	0.05	0.32
2025	2.90	0.04	0.32
2026	2.46	0.02	0.07
Maximum tons/quarter	4.30	0.14	0.45
<i>SLOAPCD Quarterly Tier 1 Thresholds (tons/quarter)</i>	2.5	0.13	2.5
Threshold Exceeded?	Yes	Yes	No
<i>SLOAPCD Quarterly Tier 2 Thresholds (tons/quarter)</i>	6.3	0.32	2.5
Threshold Exceeded?	No	No	No

Notes: All calculations were made using CalEEMod. See attachment for model results. Diesel Particulate Matter (DPM) is equal to combined exhaust PM₁₀ and PM_{2.5}, and dust is equal to fugitive PM₁₀ from CalEEMod.

1. CalEEMod calculates quarterly emissions of ROG+NO_x, but does not generate quarterly emissions for DPM and dust; therefore, maximum annual construction emissions of DPM and dust were divided by the number of quarters undergoing construction in a year to estimate maximum quarterly emissions.

As shown in Table 2.1-2, the maximum quarterly combined ROG and NO_x emissions under Scenario 1 would exceed SLOAPCD’s Quarterly Tier 1 threshold, but would not exceed the Tier 2 threshold. The project’s diesel particulate matter (DPM) emissions under Scenario 1 would exceed the Tier 1 threshold, but would not exceed the Tier 2 threshold. The project’s dust emissions under Scenario 1 would not exceed Tier 1 or 2 thresholds. These results are generally consistent with, but slightly reduced, in comparison to the results shown in Table 4.3-6 from the certified FEIR, which identified combined ROG and NO_x emissions above the Tier 2 threshold. The reduction in quarterly emissions is due to the later start of project construction (year 2019, versus year 2017 in the FEIR), which results in lower default equipment emission rates due to the increasing use of newer, cleaner construction equipment.

Table 2.1-3. Scenario 2: Unmitigated Maximum Quarterly Construction Emissions

Construction Year	Maximum Quarter Per Year (tons/quarter) ¹		
	ROG + NO _x	Diesel Particulate Matter	Dust
2019	15.21	0.73	0.35
Maximum tons/quarter	15.21	0.73	0.35
<i>SLOAPCD Quarterly Tier 1 Thresholds (tons/quarter)</i>	2.5	0.13	2.5
Threshold Exceeded?	Yes	Yes	No
<i>SLOAPCD Quarterly Tier 2 Thresholds (tons/quarter)</i>	6.3	0.32	2.5
Threshold Exceeded?	Yes	Yes	No

Notes: All calculations were made using CalEEMod. See attachment for model results. DPM is equal to combined exhaust PM₁₀ and PM_{2.5}, and dust is equal to fugitive PM₁₀ from CalEEMod.

1. CalEEMod calculates quarterly emissions of ROG+NO_x, but does not generate quarterly emissions for DPM and dust; therefore, maximum annual construction emissions of DPM and dust were divided by the number of quarters undergoing construction in a year to estimate maximum quarterly emissions.

As shown in Table 2.1-3, the project’s maximum quarterly combined ROG and NO_x emissions under Scenario 2 would exceed SLOAPCD’s Quarterly Tier 1 and Tier 2 thresholds. The project’s DPM emissions under Scenario 2 would exceed Tier 1 and 2 thresholds. The project’s dust emissions under Scenario 2 would not exceed Tier 1 or 2 thresholds. These results are higher than the results shown in Table 4.3-6 from the FEIR, which identified combined ROG and NO_x emissions slightly above the Tier 2 threshold, and DPM emissions below the Tier 2 threshold. The increase in quarterly emissions is due to the compression of all anticipated construction activity within a shorter overall schedule (one year, versus five years in the FEIR).

For either scenario, impacts are considered **Class II**, significant but mitigable.

Mitigation Measures. Consistent with the findings of the certified FEIR, Mitigation Measures AQ-2(a) through AQ-2(e) are required for the worst-case scenario (Scenario 2, where all development occurs in a single year) to reduce construction emissions of ROG, NO_x, and DPM:

- **AQ-2(a) Fugitive Dust Control Measures**
- **AQ-2(b) Standard Control Measures for Construction Equipment**
- **AQ-2(c) Best Available Control Technology (BACT) for Construction Equipment**
- **AQ-2(d) Architectural Coating**
- **AQ-2(e) Construction Activity Management Plan**

The revised project's maximum quarterly emissions with implementation of Tier 3 off-road engine compliance and level 2 diesel particulate filters required by Mitigation Measure AQ-2(c), as well as low VOC-emission paint required by Mitigation Measure AQ-2(d) are shown in Table 2.1-2 (Scenario 1) and Table 2.1-3 (Scenario 2). These tables are an update of Table 4.3-7 from the FEIR.

For clarity, all relevant mitigation measures for this impact from the certified Final EIR are included in their entirety below.

AQ-2(a) Fugitive Dust Control Measures. Construction projects shall implement the following dust control measures so as to reduce PM₁₀ emissions in accordance with SLOAPCD requirements.

- Reduce the amount of the disturbed area where possible;
- Water trucks or sprinkler systems shall be used during construction in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency shall be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water or a SLOAPCD-approved dust suppressant shall be used whenever possible, to reduce the amount of potable water used for dust control;
- All dirt stock pile areas shall be sprayed daily as needed;
- Permanent dust control measures identified in the approved project revegetation and landscape plans shall be implemented as soon as possible following completion of any soil disturbing activities;
- Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading shall be sown with a fast germinating, non-invasive grass seed and watered until vegetation is established;
- All disturbed soil areas not subject to revegetation shall be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD;
- All roadways, driveways, sidewalks, etc. to be paved shall be completed as soon as possible after grading unless seeding or soil binders are used;
- Vehicle speed for all construction vehicles shall not exceed 15 mph on any unpaved surface at the construction site;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or shall maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code Section 23114;
- Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site;

- Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water shall be used where feasible;
- All of these fugitive dust mitigation measures shall be shown on grading and building plans; and
- The contractor or builder shall designate a person or persons to monitor the fugitive dust emissions and enhance the implementation of the measures as necessary to minimize dust complaints, reduce visible emissions below 20 percent opacity, and to prevent transport of dust offsite. Their duties shall include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SLOAPCD Compliance Division prior to the start of any grading, earthwork or demolition.

AQ-2(b) Standard Control Measures for Construction Equipment. The following standard air quality mitigation measures shall be implemented during construction activities at the project site:

- Maintain all construction equipment in proper tune according to manufacturer's specifications;
- Fuel all off-road and portable diesel powered equipment with ARB certified motor vehicle diesel fuel (non-taxed version suitable for use off-road);
- Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines, and comply with the State Off-Road Regulation;
- Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines, and comply with the State On-Road Regulation;
- Construction or trucking companies with fleets that do not have engines in their fleet that meet the engine standards identified in the above two measures (e.g. captive or NO_x exempt area fleets) may be eligible by proving alternative compliance;
- On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:
 1. Shall not idle the vehicle's primary diesel engine for greater than 5-minutes at any location, except as noted in Subsection (d) of the regulation; and,
 2. Shall not operate a diesel-fueled auxiliary power system (APS) to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a

sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

- Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-Road Diesel regulation.
- Signs shall be posted in the designated queuing areas and or job sites to remind drivers and operators of the 5 minute idling limit;
- In addition to the state required diesel idling requirements, the project applicant shall comply with these more restrictive requirements to minimize impacts to nearby sensitive receptors:
 1. Signs that specify the no idling areas shall be posted and enforced at the site.
 2. Diesel idling within 1,000 feet of sensitive receptors is not permitted;
 3. Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors;
 4. Use of alternative fueled equipment is recommended;
- Electrify equipment when feasible;
- Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and
- Use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel.

AQ-2(c) Best Available Control Technology (BACT) for Construction Equipment. The following BACT for diesel-fueled construction equipment shall be implemented during construction activities at the project site, where feasible:

- Further reducing emissions by expanding use of Tier 3 and Tier 4 off-road and 2010 on-road compliant engines where feasible;
- Repowering equipment with the cleanest engines available; and
- Installing California Verified Diesel Emission Control Strategies, such as level 2 diesel particulate filters. These strategies are listed at:
<http://www.arb.ca.gov/diesel/verdev/vt/cvt.htm>

AQ-2(d) Architectural Coating. To reduce ROG and NO_x levels during the architectural coating phase, low or no VOC-emission paint shall be used with levels of 50 g/L or less.

AQ-2(e) Construction Activity Management Plan. Emissions reduction measures and construction practices required to comply with Mitigation Measures AQ-2(a) through AQ-2(d) shall be documented in a Construction Activity Management Plan (CAMP) and submitted to SLOAPCD for review and approval at least three months before the start of construction. The CAMP shall include a Dust Control Management Plan, tabulation of on and off-road construction equipment (age, horse-power and miles and/or hours of operation), construction truck trip schedule, construction work-day period, and construction phasing. If implementation of the Standard Mitigation and Best Available Control Technology measures cannot bring the project below the Tier 1 threshold (2.5 tons of NO_x+ROG per quarter), off-site mitigation shall be implemented in coordination with SLOAPCD to reduce NO_x and ROG emissions to below the Tier 1 threshold.

Significance After Mitigation. According to the SLOAPCD *CEQA Air Quality Handbook*, if estimated construction emissions are expected to exceed either of the SLOAPCD Quarterly Tier 2 thresholds of significance after the standard and BACT measures are factored into the estimation, then an SLOAPCD approved Construction Activity Management Plan (CAMP) and offsite mitigation need to be implemented in order to reduce potential air quality impacts to a less than significant level. If construction emissions do not exceed Tier 2 thresholds with implementation of standard and BACT measures, SLOAPCD considers emissions less than significant, even if Tier 1 thresholds continue to be exceeded.

Tables 2.1-4 and 2.1-5 show the post-mitigation construction emissions associated with each development phasing scenario.

Table 2.1-4. Scenario 1: Mitigated Maximum Quarterly Construction Emissions

Construction Year	Maximum Quarter Per Year (tons/quarter) ¹		
	ROG + NO _x	Diesel Particulate Matter	Dust
2019	3.40	0.04	0.21
2020	2.87	0.05	0.35
2021	1.48	0.04	0.28
2022	1.42	0.04	0.27
2023	1.69	0.04	0.29
2024	1.66	0.04	0.32
2025	1.63	0.04	0.32
2026	1.24	0.02	0.07
Total	3.40	0.05	0.35
<i>SLOAPCD Quarterly Tier 1 Thresholds (tons/quarter)</i>	2.5	0.13	2.5
Threshold Exceeded?	Yes	No	No

<i>SLOAPCD Quarterly Tier 2 Thresholds (tons/quarter)</i>	6.3	0.32	2.5
Threshold Exceeded?	No	No	No

Notes: All calculations were made using CalEEMod. See attachment for model results. DPM is equal to combined exhaust PM₁₀ and PM_{2.5}, and dust is equal to fugitive PM₁₀ from CalEEMod.

1. CalEEMod calculates quarterly emissions of ROG+NO_x, but does not generate quarterly emissions for DPM and dust; therefore, maximum annual construction emissions of DPM and dust were divided by the number of quarters undergoing construction in a year to estimate maximum quarterly emissions.

As shown in Table 2.1-4, with implementation of Mitigation Measures AQ-2(c) and AQ-2(d), construction emissions under Scenario 1 would not exceed any of the SLOAPCD Quarterly Tier 2 thresholds of significance. Therefore, consistent with the findings of the FEIR, implementation of a Construction Activity Management Plan (CAMP) and offsite mitigation would not be required under this scenario, and impacts would be less than significant with mitigation.

Table 2.1-5. Scenario 2: Mitigated Maximum Quarterly Construction Emissions

Construction Year	Maximum Quarter Per Year (tons/quarter) ¹		
	ROG + NO _x	Diesel Particulate Matter	Dust
2019	10.63	0.27	0.32
Total	10.63	0.27	0.32
<i>SLOAPCD Quarterly Tier 1 Thresholds (tons/quarter)</i>	2.5	0.13	2.5
Threshold Exceeded?	Yes	Yes	No
<i>SLOAPCD Quarterly Tier 2 Thresholds (tons/quarter)</i>	6.3	0.32	2.5
Threshold Exceeded?	Yes	No	No

Notes: All calculations were made using CalEEMod. See attachment for model results. DPM is equal to combined exhaust PM₁₀ and PM_{2.5}, and dust is equal to fugitive PM₁₀ from CalEEMod.

1. CalEEMod calculates quarterly emissions of ROG+NO_x, but does not generate quarterly emissions for DPM and dust; therefore, maximum annual construction emissions of DPM and dust were divided by the number of quarters undergoing construction in a year to estimate maximum quarterly emissions.

As shown in Table 2.1-5, with implementation of Mitigation Measures AQ-2(c) and AQ-2(d), construction emissions under Scenario 2 would not exceed the SLOAPCD Quarterly Tier 2 thresholds of significance for DPM or dust. However, emissions of ROG + NO_x would exceed the Tier 2 threshold of 6.3 tons/quarter. Therefore, implementation of a CAMP pursuant to Mitigation Measure AQ-2(e) would be required, and offsite mitigation may be necessary to reduce impacts to a less than significant level. Off-site mitigation, if required, must be consistent with SLOAPCD guidelines (refer to Section 2.3.3 of the *CEQA Air Quality Handbook*). Consistent with these guidelines, the project applicant and/or developers of individual projects within the Specific Plan area would be required to:

- coordinate with SLOAPCD to provide funding for off-site emission reduction measures to reduce emissions to below daily threshold levels;

- coordinate with SLOAPCD to provide funding for off-site emissions reduction measures prior to issuance of grading permits; and
- submit proof that emissions have been reduced to below daily threshold levels to the Community Development Department.

For the purpose of this SEIR analysis, the more restrictive conclusions and mitigation requirements of Scenario 2 are assumed to apply. However, if actual development occurs more consistent with what is presented in Scenario 1, mitigation requirements would be potentially reduced and modified accordingly.

Other Final Environmental Impact Report Air Quality Impacts

As described above, the revised construction timing does not include any changes to the overall buildout of the San Luis Ranch Specific Plan. Nonetheless, SLOAPCD requires any project with grading areas greater than 4.0 acres or that are within 1,000 feet of any sensitive receptor to implement standard fugitive dust mitigation measures. Therefore, the FEIR conclusions with regard to Impacts AQ-1, AQ-3, AQ-4, and potential cumulative air quality would not change as a result of the revised Specific Plan construction timing. These potential air quality impacts are discussed briefly below.

- **Impact AQ-1: Clean Air Plan consistency.** As described in the FEIR, the Specific Plan would be inconsistent with the SLOAPCD 2001 Clean Air Plan because it would result in an increase in vehicle miles traveled (VMT) that would exceed the rate of population growth. Mitigation Measure AQ-1, *Encourage Telecommuting*, as well as Mitigation Measure AQ-3(a) and AQ-3(b) described below, would reduce regional air pollutant emissions and ensure that the project would be consistent with the Clean Air Plan transportation control measures and land use strategies. However, mitigation is not available that would reduce projected VMT such that the project's vehicle trip rate increase would not exceed population growth in the region. Therefore, impacts related to consistency with the 2001 Clean Air Plan would remain significant and unavoidable (**Class I**), consistent with the findings of the FEIR.
- **Impact AQ-3: Long-term operational emissions.** Total project emissions, including operational emissions of criteria pollutants, would remain unchanged. Mitigation Measures AQ-3(a), *Standard Operational Mitigation Measures*, and AQ-3(b), *Offsite Mitigation*, would reduce impacts to regional air quality below SLOAPCD's annual operational thresholds. Therefore, long-term operational air quality impacts would be less than significant with mitigation (**Class II**), consistent with the findings of the FEIR.
- **Impact AQ-4: Exposure of sensitive receptors to substantial pollutant concentrations.** The FEIR did not identify impacts to sensitive receptors associated with construction activity, and as discussed above, short-term construction emissions would be generally consistent with, and somewhat lower than, those identified in the FEIR. The primary sources of toxic air contaminant emissions identified in the FEIR were vehicle trips on area roadways and industrial uses. The revised construction timing would not increase exposure of sensitive receptors to either of these sources. Therefore, potential impacts from exposure of sensitive receptors to substantial pollutant concentrations would remain less than significant (**Class III**), consistent with the findings of the FEIR.

- **Cumulative Air Quality Impacts.** As described in the FEIR, a project that exceeds applicable SLOAPCD significance thresholds or is found to be inconsistent with the Clean Air Plan would result in significant cumulative impacts. As discussed under Impacts AQ-1 through and AQ-3, the project is inconsistent with the 2001 Clean Air Plan and would exceed SLOAPCD construction and operational thresholds. The revised construction timing would not reduce these identified impacts. Therefore, cumulative impacts on air quality would remain significant and unavoidable (**Class I**), consistent with the findings of the FEIR.