

AIR QUALITY and GHG IMPACT ANALYSIS

TTM 37803

PERRIS, CALIFORNIA

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PROJECT DESCRIPTION

The approximate 53.13 gross-acre project site is located at the southwest corner of Metz Road and A Street in the City of Perris in Riverside County. The site is vacant with some native vegetation and numerous rock outcroppings throughout the site. The project applicant is proposing the development of 145 single-family detached residential units. There are two points of site access including an entry at Metz Road on the north and San Jacinto Avenue on the south. The project would require approximately 946,211 cubic yards of cut and 946,211 cubic yards of fill and will balance on site. The project would be completed in approximately three years.

ATMOSPHERIC SETTING

The climate of the Perris area, technically called an interior valley sub-climate of Southern California's semi-arid climate, is characterized by warm summers, mild winters, infrequent rainfall, moderate afternoon breezes, and generally fair weather. The clouds and the fog that form along the region's coastline rarely extend as far inland as the San Jacinto Valley, and if they do, they usually burn off quickly after sunrise. The most important weather pattern is associated with the warm season airflow across populated areas of the Los Angeles Basin that brings polluted air into western Riverside County late in the afternoon. This transport pattern creates unhealthy air quality when the fringes of this "urban smog cloud" extend to the project site during the summer months.

Temperatures in the Perris area average a very comfortable 65°F year-round, with warm summer afternoons (95+ degrees) and often cool winter mornings (35 degrees). Rainfall in the project area can vary considerably in both time and space. Almost all the annual rainfall comes from the fringes of mid-latitude storms from late November to early April with summers often completely dry. Rainfall in the area averages 12.5 inches per year, but varies markedly from one year to the next.

Winds are an important factor in characterizing the local air quality environment because they both determine the regional pattern of air pollution transport and control the local rate of pollution dispersion. Daytime winds are from the NW at 5-7 mph as air moves regionally onshore from the cool Pacific Ocean to the warm Mojave Desert interior of Southern California. These winds allow for good local mixing, but they may bring air pollutants from urbanized coastal areas into interior valleys. Strong thermal convection in the summer ultimately dilutes the smog cloud from urbanized development, but the project area cannot completely escape the regional air quality degradation.

Light nocturnal winds result mainly from drainage of cool air off mountains east and south of the San Jacinto Valley toward the valley floor. Such winds are characterized by stagnation and poor local mixing. However, the origin of these winds in unpopulated mountain areas does not generally impair air quality.

In addition to winds that control the rate and direction of pollution dispersal, Southern California is notorious for strong temperature inversions that limit the vertical depth through which pollution can be mixed. In summer, coastal areas are characterized by a sharp discontinuity between the cool marine air at the surface and the warm, sinking air aloft within the high pressure cell over the

ocean to the west. This marine/subsidence inversion allows for good local mixing, but acts like a giant lid over the basin. A second inversion type forms on clear winter nights when cold air off the mountains sinks to the valley floor while the air aloft over the valley remains warm. This forms radiation inversions. These inversions, in conjunction with calm winds, trap pollutants such as automobile exhaust near their source. While these inversions may lead to air pollution "hot spots" in heavily developed coastal areas of the basin, there is not enough traffic in inland valleys to cause any winter air pollution problems. Thus, while summers are periods of hazy visibility and occasionally unhealthful air, winter is often a period of spectacular visibility and excellent air quality in the project area.

AIR QUALITY SETTING

AMBIENT AIR QUALITY STANDARDS (AAQS)

In order to gauge the significance of the air quality impacts of the proposed project, those impacts, together with existing background air quality levels, must be compared to the applicable ambient air quality standards. These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise, called "sensitive receptors." Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed. Recent research has shown, however, that chronic exposure to ozone (the primary ingredient in photochemical smog) may lead to adverse respiratory health even at concentrations close to the ambient standard.

National AAQS were established in 1971 for six pollution species with states retaining the option to add other pollutants, require more stringent compliance, or to include different exposure periods. The initial attainment deadline of 1977 was extended several times in air quality problem areas like Southern California. In 2003, the Environmental Protection Agency (EPA) adopted a rule, which extended and established a new attainment deadline for ozone for the year 2021. Because the State of California had established AAQS several years before the federal action and because of unique air quality problems introduced by the restrictive dispersion meteorology, there is considerable difference between state and national clean air standards. Those standards currently in effect in California are shown in Table 1. Sources and health effects of various pollutants are shown in Table 2.

The Federal Clean Air Act Amendments (CAAA) of 1990 required that the U.S. Environmental Protection Agency (EPA) review all national AAQS in light of currently known health effects. EPA was charged with modifying existing standards or promulgating new ones where appropriate. EPA subsequently developed standards for chronic ozone exposure (8+ hours per day) and for very small diameter particulate matter (called "PM-2.5"). New national AAQS were adopted in 1997 for these pollutants.

Planning and enforcement of the federal standards for PM-2.5 and for ozone (8-hour) were challenged by trucking and manufacturing organizations. In a unanimous decision, the U.S.

Table 1

Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards ¹		National Standards ²		
		Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷
Ozone (O ₃) ⁸	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m ³)		0.070 ppm (137 µg/m ³)		
Respirable Particulate Matter (PM10) ⁹	24 Hour	50 µg/m ³	Gravimetric or Beta Attenuation	150 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m ³		—		
Fine Particulate Matter (PM2.5) ⁹	24 Hour	—	—	35 µg/m ³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m ³	Gravimetric or Beta Attenuation	12.0 µg/m ³	15 µg/m ³	
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m ³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m ³)	—	Non-Dispersive Infrared Photometry (NDIR)
	8 Hour	9.0 ppm (10 mg/m ³)		9 ppm (10 mg/m ³)	—	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)		—	—	
Nitrogen Dioxide (NO ₂) ¹⁰	1 Hour	0.18 ppm (339 µg/m ³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m ³)	—	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m ³)		0.053 ppm (100 µg/m ³)	Same as Primary Standard	
Sulfur Dioxide (SO ₂) ¹¹	1 Hour	0.25 ppm (655 µg/m ³)	Ultraviolet Fluorescence	75 ppb (196 µg/m ³)	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3 Hour	—		—	0.5 ppm (1300 µg/m ³)	
	24 Hour	0.04 ppm (105 µg/m ³)		0.14 ppm (for certain areas) ¹¹	—	
	Annual Arithmetic Mean	—		0.030 ppm (for certain areas) ¹¹	—	
Lead ^{12,13}	30 Day Average	1.5 µg/m ³	Atomic Absorption	—	—	High Volume Sampler and Atomic Absorption
	Calendar Quarter	—		1.5 µg/m ³ (for certain areas) ¹²	Same as Primary Standard	
	Rolling 3-Month Average	—		0.15 µg/m ³		
Visibility Reducing Particles ¹⁴	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m ³	Ion Chromatography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Ultraviolet Fluorescence			
Vinyl Chloride ¹²	24 Hour	0.01 ppm (26 µg/m ³)	Gas Chromatography			

See footnotes on next page ...

For more information please call ARB-PIO at (916) 322-2990

California Air Resources Board (5/4/16)

Table 1 (continued)

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above $150 \mu\text{g}/\text{m}^3$ is equal to or less than one. For PM2.5, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.
5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
7. Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
8. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
9. On December 14, 2012, the national annual PM2.5 primary standard was lowered from $15 \mu\text{g}/\text{m}^3$ to $12.0 \mu\text{g}/\text{m}^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at $35 \mu\text{g}/\text{m}^3$, as was the annual secondary standard of $15 \mu\text{g}/\text{m}^3$. The existing 24-hour PM10 standards (primary and secondary) of $150 \mu\text{g}/\text{m}^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
10. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
11. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
12. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
13. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ($1.5 \mu\text{g}/\text{m}^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
14. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

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Table 2
Health Effects of Major Criteria Pollutants

Pollutants	Sources	Primary Effects
Carbon Monoxide (CO)	<ul style="list-style-type: none"> • Incomplete combustion of fuels and other carbon-containing substances, such as motor exhaust. • Natural events, such as decomposition of organic matter. 	<ul style="list-style-type: none"> • Reduced tolerance for exercise. • Impairment of mental function. • Impairment of fetal development. • Death at high levels of exposure. • Aggravation of some heart diseases (angina).
Nitrogen Dioxide (NO ₂)	<ul style="list-style-type: none"> • Motor vehicle exhaust. • High temperature stationary combustion. • Atmospheric reactions. 	<ul style="list-style-type: none"> • Aggravation of respiratory illness. • Reduced visibility. • Reduced plant growth. • Formation of acid rain.
Ozone (O ₃)	<ul style="list-style-type: none"> • Atmospheric reaction of organic gases with nitrogen oxides in sunlight. 	<ul style="list-style-type: none"> • Aggravation of respiratory and cardiovascular diseases. • Irritation of eyes. • Impairment of cardiopulmonary function. • Plant leaf injury.
Lead (Pb)	<ul style="list-style-type: none"> • Contaminated soil. 	<ul style="list-style-type: none"> • Impairment of blood function and nerve construction. • Behavioral and hearing problems in children.
Respirable Particulate Matter (PM-10)	<ul style="list-style-type: none"> • Stationary combustion of solid fuels. • Construction activities. • Industrial processes. • Atmospheric chemical reactions. 	<ul style="list-style-type: none"> • Reduced lung function. • Aggravation of the effects of gaseous pollutants. • Aggravation of respiratory and cardio respiratory diseases. • Increased cough and chest discomfort. • Soiling. • Reduced visibility.
Fine Particulate Matter (PM-2.5)	<ul style="list-style-type: none"> • Fuel combustion in motor vehicles, equipment, and industrial sources. • Residential and agricultural burning. • Industrial processes. • Also, formed from photochemical reactions of other pollutants, including NO_x, sulfur oxides, and organics. 	<ul style="list-style-type: none"> • Increases respiratory disease. • Lung damage. • Cancer and premature death. • Reduces visibility and results in surface soiling.
Sulfur Dioxide (SO ₂)	<ul style="list-style-type: none"> • Combustion of sulfur-containing fossil fuels. • Smelting of sulfur-bearing metal ores. • Industrial processes. 	<ul style="list-style-type: none"> • Aggravation of respiratory diseases (asthma, emphysema). • Reduced lung function. • Irritation of eyes. • Reduced visibility. • Plant injury. • Deterioration of metals, textiles, leather, finishes, coatings, etc.

Source: California Air Resources Board, 2002.

Supreme Court ruled that EPA did not require specific congressional authorization to adopt national clean air standards. The Court also ruled that health-based standards did not require preparation of a cost-benefit analysis. The Court did find, however, that there was some inconsistency between existing and "new" standards in their required attainment schedules. Such attainment-planning schedule inconsistencies centered mainly on the 8-hour ozone standard. EPA subsequently agreed to downgrade the attainment designation for a large number of communities to "non-attainment" for the 8-hour ozone standard.

Evaluation of the most current data on the health effects of inhalation of fine particulate matter prompted the California Air Resources Board (ARB) to recommend adoption of the statewide PM-2.5 standard that is more stringent than the federal standard. This standard was adopted in 2002. The State PM-2.5 standard is more of a goal in that it does not have specific attainment planning requirements like a federal clean air standard, but only requires continued progress towards attainment.

Similarly, the ARB extensively evaluated health effects of ozone exposure. A new state standard for an 8-hour ozone exposure was adopted in 2005, which aligned with the exposure period for the federal 8-hour standard. The California 8-hour ozone standard of 0.07 ppm is more stringent than the federal 8-hour standard of 0.075 ppm. The state standard, however, does not have a specific attainment deadline. California air quality jurisdictions are required to make steady progress towards attaining state standards, but there are no hard deadlines or any consequences of non-attainment. During the same re-evaluation process, the ARB adopted an annual state standard for nitrogen dioxide (NO₂) that is more stringent than the corresponding federal standard, and strengthened the state one-hour NO₂ standard.

As part of EPA's 2002 consent decree on clean air standards, a further review of airborne particulate matter (PM) and human health was initiated. A substantial modification of federal clean air standards for PM was promulgated in 2006. Standards for PM-2.5 were strengthened, a new class of PM in the 2.5 to 10 micron size was created, some PM-10 standards were revoked, and a distinction between rural and urban air quality was adopted. In December, 2012, the federal annual standard for PM-2.5 was reduced from 15 µg/m³ to 12 µg/m³ which matches the California AAQS. The severity of the basin's non-attainment status for PM-2.5 may be increased by this action and thus require accelerated planning for future PM-2.5 attainment.

In response to continuing evidence that ozone exposure at levels just meeting federal clean air standards is demonstrably unhealthful, EPA had proposed a further strengthening of the 8-hour standard. A new 8-hour ozone standard was adopted in 2015 after extensive analysis and public input. The adopted national 8-hour ozone standard is 0.07 ppm which matches the current California standard. It will require three years of ambient data collection, then 2 years of non-attainment findings and planning protocol adoption, then several years of plan development and approval. Final air quality plans for the new standard are likely to be adopted around 2022. Ultimate attainment of the new standard in ozone problem areas such as Southern California might be after 2025.

In 2010 a new federal one-hour primary standard for nitrogen dioxide (NO₂) was adopted. This standard is more stringent than the existing state standard. Based upon air quality monitoring data

in the South Coast Air Basin, the California Air Resources Board has requested the EPA to designate the basin as being in attainment for this standard. The federal standard for sulfur dioxide (SO₂) was also recently revised. However, with minimal combustion of coal and mandatory use of low sulfur fuels in California, SO₂ is typically not a problem pollutant.

BASELINE AIR QUALITY

There are no baseline air quality data available directly from the proposed project site. Long-term air quality monitoring for ozone, nitrogen oxides, and 10-micron diameter particulate matter (PM-10) is carried out by the South Coast Air Quality Management District (SCAQMD) at Perris, but the closest data resource for some gaseous and/or particulate species is in Riverside. Table 3 summarizes the last four years of monitoring data from a composite of available data resources.

- a. Photochemical smog (ozone) levels occasionally exceed standards. The 8-hour state ozone standard has been exceeded 17 percent of all days, the 1-hour state standard has been exceeded 8 percent of all days. The 8-hour federal standard has been exceeded 11 percent of all days in the past four years. While ozone levels are still high, they are much lower than 10 to 20 years ago. Attainment of all clean air standards in the project vicinity is not likely to occur soon, but the severity and frequency of violations is expected to continue to slowly decline during the current decade
- b. Carbon monoxide measurements at the Riverside Rubidoux station fluctuate but the maximum 8-hour CO levels at the closest air monitoring station are less than the 25 percent of their most stringent standards because of continued vehicular improvements. These data suggest that baseline CO levels in the project area are generally healthful and can accommodate a reasonable level of additional traffic emissions before any adverse air quality effects would be expected.
- c. Respirable dust (PM-10) levels exceed the state standard on approximately 9 percent of measurement days, but the less stringent federal PM-10 standard has not been violated once for the same period. Particulate levels have traditionally been high in Riverside County because of agricultural activities, dry soil conditions and upwind industrial development
- d. A substantial fraction of PM-10 is comprised of ultra-small diameter particulates capable of being inhaled into deep lung tissue (PM-2.5). Less than two percent of all days exceeded the current national 24-hour standard of 35 µg/m³ from 2015-2018. However, both the frequency of violations of particulate standards, as well as high percentage of PM-2.5, are air quality concerns in the project area.

Although complete attainment of every clean air standard is not yet imminent, extrapolation of the steady improvement trend suggests that such attainment could occur within the reasonably near future.

Table 3
Air Quality Monitoring Summary (2015-2018)
(Number of Days Standards Were Exceeded, and
Maximum Levels During Such Violations)
(Entries shown as ratios = samples exceeding standard/samples taken)

Pollutant/Standard	2015	2016	2017	2018
Ozone				
1-Hour > 0.09 ppm (S)	25	23	33	31
8-Hour > 0.07 ppm (S)	49	55	80	67
8- Hour > 0.075 ppm (F)	31	30	52	47
Max. 1-Hour Conc. (ppm)	0.124	0.131	0.120	0.117
Max. 8-Hour Conc. (ppm)	0.102	0.098	0.105	0.103
Carbon Monoxide				
1-Hour > 20. ppm (S)	0	0	0	0
1-Hour > 9. ppm (S, F)	0	0	0	0
Max 8-Hour Conc. (ppm)	1.6	1.4	1.7	2.0
Nitrogen Dioxide				
Max. 1-Hour Conc. (ppm)	0.019	0.064	0.063	0.055
Inhalable Particulates (PM-10)				
24-Hour > 50 µg/m ³ (S)	3/57	5/57	11/59	3/60
24-Hour > 150 µg/m ³ (F)	0/57	0/57	0/59	0/60
Max. 24-Hr. Conc. (µg/m ³)	74.	76.	75.	64.
Ultra-Fine Particulates (PM-2.5)				
24-Hour > 35 µg/m ³ (F)	9/341	4/357	6/353	2/354
Max. 24-Hr. Conc. (µg/m ³)	54.7	39.1	50.3	64.8

S=State Standard

F=Federal Standard

Source: South Coast AQMD

Perris Air Monitoring Station- Ozone and PM-10

Rubidoux Air Monitoring Station – Carbon Monoxide, Nitrogen Dioxide and PM-2.5

AIR QUALITY PLANNING

The Federal Clean Air Act (1977 Amendments) required that designated agencies in any area of the nation not meeting national clean air standards must prepare a plan demonstrating the steps that would bring the area into compliance with all national standards. The SCAB could not meet the deadlines for ozone, nitrogen dioxide, carbon monoxide, or PM-10. In the SCAB, the agencies designated by the governor to develop regional air quality plans are the SCAQMD and the Southern California Association of Governments (SCAG). The two agencies first adopted an Air Quality Management Plan (AQMP) in 1979 and revised it several times as earlier attainment forecasts were shown to be overly optimistic.

The 1990 Federal Clean Air Act Amendment (CAAA) required that all states with air-sheds with “serious” or worse ozone problems submit a revision to the State Implementation Plan (SIP). Amendments to the SIP have been proposed, revised and approved over the past decade. The most current regional attainment emissions forecast for ozone precursors (ROG and NO_x) and for carbon monoxide (CO) and for particulate matter are shown in Table 4. Substantial reductions in emissions of ROG, NO_x and CO are forecast to continue throughout the next several decades. Unless new particulate control programs are implemented, PM-10 and PM-2.5 are forecast to slightly increase.

The Air Quality Management District (AQMD) adopted an updated clean air “blueprint” in August 2003. The 2003 Air Quality Management Plan (AQMP) was approved by the EPA in 2004. The AQMP outlined the air pollution measures needed to meet federal health-based standards for ozone by 2010 and for particulates (PM-10) by 2006. The 2003 AQMP was based upon the federal one-hour ozone standard which was revoked late in 2005 and replaced by an 8-hour federal standard. Because of the revocation of the hourly standard, a new air quality planning cycle was initiated.

With re-designation of the air basin as non-attainment for the 8-hour ozone standard, a new attainment plan was developed. This plan shifted most of the one-hour ozone standard attainment strategies to the 8-hour standard. As previously noted, the attainment date was to “slip” from 2010 to 2021. The updated attainment plan also includes strategies for ultimately meeting the federal PM-2.5 standard.

Because projected attainment by 2021 required control technologies that did not exist yet, the SCAQMD requested a voluntary “bump-up” from a “severe non-attainment” area to an “extreme non-attainment” designation for ozone. The extreme designation was to allow a longer time period for these technologies to develop. If attainment cannot be demonstrated within the specified deadline without relying on “black-box” measures, EPA would have been required to impose sanctions on the region had the bump-up request not been approved. In April 2010, the EPA approved the change in the non-attainment designation from “severe-17” to “extreme.” This reclassification set a later attainment deadline (2024), but also required the air basin to adopt even more stringent emissions controls.

Table 4
South Coast Air Basin Emissions Forecasts (Emissions in tons/day)

Pollutant	2015^a	2020^b	2025^b	2030^b
NOx	357	289	266	257
VOC	400	393	393	391
PM-10	161	165	170	172
PM-2.5	67	68	70	71

^a2015 Base Year.

^bWith current emissions reduction programs and adopted growth forecasts.

Source: California Air Resources Board, 2013 Almanac of Air Quality

In other air quality attainment plan reviews, EPA had disapproved part of the SCAB PM-2.5 attainment plan included in the AQMP. EPA stated that the current attainment plan relied on PM-2.5 control regulations that had not yet been approved or implemented. It was expected that a number of rules that were pending approval would remove the identified deficiencies. If these issues were not resolved within the next several years, federal funding sanctions for transportation projects could result. The 2012 AQMP included in the current California State Implementation Plan (SIP) was expected to remedy identified PM-2.5 planning deficiencies.

The federal Clean Air Act requires that non-attainment air basins have EPA approved attainment plans in place. This requirement includes the federal one-hour ozone standard even though that standard was revoked almost ten years ago. There was no approved attainment plan for the one-hour federal standard at the time of revocation. Through a legal quirk, the SCAQMD is now required to develop an AQMP for the long since revoked one-hour federal ozone standard. Because the current SIP for the basin contains a number of control measures for the 8-hour ozone standard that are equally effective for one-hour levels, the 2012 AQMP was believed to satisfy hourly attainment planning requirements.

AQMPs are required to be updated every three years. The 2012 AQMP was adopted in early 2013. An updated AQMP was required for completion in 2016. The 2016 AQMP was adopted by the SCAQMD Board in March 2017, and has been submitted the California Air Resources Board for forwarding to the EPA. The 2016 AQMP acknowledges that motor vehicle emissions have been effectively controlled and that reductions in NOx, the continuing ozone problem pollutant, may need to come from major stationary sources (power plants, refineries, landfill flares, etc.) . The current attainment deadlines for all federal non-attainment pollutants are now as follows:

8-hour ozone (70 ppb)	2032
Annual PM-2.5 (12 µg/m ³)	2025
8-hour ozone (75 ppb)	2024 (old standard)
1-hour ozone (120 ppb)	2023 (rescinded standard)
24-hour PM-2.5 (35 µg/m ³)	2019

The key challenge is that NO_x emission levels, as a critical ozone precursor pollutant, are forecast to continue to exceed the levels that would allow the above deadlines to be met. Unless additional stringent NO_x control measures are adopted and implemented, ozone attainment goals may not be met.

The proposed project does not directly relate to the AQMP in that there are no specific air quality programs or regulations governing residential development projects. Conformity with adopted plans, forecasts and programs relative to population, housing, employment and land use is the primary yardstick by which impact significance of planned growth is determined. The SCAQMD, however, while acknowledging that the AQMP is a growth-accommodating document, does not favor designating regional impacts as less-than-significant just because the proposed development is consistent with regional growth projections. Air quality impact significance for the proposed project has therefore been analyzed on a project-specific basis.

AIR QUALITY IMPACT

STANDARDS OF SIGNIFICANCE

Air quality impacts are considered “significant” if they cause clean air standards to be violated where they are currently met, or if they “substantially” contribute to an existing violation of standards. Any substantial emissions of air contaminants for which there is no safe exposure, or nuisance emissions such as dust or odors, would also be considered a significant impact.

Appendix G of the California CEQA Guidelines offers the following four tests of air quality impact significance. A project would have a potentially significant impact if it:

- a. Conflict with or obstruct implementation of the applicable air quality plan?
- b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?
- c. Expose sensitive receptors to substantial pollutant concentrations?
- d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Primary Pollutants

Air quality impacts generally occur on two scales of motion. Near an individual source of emissions or a collection of sources such as a crowded intersection or parking lot, levels of those pollutants that are emitted in their already unhealthful form will be highest. Carbon monoxide (CO) is an example of such a pollutant. Primary pollutant impacts can generally be evaluated directly in comparison to appropriate clean air standards. Violations of these standards where they are currently met, or a measurable worsening of an existing or future violation, would be considered a significant impact. Many particulates, especially fugitive dust emissions, are also primary pollutants. Because of the non-attainment status of the South Coast Air Basin (SCAB) for PM-10, an aggressive dust control program is required to control fugitive dust during project construction.

Secondary Pollutants

Many pollutants, however, require time to transform from a more benign form to a more unhealthful contaminant. Their impact occurs regionally far from the source. Their incremental regional impact is minute on an individual basis and cannot be quantified except through complex photochemical computer models. Analysis of significance of such emissions is based upon a specified amount of emissions (pounds, tons, etc.) even though there is no way to translate those emissions directly into a corresponding ambient air quality impact.

Because of the chemical complexity of primary versus secondary pollutants, the SCAQMD has designated significant emissions levels as surrogates for evaluating regional air quality impact significance independent of chemical transformation processes. Projects with daily emissions that

exceed any of the following emission thresholds are recommended by the SCAQMD to be considered significant under CEQA guidelines.

**Table 5
Daily Emissions Thresholds**

Pollutant	Construction	Operations
ROG	75	55
NOx	100	55
CO	550	550
PM-10	150	150
PM-2.5	55	55
SOx	150	150
Lead	3	3

Source: SCAQMD CEQA Air Quality Handbook, November, 1993 Rev.

Additional Indicators

In its CEQA Handbook, the SCAQMD also states that additional indicators should be used as screening criteria to determine the need for further analysis with respect to air quality. The additional indicators are as follows:

- Project could interfere with the attainment of the federal or state ambient air quality standards by either violating or contributing to an existing or projected air quality violation
- Project could result in population increases within the regional statistical area which would be in excess of that projected in the AQMP and in other than planned locations for the project's build-out year.
- Project could generate vehicle trips that cause a CO hot spot.

CONSTRUCTION ACTIVITY IMPACTS

CalEEMod was developed by the SCAQMD to provide a model by which to calculate both construction emissions and operational emissions from a variety of land use projects. It calculates both the daily maximum and annual average emissions for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions.

The project entails construction of 145 single family homes on 28.3-acres with 11.8 acres of roadway. Emissions were modeled using CalEEMod (version 2016.3.2) and with default assumptions modestly adjusted for consistency with the project description where build-out is expected to require 3 years. Grading durations and equipment defaults were expanded based on

the required type and quantity of grading. The schedule and equipment that was modeled is shown in Table 6.

**Table 6
Construction Activity Equipment Fleet**

Phase Name and Duration	Equipment
Grading (90 days)	2 Graders
	2 Scrapers
	2 Excavators
	1 Dozer
	2 Tractors
Construction (500 days)	1 Crane
	3 Loader/Backhoes
	1 Welder
	1 Generator Set
	3 Forklifts
Paving (35 days)	2 Pavers
	2 Paving Equipment
	2 Rollers
Painting (35 days)	1 Air Compressor

Utilizing this indicated equipment fleet and durations shown in Table 6 the following worst-case daily construction emissions are calculated by CalEEMod and are listed in Table 7.

**Table 7
Construction Activity Emissions
Maximum Daily Emissions (pounds/day)**

Maximal Construction Emissions*	ROG	NO_x	CO	SO₂	PM-10	PM-2.5
Year 2020	5.7	67.3	35.1	0.1	5.8	3.9
Year 2021	2.7	22.9	23.4	0.1	3.0	1.5
Year 2022	53.9	20.8	22.7	0.1	2.8	1.3
SCAQMD Thresholds	75	100	550	150	150	55

*with mandatory compliance with SCAQMD Rule 403

Peak daily construction activity emissions shown in Table 7 are estimated to be below SCAQMD CEQA thresholds and include required compliance with SCAQMD Rule 403 for fugitive dust, which requires watering of dust at least three times a day during grading activities.

Construction equipment exhaust contains carcinogenic compounds within the diesel exhaust particulates. The toxicity of diesel exhaust is evaluated relative to a 24-hour per day, 365 days per year, 70-year lifetime exposure. The SCAQMD does not generally require the analysis of construction-related diesel emissions relative to health risk due to the short period for which the majority of diesel exhaust would occur. Health risk analyses are typically assessed over a 9-, 30-,

or 70-year timeframe and not over a relatively brief construction period due to the lack of health risk associated with such a brief exposure.

OPERATIONAL IMPACTS

The project would generate 1,369 daily trips using trip generation numbers provided in the project traffic report. Operational emissions were calculated using CalEEMod (version 2016.3.2) for an assumed full occupancy year of 2022. The operational impacts are shown in Table 8. As shown, operational emissions will not exceed applicable SCAQMD operational emissions CEQA thresholds of significance.

**Table 8
Proposed Uses Daily Operational Impacts (2022)**

Source	Operational Emissions (lbs/day)					
	ROG	NOx	CO	SO ₂	PM-10	PM-2.5
Area	7.2	2.3	12.9	0.0	0.2	0.2
Energy	0.1	1.1	0.5	0.0	0.1	0.1
Mobile	2.4	12.2	31.8	0.1	10.0	2.7
Total	9.7	15.6	45.2	0.1	10.3	3.0
SCAQMD Threshold	55	55	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod Output in Appendix

BLASTING AIR POLLUTION EMISSIONS

Construction activity blasting may lead to air emissions from several pathways. Explosive detonation creates chemical reactions that produce a variety of air pollutants (primarily gaseous). Ejected materials are primarily fugitive dust, especially larger diameter particulate matter. There are literally hundreds of types of explosives, and an infinite number of soil types that may be expelled during a blasting event. The emissions per event are further determined by the explosive charge weight which is driven by safety concerns and construction objectives. Given the large number of input variables, blasting activity air quality impact assessments are necessarily speculative. In recognition of this difficulty, EPA assigns a generic emission factor in the development of a national emissions inventory for construction and production blasting activities. Ammonium nitrate/fuel oil (ANFO) mixtures are commonly used as explosives because they are inexpensive and relatively safe. The explosion of 200 pounds per day of ANFO is stated by EPA to produce the following gaseous pollutants:

CO	6.7	pounds
NOx	1.7	pounds
SO ₂	0.2	pounds

Compared to the previously cited construction activity significance thresholds, the daily emissions burden from the chemical reactions of explosives is much less than significant. Any measurable air quality impacts would likely derive from fugitive dust associated with ejected material.

Blast hole drilling is a multi-step process that entails placing the drill and adjusting the leveling jacks, extending the boom, deploying any dust control equipment as needed, drilling the hole and reversing the procedure upon hole completion.

If blasting occurs, a drill and blast method is proposed for removal of the rock. The rock blasting will involve drilling blast holes, placing explosive charges in each of the blast holes, detonation, and the removal of spoils. There is also potential for subsequent on-site rock crushing for aggregate.

Each blast sequence would typically consist of 1 hour of drilling and blast preparation, 15-minute safety check to ensure everything is clear and ready for the blast, a blast consisting of a sequence of timed explosive charges as described above, and up to 4 hours to remove spoils. This would limit blasting to two events per day in any particular area.

The unmitigated PM-10 emission rate stated in EPA AP-42, Table 11.9.4 is 0.65 lb/hole drilled. For a single rig typical of the rock outcropping blasting, the daily PM-10 emission rate is 1.3 pounds per day. The addition of this PM-10 level to the construction activity fugitive dust burden would not cause the regional significance threshold to be exceeded.

Blasting itself creates very little PM-10 as the intent of the blast is to fracture the rock layer without creating any ejected material. During the blast itself, most other on-site work in proximity to the blast is halted for safety reasons. Although grading could occur on other portions of the site, the site is more than 53 acres. If grading occurs concurrent with blasting it could be as much as 2,500 feet away.

The PM-10 emission rate is stated in EPA AP-42, Table 11.9.1 to be 0.2 lb/blast. Given the reduced on-site activity level on blasting day and the burying the charge so deep in the ground, no cumulatively significant PM-10 emissions will result from blasting itself. Loading the fractured material into haul trucks can generate a localized dust nuisance in close proximity to the loader filling the truck bed. In the EPA reference above, a complicated formula involving wind speed (directly proportional), moisture content (inversely proportional) and the ratio of PM-10 to total suspended particulates predicts an unmitigated PM-10 emission rate of 0.19 pounds of PM-10 per ton loaded. Daily production of fractured rock is not currently known, but a reasonable estimate of 30 tons per day would yield 5.7 pounds of PM-10 per day. As with the drilling emissions that may occur simultaneously, the overall regional PM-10 burden would not exceed the adopted SCAQMD significance threshold.

The fractured material may be crushed on-site and used as fill. With required dust control for on-site crushers, the AP-42 emission factor is 0.042 pound per ton processed. The 30 ton/day throughput for truck loading would equate to 1.3 pounds of PM-10 from on-site crushing. The addition of this increment to the over-all PM-10 burden would still remain below the regional PM-10 significance threshold.

Total PM-10 emissions could be as high as 5.7 lbs a day for crushing, 1.3 pounds per day for truck loading, and 1.3 pounds per day for blasting for a total of 8.3 pounds per day.

LOCALIZED SIGNIFICANCE THRESHOLDS CONSTRUCTION AND OPERATIONAL

The SCAQMD has developed analysis parameters to evaluate ambient air quality on a local level in addition to the more regional emissions-based thresholds of significance. These analysis elements are called Localized Significance Thresholds (LSTs). LSTs were developed in response to Governing Board's Environmental Justice Enhancement Initiative 1-4 and the LST methodology was provisionally adopted in October 2003 and formally approved by SCAQMD's Mobile Source Committee in February 2005.

Use of an LST analysis for a project is optional. For the proposed project, the primary source of possible LST impact would be during construction. LSTs are applicable for a sensitive receptor where it is possible that an individual could remain for 24 hours such as a residence, hospital or convalescent facility. An LST analysis for operational emissions can also be performed.

LSTs are only applicable to the following criteria pollutants: oxides of nitrogen (NO_x), carbon monoxide (CO), and particulate matter (PM-10 and PM-2.5). LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.

LST screening tables are available for 25, 50, 100, 200 and 500 meter source-receptor distances. For this project, there are several adjacent residential uses such that the most conservative 25 meter distance was modeled.

The SCAQMD has issued guidance on applying CalEEMod to LSTs. LST pollutant screening level concentration data is currently published for 1, 2 and 5 acre sites. LSTs are based on the ambient concentrations of that pollutant and the distance to the nearest sensitive receptor. LST analysis for construction is applicable for all projects of five acres and less; however, it can be used as screening criteria for larger projects to determine whether dispersion modeling may be required. For this project based on methodology established by the SCAQMD for the use of CalEEMod construction emissions to LST thresholds, a daily construction area of 4.5 acres was used¹ in this analysis.

The following thresholds and emissions in Table 9 are therefore determined (pounds per day).

If the project exceeds the LST look-up values, then the SCAQMD recommends that project-specific air quality modeling must be performed. LSTs were compared to the maximum daily construction activities and maximum daily operational activities. As seen in Table 9, emissions will meet the LST for construction and operational thresholds and include with SCAQMD Rule 403 that requires on-site dust mitigation. LST impacts are less-than-significant.

¹ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2> Fact Sheet for Applying CalEEMod to Localized Significance Thresholds

**Table 9
LST and Project Emissions (pounds/day)**

Perris Valley Construction Thresholds	CO	NOx	PM-10	PM-2.5
LST Threshold	1,460	253	12	7
Max On-Site Emissions	35	67	6	4
Perris Valley Operational Thresholds	CO	NOx	PM-10	PM-2.5
LST Threshold	1,460	253	4	2
Max On-Site Emissions*	13.4	6.5	0.3	0.3

*only on-site emissions, excludes mobile source

LOCALIZED SIGNIFICANCE THRESHOLDS BLASTING

As discussed, during the blast itself, most other on-site work in proximity to the blast is halted for safety reasons. Although grading could occur on other portions of the site, the site is more than 53 acres so that grading equipment could be operating up to 2,500 feet away. It is, therefore, not reasonable to assume that both grading equipment and blasting operations could both occur simultaneously at a 25-meter distance to an existing residence.

The SCAQMD LST look-up tables for PM-10 emissions for a one-acre site in the Perris Valley, show the following PM-10 emission levels are which are considered to create a possible localized impact as a function of source-receiver distance:

- 25 meters - 4 pounds per day
- 50 meters - 12 pounds per day
- 100 meters - 30 pounds per day

An LST impact could thus be experienced if drilling and loading operations were to occur within 38 meters (interpolated) of any off-site residential property line. This separation distance is unlikely to be experienced. If it were necessary to work that close to the site boundary, standard mitigation is in common use around blasting sites. Drilling dust can be reduced by over 90 percent through the use of down-hole wet suppression or by dry shroud and dust collector. Both methods are equally effective. A partial enclosure of the load-out station, particularly with plastic curtains on the loader side dumping into the truck, is more than 80 percent effective (G. Gonzales, “Dust Protection in Mining”, Thesis, 2018). Blasting and support operations within 38 meters of the site boundary adjacent to any residential use would require selection of appropriate mitigation. With available mitigation, the localized PM-10 emissions burden could be reduced to around 3 pounds per day to shrink that off-site impact zone to less than 25 meters.

MICRO-SCALE IMPACT ANALYSIS

There is a direct relationship between traffic/circulation congestion and CO impacts, since exhaust fumes from vehicular traffic are the primary source of CO. As CO is a localized gas that dissipates

very quickly under normal meteorological conditions, CO concentrations decrease substantially as distance from the source (intersection) increases. The highest CO concentrations are typically found in areas directly adjacent to congested roadway intersections. These areas of vehicle congestion have historically had the potential to create pockets of elevated levels of CO, which are called CO “hot spots.” However, with the turnover of older vehicles, introduction of cleaner fuels, and the implementation of control technology on industrial facilities, CO concentrations in the have been declining.

Micro-scale air quality impacts have traditionally been analyzed in environmental documents where the region was a non-attainment area for CO. However, the SCAQMD has demonstrated in the CO attainment redesignation request to the EPA that there are no “hot spots” anywhere in Southern California, even at intersections with higher volumes, worse congestion, and higher background CO levels than those located in the project area. If the worst-case intersections in the SCAB have no “hot spot” potential, local impacts near the project Site would be below thresholds, with a large margin of safety.

A project is considered to have significant impacts if project-related mobile-source emissions result in an exceedance of the California one-hour and eight-hour CO standards, which are:

- 1-hour = 20 ppm
- 8-hour = 9 ppm

The maximum ambient 1-hour CO concentration in 2020 was 2.2 ppm in Riverside. In order to cause an exceedance of the CO standard, a ten-fold worsening of total automotive traffic would be required. Project impacts would not cause an exceedance of CO standards.

ODORS

Operationally the project use is residential development which does not typically create objectionable odors (as may be generated by manufacturing, industrial, or sewage treatment processes).

The project could generate odors during construction. These odors are temporary and intermittent in nature and would consist of diesel exhaust that is typical of most construction sites. The project would comply with SCAQMD Rule 402, which prohibits the discharge of air contaminants or other materials that could cause injury, detriment, nuisance, or annoyance to a considerable number of people, causes damage to property, or endangers the health and safety of the public. Compliance with Rule 402 would keep objectionable odors to a less than significant level.

CONSTRUCTION EMISSIONS MINIMIZATION

Ozone precursor emissions (ROG and NO_x) are calculated to be below SCAQMD CEQA thresholds. However, because of the regional non-attainment for photochemical smog, the use of reasonably available control measures for diesel exhaust is recommended. Combustion emissions control options include:

Exhaust Emissions Control

- Utilize well-tuned off-road construction equipment.
- Establish a preference for contractors using Tier 3 or better rated heavy equipment.
- Enforce 5-minute idling limits for both on-road trucks and off-road equipment.

Blasting Mitigation

The following provisions shall be implemented to reduce impacts and emissions associated with blasting activities:

- A blasting execution plan shall be developed and approved prior to any implosion event. This blasting execution plan shall evaluate the feasibility of staged implosion to minimize dust generation and exposure.
- A public notification program shall be instituted prior to the implosion event, which includes recommendations to minimize exposure to airborne dust.
- The implosion shall be scheduled during periods of low/no wind speeds.
- A dust control plan shall be developed to identify measures and equipment necessary to minimize dust from windblown storage piles, off-site tracking of dust, debris loading, truck hauling of debris, vehicle speed limits, and to identify other dust suppression measures. The construction contractor shall 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 shall be implemented during blasting, rock crushing or any activity to reduce fugitive dust generated during transfer and conveyance of crushed material.

GREENHOUSE GAS EMISSIONS

“Greenhouse gases” (so called because of their role in trapping heat near the surface of the earth) emitted by human activity are implicated in global climate change, commonly referred to as “global warming.” These greenhouse gases contribute to an increase in the temperature of the earth’s atmosphere by transparency to short wavelength visible sunlight, but near opacity to outgoing terrestrial long wavelength heat radiation in some parts of the infrared spectrum. The principal greenhouse gases (GHGs) are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. For purposes of planning and regulation, Section 15364.5 of the California Code of Regulations defines GHGs to include carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. Fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of GHG emissions, accounting for approximately half of GHG emissions globally. Industrial and commercial sources are the second largest contributors of GHG emissions with about one-fourth of total emissions.

California has passed several bills and the Governor has signed at least three executive orders regarding greenhouse gases. GHG statutes and executive orders (EO) include AB 32, SB 1368, EO S-03-05, EO S-20-06 and EO S-01-07.

AB 32 is one of the most significant pieces of environmental legislation that California has adopted. Among other things, it is designed to maintain California’s reputation as a “national and international leader on energy conservation and environmental stewardship.” It will have wide-ranging effects on California businesses and lifestyles as well as far reaching effects on other states and countries. A unique aspect of AB 32, beyond its broad and wide-ranging mandatory provisions and dramatic GHG reductions are the short time frames within which it must be implemented. Major components of the AB 32 include:

- Require the monitoring and reporting of GHG emissions beginning with sources or categories of sources that contribute the most to statewide emissions.
- Requires immediate “early action” control programs on the most readily controlled GHG sources.
- Mandates that by 2020, California’s GHG emissions be reduced to 1990 levels.
- Forces an overall reduction of GHG gases in California by 25-40%, from business as usual, to be achieved by 2020.
- Must complement efforts to achieve and maintain federal and state ambient air quality standards and to reduce toxic air contaminants.

Statewide, the framework for developing the implementing regulations for AB 32 is under way. Maximum GHG reductions are expected to derive from increased vehicle fuel efficiency, from greater use of renewable energy and from increased structural energy efficiency. Additionally, through the California Climate Action Registry (CCAR now called the Climate Action Reserve), general and industry-specific protocols for assessing and reporting GHG emissions have been

developed. GHG sources are categorized into direct sources (i.e. company owned) and indirect sources (i.e. not company owned). Direct sources include combustion emissions from on-and off-road mobile sources, and fugitive emissions. Indirect sources include off-site electricity generation and non-company owned mobile sources.

THRESHOLDS OF SIGNIFICANCE

In response to the requirements of SB97, the State Resources Agency developed guidelines for the treatment of GHG emissions under CEQA. These new guidelines became state laws as part of Title 14 of the California Code of Regulations in March, 2010. The CEQA Appendix G guidelines were modified to include GHG as a required analysis element. A project would have a potentially significant impact if it:

- Generates GHG emissions, directly or indirectly, that may have a significant impact on the environment, or,
- Conflicts with an applicable plan, policy or regulation adopted to reduce GHG emissions.

Section 15064.4 of the Code specifies how significance of GHG emissions is to be evaluated. The process is broken down into quantification of project-related GHG emissions, making a determination of significance, and specification of any appropriate mitigation if impacts are found to be potentially significant. At each of these steps, the new GHG guidelines afford the lead agency with substantial flexibility.

Emissions identification may be quantitative, qualitative or based on performance standards. CEQA guidelines allow the lead agency to “select the model or methodology it considers most appropriate.” The most common practice for transportation/combustion GHG emissions quantification is to use a computer model such as CalEEMod, as was used in the ensuing analysis.

The significance of those emissions then must be evaluated; the selection of a threshold of significance must take into consideration what level of GHG emissions would be cumulatively considerable. The guidelines are clear that they do not support a zero net emissions threshold. If the lead agency does not have sufficient expertise in evaluating GHG impacts, it may rely on thresholds adopted by an agency with greater expertise.

On December 5, 2008 the SCAQMD Governing Board adopted an Interim quantitative GHG Significance Threshold for industrial projects where the SCAQMD is the lead agency (e.g., stationary source permit projects, rules, plans, etc.) of 10,000 Metric Tons (MT) CO₂ equivalent/year. In September 2010, the SCAQMD CEQA Significance Thresholds GHG Working Group released revisions which recommended a threshold of 3,000 MT CO₂e for all land use projects. This 3,000 MT/year recommendation has been used as a guideline for this analysis. In the absence of an adopted numerical threshold of significance, project related GHG emissions in excess of the guideline level are presumed to trigger a requirement for enhanced GHG reduction at the project level.

PROJECT RELATED GHG EMISSIONS GENERATION

Construction Activity GHG Emissions

The project is assumed to require less than three years for construction. During project construction, the CalEEMod (version 2016.3.2) computer model predicts that the construction activities will generate the annual CO₂e emissions identified in Table 10.

Table 10
Construction Emissions (Metric Tons CO₂e)

	CO₂e
Year 2020	747.4
Year 2021	657.9
Year 2022	226.4
Total	1,631.7
Amortized	54.4

CalEEMod Output provided in appendix

SCAQMD GHG emissions policy from construction activities is to amortize emissions over a 30-year lifetime. The amortized level is also provided. GHG impacts from construction are considered individually less-than-significant.

Project Operational GHG Emissions

The input assumptions for operational GHG emissions calculations, and the GHG conversion from consumption to annual regional CO₂e emissions are summarized in the CalEEMod (version 2016.3.2) output files found in the appendix of this report.

The total operational and annualized construction emissions for the proposed project are identified in Table 11. The project GHG emissions are considered less-than-significant.

Table 11
Operational Emissions
(Metric Tons CO₂e)

Consumption Source	
Area Sources*	34.0
Energy Utilization	634.5
Mobile Source	1,959.0
Solid Waste Generation	85.6
Water Consumption	72.1
Construction	54.4
Total	2,839.6
Guideline Threshold	3,000

*assumes use of natural gas hearths as mandated by the SCAQMD

CONSISTENCY WITH GHG PLANS, PROGRAMS AND POLICIES

The City of Perris has developed a Greenhouse Gas Reduction Plan in February of 2016². The CAP was developed to address global climate change through the reduction of harmful GHG emissions at the community level, and as part of California's mandated statewide GHG emissions reduction goals under AB 32. Perris's CAP, including the GHG inventories and forecasts contained within, is based on the Western Riverside Council of Governments (WRCOG's) Subregional CAP. The Perris CAP utilized WRCOG's analysis of existing GHG reduction programs and policies that have already been implemented in the subregion and applicable best practices from other regions to assist in meeting the 2020 subregional reduction target. The CAP reduction measures chosen for the City's CAP were based on their GHG reduction potential, cost benefit characteristics, funding availability, and feasibility of implementation in the City of Perris. The CAP used an inventory base year of 2010 and included emissions from the following sectors: residential energy, commercial/industrial energy, transportation, waste, and wastewater. The CAP's 2020 reduction target is 15% below 2010 levels, and the 2035 reduction target is 47.5% below 2010 levels.

The City of Perris is expected to meet these reduction targets through implementation of statewide and local measures. The Project would be consistent with the 2008 Scoping Plan, the 2017 Scoping Plan, and the City of Perris CAP. As such, the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases and a less than significant impact would occur with respect to this threshold.

² <http://www.cityofperris.org/city-gov/agenda/2016/02-23-16-council-8b.pdf>

CALEEMOD (VERSION 2016.3.2) COMPUTER MODEL OUTPUT

- **DAILY EMISIONS**
- **ANNUAL EMISSIONS**