

5.3 AIR QUALITY

5.3.1 INTRODUCTION

The air quality impacts of the proposed project are evaluated in detail for the East Gateway Project. The findings of the air quality study are summarized in this section.

5.3.2 EXISTING CONDITIONS

5.3.2.1 *Existing Regional Air Quality*

Air pollutant emissions within Ventura County are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples are boilers or combustion equipment that produces electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products such as barbecue lighter fluid and hair spray. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, agricultural equipment, racecars, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The South Central Coast Air Basin ("Basin") has low mixing heights and light winds, which help to accumulate air pollutants. The average daily emissions inventory for the entire Basin and the Ventura County portion of the Basin is summarized in **Table 5.3-1, Regional Average Emissions in 2008**, which is the most recent data available from the California Air Resources Board (ARB). As shown, exhaust emissions from mobile sources generate the majority of reactive organic compounds (ROC), oxides and nitrogen (NO_x), and carbon monoxide (CO) in the Basin and Ventura County. Area-wide sources generate the most airborne particulates (i.e., respirable particulate matter (PM₁₀) and fine particulate matter (PM_{2.5})).

**Table 5.3-1
Regional Average Emissions in 2008**

Emissions Source	Emissions in Tons Per Day					
	ROC	CO	NOx	SOx	PM ₁₀	PM _{2.5}
<u>South Central Coast Air Basin</u>						
Stationary Sources	20.8	12.5	11.4	11.8	2.4	1.4
Area-wide Sources	32.1	91.5	4.5	0.1	69.6	20.2
Mobile Sources	51.5	404.9	88.1	0.8	4.8	3.8
Total Emissions	104.4	508.9	103.9	12.7	76.7	25.4
<u>Ventura County</u>						
Stationary Sources	9.19	4.98	2.84	0.30	0.72	0.50
Area-wide Sources	13.09	21.81	1.68	0.05	21.72	5.25
Mobile Sources	24.63	178.42	59.12	11.39	4.03	3.54
Total Emissions	46.91	205.21	63.64	11.74	26.48	9.29

Source: California Air Resources Board, 2012.

Measurements of ambient concentrations of the criteria pollutants are used by the U.S. Environmental Protection Agency (U.S. EPA) and the ARB to assess and classify the air quality of each regional air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and state standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in “attainment” for that pollutant. If the pollutant concentration meets or exceeds the standard (depending on the specific standard for the individual pollutants), the area is classified as “nonattainment” area.¹ If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated “unclassified.”

The U.S. EPA and the ARB use different standards for determining whether an air basin or county is an attainment area. Under national standards, Ventura County is currently classified as a moderate nonattainment area for 8-hour ozone concentrations. Ventura County is in attainment or designated as unclassified for all other pollutants under national standards. Under state standards, Ventura County is designated as a nonattainment area for ozone (O₃), PM₁₀, PM_{2.5}, and an attainment area for all other pollutants.

¹ National Ambient Air Quality Standards (other than ozone, particulate matter, and those based on annual averages or 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 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 above the standard is less than one. For PM_{2.5}, 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. California Ambient Air Quality Standards for ozone, CO, sulfur dioxide (SO₂) (1- and 24-hour), nitrogen dioxide (NO₂), PM₁₀, PM_{2.5}, and visibility reducing particles are values that are not to be exceeded. Standards for all other pollutants are not to be equaled or exceeded.

5.3.2.2 Existing Local Air Quality

The Ventura County Air Pollution Control District (VCAPCD) monitors ambient air pollutant concentrations through a series of monitoring stations located throughout the County. These stations are located in Thousand Oaks, El Rio, San Buenaventura (two stations), Piru, Ojai, Simi Valley, and on Anacapa Island. In addition, the ARB operated a monitoring station in western Ventura County. The City of Santa Paula is located between El Rio and Piru monitoring stations. The El Rio station measures ambient concentrations of O₃, PM₁₀, PM_{2.5}, and NO₂. Ambient concentrations of ozone and PM_{2.5} are measured at the Piru station.

Table 5.3-2, Local Ambient Air Quality – El Rio and Piru Monitoring Stations, identifies the national and state ambient air quality standards for relevant air pollutants along with the ambient pollutant concentrations that have been measured at the El Rio and Piru monitoring stations during the period 2009 through 2011, which is the most recent data available from the ARB.

Traffic-congested roadways and intersections have the potential to generate localized concentrations levels of CO. Localized areas where ambient concentrations exceed national and/or state standards for CO are termed CO “hotspots.”

CO hotspots used to be a concern in Ventura County when this area was designated as a nonattainment area for state and national CO standards. The county is now in attainment of all applicable State and national standards for CO and CO concentrations are no longer monitored in the county. This is due to substantial reductions in CO emissions from motor vehicles. The greatest potential for a CO hotspot to occur in Ventura County today is at the roadway edge of a very congested intersection.

In order for a receptor to be exposed to a CO hotspot, that person would have to remain in a location where the total CO concentration exceeds the state and national eight-hour standard for an entire eight-hour period or greater. For that to occur, the ambient (background) CO concentration would have to be very high and an intersection would have to be highly congested for a period of eight-hours or greater.²

As shown in **Table 5.13-5, Intersection Level of Service Analysis – Existing Year (2011) Conditions**, study-area intersections currently operate at Level of Service (LOS) D or better. The only intersections that operate at LOS D are at three freeway ramps and there are no sensitive receptors at the edge of these intersection roadways. As such, no sensitive receptors in the vicinity of the study-area intersections are exposed to CO hotspots.

² The intersection would need to operate at Level of Service (LOS) F for long periods.

**Table 5.3-2
Local Ambient Air Quality – El Rio and Piru Monitoring Stations**

Emissions Source	Year		
	2009	2010	2011
<u>El Rio Monitoring Station</u>			
<u>Ozone</u>			
Maximum 1-hour concentration measured	0.099 ppm	0.083 ppm	0.081 ppm
Days exceeding state 0.090 ppm 1-hour standard	1	0	0
Maximum 8-hour concentration measured	0.077 ppm	0.073 ppm	0.069 ppm
Days exceeding national 0.075 ppm 1-hour standard	1	0	0
Days exceeding state 0.070 ppm 1-hour standard	1	1	0
<u>Respirable Particulate Matter (PM₁₀)</u>			
Maximum 24-hour concentration measured	99.9 µg/m ³	61.5 µg/m ³	51.7 µg/m ³
Estimated days exceeding national 150 µg/m ³ 24-hour standard	0	0	0
Estimated days exceeding state 50 µg/m ³ 24-hour standard	12.2	6.0	5.7
Annual Arithmetic Mean (AAM) measured	25.5 µg/m ³	21.7 µg/m ³	22.2 µg/m ³
Does measured AAM exceed state 20 µg/m ³ standard?	Yes	Yes	Yes
<u>Fine Particulate Matter (PM_{2.5})</u>			
Maximum 24-hour concentration measured	24.5 µg/m ³	27.7 µg/m ³	28.7 µg/m ³
Estimated days exceeding national 35 µg/m ³ 24-hour standard	0	0	0
AAM measured	10.2 µg/m ³	8.5 µg/m ³	11.4 µg/m ³
Does measured AAM exceed state 12 µg/m ³ standard?	No	No	No
<u>Nitrogen Dioxide (NO₂)</u>			
Maximum 1-hour concentration measured	0.051 ppm	0.060 ppm	0.090 ppm
Days exceeding state 0.18 ppm 1-hour standard	0	0	0
AAM measured	0.008 ppm	0.007 ppm	0.007 ppm
Does measured AAM exceed state 0.030 ppm standard?	No	No	No
<u>Piru Monitoring Station</u>			
<u>Ozone</u>			
Maximum 1-hour concentration measured	0.109 ppm	0.087 ppm	0.100 ppm
Days exceeding state 0.090 ppm 1-hour standard	5	0	1
Maximum 8-hour concentration measured	0.093 ppm	0.082 ppm	0.084 ppm
Days exceeding national 0.075 ppm 1-hour standard	11	1	2
Days exceeding state 0.070 ppm 1-hour standard	16	4	6
<u>Fine Particulate Matter (PM_{2.5})</u>			
Maximum 24-hour concentration measured	34.2 µg/m ³	24.2 µg/m ³	22.9 µg/m ³
Estimated days exceeding national 35 µg/m ³ 24-hour standard	0	0	0
AAM measured	9.5 µg/m ³	8.5 µg/m ³	7.6 µg/m ³
Does measured AAM exceed state 12 µg/m ³ standard?	No	No	No

Source: California Air Resources Board, 2012.

Notes:

ppm = parts per million by volume.

µg/m³ = micrograms per cubic meter.

AAM = Annual Arithmetic Mean.

5.3.2.3 Existing Annexation Area Emissions

The project area is currently in varying stages of development with some areas developed with existing residential, commercial, and light industrial uses and other undeveloped areas being used for agricultural. Air pollutant emissions are generated in the local vicinity by stationary, area, and mobile sources, primarily automobile and truck traffic.

5.3.3 REGULATORY SETTING

5.3.3.1 Regulatory Background

Certain air pollutants are recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants are identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in the prevalent air quality.

The air pollutants for which national and State standards are promulgated and which are most relevant to air quality planning and regulation in Ventura County include ozone (O₃), carbon monoxide (CO), respirable particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulfur dioxide (SO₂), and lead. In addition, toxic air contaminants and greenhouse gas (GHG) emissions are of concern in the Basin. Each of these is described briefly below.

Ozone is a gas that is formed when reactive organic compounds (ROC) and nitrogen oxides (NO_x)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable.

An elevated level of ozone irritates the lungs and breathing passages, causing coughing, and pain in the chest and throat thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

Carbon Monoxide is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are the primary source of CO in the Basin, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of moderate levels of carbon monoxide can cause nausea, dizziness, and headaches, and can be fatal at high concentrations.

Respirable Particulate Matter (PM₁₀) and **Fine Particulate Matter** (PM_{2.5}) consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. In agricultural areas such as Ventura County, large amount of airborne particulates are generated by plowing and other fieldwork. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

The human body naturally prevents the entry of larger particles into the body. However, PM₁₀ and even smaller PM_{2.5} are trapped in the nose, throat, and upper respiratory tract. These small particulates enter the body and could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM₁₀ and PM_{2.5}. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulate could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Nitrogen Dioxide (NO₂) is a byproduct of fuel combustion. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO₂, creating the mixture of NO and NO₂ commonly called NO_x. NO₂ absorbs blue light and the result is a brownish-red cast to the atmosphere and reduced visibility. NO₂ also contributes to the formation of PM₁₀.

Major sources of NO_x include power plants, large industrial facilities and motor vehicles. Nitrogen oxides irritate the nose and throat. It increases susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_x is its function as a precursor to the formation of ozone.

Sulfur Dioxide (SO₂) is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly because of burning high sulfur-content fuel oils and coal, and from chemical processes occurring at chemical plants and refineries.

Major sources of SO₂ include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. Sulfur dioxide potentially causes wheezing, shortness of breath, and coughing. High levels of

particulate appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Lead occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles so most combustion lead emissions are associated with off-road vehicles such as racecars. Other sources of lead include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and secondary lead smelters.

Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

Toxic Air Contaminants (TACs) refer to a diverse group of air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional.

5.3.3.2 *Federal*

Federal Clean Air Act

The federal Clean Air Act (CAA) establishes national ambient air quality standards (NAAQS) for atmospheric pollutants. Under the CAA, the U.S. Environmental Protection Agency (U.S. EPA) is responsible for setting and enforcing the NAAQS. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The U.S. EPA also has jurisdiction over emissions sources outside state waters (outer continental shelf) and establishes various emissions standards for vehicles sold in states other than California. **Appendix 5.3** to this EIR includes the NAAQS currently in effect for each of the criteria pollutants.

As part of its enforcement responsibilities under the CAA, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the NAAQS. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the SIP.

5.3.3.3 State

California Clean Air Act

The California Clean Air Act (CCAA) requires all areas of the state to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practicable date. The California Air Resources Board (ARB), a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, the ARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. The ARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions. **Appendix 5.3** to this EIR includes the CAAQS currently in effect for each of the criteria pollutants as well as other pollutants recognized by the state. As shown in **Appendix 5.3**, the CAAQS includes more stringent standards than the national ambient air quality standards.

Title 24 Energy Efficiency Standards

Although not originally intended to specifically reduce air pollutant emissions, California Code of Regulations (CCR) Title 24 Part 6: California's Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended with a recognition that energy-efficient buildings require less electricity and reduce fuel consumption, which in turn decreases GHG emissions. The current 2010 Title 24 standards (effective as of January 1, 2011) were adopted to respond, amongst other reasons, to the requirements of Assembly Bill 32. Specifically, new development projects constructed in California after January 1, 2011 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards ("CALGreen") Code.³

5.3.3.4 Local

Ventura County Air Pollution Control District

The City of Santa Paula is located within the South Central Coast Air Basin (Basin), which includes all of Ventura, Santa Barbara, and San Luis Obispo Counties. The Ventura County Air Pollution Control District (VCAPCD) is the agency principally responsible for comprehensive air pollution control in the Ventura

3 24 CCR Part 11.

County portion of the Basin. To that end, the VCAPCD, a regional agency, works directly with the Southern California Association of Governments (SCAG), the Ventura County Transportation Commission, and local governments, and cooperates actively with all state and federal government agencies. The VCAPCD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures through educational programs or fines, when necessary.

Air Quality Management Plan

The VCAPCD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs). The most recent of these was adopted by the Governing Board of the VCAPCD in 2008. This AQMP, referred to as the 2007 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high pollutant levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. It identifies the control measures that will be implemented to reduce major sources of pollutants. These planning efforts have substantially decreased the population's exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the County.

The future air quality levels projected in the 2007 AQMP are based on several assumptions. For example, the VCAPCD assumes that general new development within the County will occur in accordance with population growth and transportation projections identified by County staff.

VCAPCD Rule Rules and Regulations

As stated above, the VCAPCD develops rules and regulations and establishes permitting requirements for specific pollutant sources. These rules and regulations implement the air pollution control strategies of the AQMP. A number of rules are applicable to the existing uses within the East Gateway Project Area. These and other rules would be applicable to the uses proposed and envisioned for the East Gateway Project. Chief among these is VCAPCD Rule 55 for the control of fugitive dust associated with man-made conditions such as disturbed surface areas, bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations. VCAPCD Rule 50, Opacity and VCAPCD Rule 51, Nuisance are applicable to emissions generated by construction-related and operational activities. VCAPCD Rules, 50, 51, and 55 are applicable to all development under the East Gateway Project. Other rules would be applicable to the individual operational sources that could occur within the East Gateway Project Area.

Ventura County Air Quality Assessment Guidelines

Although the VCAPCD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with plans and new development projects within the County. Instead, the VCAPCD has used its expertise and prepared the Ventura County Air Quality Assessment Guidelines to indirectly address these issues in accordance with the projections and programs of the AQMP. The purpose of the Ventura County Air Quality Assessment Guidelines is to assist Lead Agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the Basin. Specifically, the Ventura County Air Quality Assessment Guidelines explains the procedures that the VCAPCD recommends be followed during environmental review processes required by *California Environmental Quality Act* (CEQA). The Ventura County Air Quality Assessment Guidelines provides direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. The VCAPCD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the County, and adverse impacts will be minimized.

City of Santa Paula

Local jurisdictions, such as the City of Santa Paula, have the authority and responsibility to reduce air pollution through its police powers and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City of Santa Paula is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals.

General Plan

Conservation and Open Space Element

Pursuant to the Government Code,⁴ the Santa Paula General Plan Conservation and Open Space Element⁵ identifies and plans for the open space and natural resources that are available in the Santa Paula planning area and addresses the legal mandates and requirements for natural resources. Air quality is considered a natural resource and this is addressed in the Conservation and Open Space Element.

4 Government Code § 65302(d).

5 Santa Paula General Plan Open Space and Conservation Element.

The Conservation and Open Space Element provides the following goals, objectives and policies that are applicable to the East Gateway Project regarding air quality:

Goals

Goal 4.1 The improvement and protection of air quality should be encouraged and supported.

Objectives

Objective 4(a) Support regional efforts to improve air quality.

Policies

Policy 4.a.a Work with the Ventura County Air Pollution Control District, as the regional authority governing air quality, to implement and carry out their policies.

Policy 4.b.b Review individual development projects to ensure that air quality control measures are incorporated to the greatest extent possible.

Municipal Code

The City of Santa Paula Municipal Code (SPMC)⁶ provides regulations to control air emissions by transportation control measures that save vehicle miles driven through alternative modes of transportation that will aide in reducing pollution. This ordinance requires employers of 50 to 99 people to provide information on alternative transportation to work instead of the single occupant vehicle used by most people. Employers of 100 or more workers will have to provide the aforementioned information plus other more substantial measures, such as reserved vanpool spaces, bike lockers, and showers, etc.

5.3.4 THRESHOLDS OF SIGNIFICANCE

In order to assist in determining whether a project would have a significant effect on the environment, the CEQA identifies criteria for conditions that may be deemed to constitute a substantial or potentially substantial adverse change in physical conditions. Specifically, Appendix G of the *State CEQA Guidelines* (Environmental Checklist Form) lists the following thresholds, under which a project may be deemed to have a significant impact on agricultural resources if it would:

⁶ SPMC § 16.108.

- Conflict with or obstruct implementation of the applicable air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?
- Expose sensitive receptors to substantial pollutant concentrations?
- Create objectionable odors affecting a substantial number of people?

In accordance with CEQA and the CEQA review process, the City of Santa Paula assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits and monitors and enforces implementation of such mitigation. The City does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region will meet federal and state standards. Instead, the City relies upon the expertise of the VCAPCD and utilizes the Ventura County Air Quality Assessment Guidelines as the guidance document for the environmental review of plans and development proposals within its jurisdiction.

The thresholds discussed below are currently recommended by the VCAPCD in the Ventura County Air Quality Assessment Guidelines to translate the State CEQA Guidelines thresholds into numerical values or performance standards.

Criteria to Determine Consistency with the AQMP

For general development projects, the VCAPCD recommends that consistency with the current AQMP be determined by comparing the population generated by the project to the population projections used in the development of the AQMP. Inconsistency with these projections could jeopardize attainment of the air quality conditions projected in the AQMP and is considered a significant impact.

Criteria to Identify a Violation of Air Quality Standards or a Substantial Contribution to an Air Quality Violation

Construction Period Emissions

Construction-related activities are generally short-term in duration, and the VCAPCD does not recommend any thresholds of significance for their associated emissions. Instead, the VCAPCD bases the determination of significance on a consideration of the control measures to be implemented. If all

appropriate emissions control measures recommended by the Ventura County Air Quality Assessment Guidelines are implemented for a project, then construction emissions are not considered significant.

Operational Emissions – Daily Regional Emissions of ROC and NOx

The VCAPCD currently recommends that projects located everywhere in Ventura County outside of the Ojai Planning Area with operational emissions that exceed any of the following emissions thresholds should be considered significant:

- 25.0 pounds per day of ROC
- 25.0 pounds per day of NOx

Criteria to Identify a Cumulatively Considerable Net Increase in Criteria Pollutants

The VCAPCD recommends that any operational emissions from individual projects that exceed the project-specific thresholds of significance identified above be considered cumulatively considerable. These thresholds apply to individual development projects only; they do not apply to the emissions generated by related projects. The VCAPCD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

Criteria to Evaluate the Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

The VCAPCD currently recommends that impacts to sensitive receptors be considered significant when localized CO concentrations at sensitive receptors located near congested intersections exceed the national or State ambient air quality standards. These thresholds would also apply to the contribution of emissions associated with cumulative development.

5.3.5 PROJECT IMPACTS

The environmental impact analysis presented below is based on determinations made in the Notice of Preparation (NOP) for issues that were determined to be potentially significant with mitigation incorporated, or for issues identified by reviewing agencies, organizations, or individuals commenting on the NOP who made a reasonable argument that the issue was potentially significant (see **Responses to NOP, Appendix 1.0**).

5.3.5.1 Conflict with or obstruct implementation of the applicable air quality plan?

Impacts

The 2007 AQMP, discussed previously, was prepared to reduce the high levels of pollutants within Ventura County, return clean air to the region, and minimize the impact on the economy. Projects that are considered consistent with the AQMP would not interfere with attainment because they were included in the projections utilized in the formulation of the AQMP.

The projections in the 2007 AQMP are based on residential population growth within the various growth and non-growth areas of the County. The proposed project does not include any new residential uses and would not result in the direct growth of population within the Santa Paula Growth Area.

Urban development of this nature and intensity would also require the extension of urban infrastructure, including water and sewer service, and include improvements to existing roadways. The lack of these urban services is currently an impediment to growth within the project area. The water and sewer improvements required to provide service to the project area are identified in the City's adopted water and sewer master plans and these improvements have been planned to serve the project area and the approved East Area 1 Specific Plan Area located immediately to the north of the East Gateway Project Area.

Based on this information, the growth under the proposed project is planned for in the Santa Paula General Plan, would not conflict with the 2007 AQMP and, as such, would not jeopardize attainment of state and national ambient air quality standards in Ventura County. This would be a less than significant impact.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

5.3.5.2 Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Impacts

Construction Period Emissions

Development of the East Gateway Specific Plan area and the other parcels within the annexation area would generate air pollutant emissions during the construction phases of development. As discussed previously in this EIR section, construction-related activities are generally short-term in duration and the VCAPCD does not recommend any thresholds of significance for construction-related emissions. Instead, the VCAPCD bases the determination of significance on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended in the Ventura County Air Quality Assessment Guidelines relating to construction activities are implemented for a project, then construction emissions are not considered significant. Conversely, if all of the appropriate emissions control measures recommended by the VCAPCD are not implemented, then construction emissions are considered significant.

Examples of fugitive dust emissions control measures are identified in **Table 5.3-3, Examples of Construction-Related Fugitive Dust Emissions Control Measures**. Measures are also recommended to reduce the combustion-related emissions generated by construction equipment. The control efficiency of these measures would vary depending upon the size of the engine and the year that the equipment was manufactured.

Operational Emissions – Daily Regional Emissions of ROC and NOx

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities within the annexation area after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, the operation of landscape maintenance equipment, and the occasional application of architectural coatings. Mobile emissions would be generated by the motor vehicles traveling to and from the annexation area.

The analysis of daily operational emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod v. 2011.1.1) recommended by the VCAPCD and the conservative assumption that the East Gateway Specific Plan area would be completed and fully operational by 2015

**Table 5.3-3
Examples of Construction-Related Fugitive Dust Emissions Control Measures**

Emissions Source	Control Measure	PM₁₀ Control Efficiency
Active demolition and debris removal	Apply water every 4 hours to the area within 100 feet of a structure being demolished to reduce vehicle trackout.	36%
Trackout	Use a gravel apron, 25 feet long by road width, to reduce mud/dirt trackout from unpaved truck exit routes.	46%
Post-demolition stabilization	Apply dust suppressants (e.g., polymer emulsion) to disturbed areas upon completion of demolition.	84%
Demolition activities	Apply water to disturbed soils after demolition is completed or at the end of each day of cleanup.	10%
Demolition activities	Prohibit demolition activities when wind speeds exceed 25 mph.	98%
Construction activities	Apply water every 3 hours to disturbed areas within a construction site.	61%
Scraper loading and unloading	Require minimum soil moisture of 12% for earthmoving by use of a moveable sprinkler system of a water truck. Moisture content can be verified by lab sample or moisture probe.	69%
Construction traffic	Limit on-site vehicle speeds on unpaved roads to 15 mph.	57%
Construction traffic	Apply chemical dust suppressants to unpaved parking areas.	84%
Grading	Replace ground cover in disturbed areas as quickly as possible.	5%
Grading	All trucks hauling dirt, sand, soil, or other loose materials are to be tarped with a fabric cover and maintain a freeboard height of 12 inches.	91%
Storage piles	Install 3-sided enclosures with 50% porosity for storage piles.	75%
Storage piles	Water the storage pile by hand at a rate of 1.4 gallons per hour-yard, or apply cover when wind events are declared.	90%

Source: South Coast Air Quality Management District, 2012.

(development in years later than 2015 may result in lower emissions).⁷ **Table 5.3-4, Estimated Operational Emissions – East Gateway Specific Plan** shows the emissions that would be generated under Alternatives 1 and 2. As shown, the East Gateway Specific Plan would generate average daily operational emissions that exceed the thresholds of significance recommended by the VCAPCD. This would be a significant impact.

No actual development plans are proposed at this time for the remaining portions of the East Gateway Project area. For the purpose of disclosure, **Table 5.3-5, Estimated Operational Emissions – East Gateway Project Area** shows the emissions that could be generated by land uses envisioned for the East Gateway Project area parcels assuming that these areas would be developed consistent with the zoning designations for the area and fully operational by 2020. As shown, the complete development of the East Gateway Project area could generate average daily operational emissions that exceed the thresholds of significance recommended by the VCAPCD. Overall, this could be a significant impact. However, individual development projects would be evaluated by the City of Santa Paula to determine if they generate operational emissions that exceed the VCAPCD's recommended thresholds of significance. Projects that generate emissions in excess of the thresholds would be required to implement mitigation measures to reduce their potentially significant operational air quality impacts.

For the purpose of disclosure, **Table 5.3-6, Estimated Operational Emissions – East Gateway Project** shows the total operational emissions that could be generated by all of the land uses envisioned under the overall East Gateway Project. As shown, the complete development of the annexation areas under the East Gateway Project would generate average daily operational emissions that exceed the thresholds of significance recommended by the VCAPCD. Overall, this could be a potentially significant impact.

7 The trip generation numbers in the air quality appendix materials are slightly different than those identified for the project in Table 9 of the project traffic report. The traffic report identifies an overall generation of 20,982 average daily trips (ADT) for the East Gateway Project. However, the air quality analysis calculates the emissions for the East Gateway Specific Plan and remainder of the annexation area separately so that the EIR can identify the impacts of the Specific Plan action assuming a buildout of 2015 as well as the necessary mitigation for this component of the overall project. The emissions for the remainder of the annexation area were calculated separately since this area assumes a longer term buildout and there are no specific development proposals for this area at this time. The analysis assumes a buildout year of 2020 for the remainder of the annexation area.

The air quality analysis provides the same trip reduction credit for walk/bicycle trips as the traffic report by modifying the trip generation rate to discount these trips. The analysis does not, however, modify the trip rates to eliminate pass-by trips. The walk/bicycle trip reduction credit removes vehicles from the roadways, but pass-by trips would still access the uses within the project site and there would be minor emissions associated with the internal traffic circulation as well as start and stop emissions. The pass-by credit is addressed within in the CalEEMod inputs and calculations. The pass-by percentage that was programmed into the CalEEMod files is the same as those assumed in the traffic report. Therefore, the air quality analysis ADT numbers for the project are consistent with those identified in the traffic report prior to any reduction for pass-by trips. For example, the shopping center uses within the Specific Plan area would generate 11,980 ADT (CalEEMod calculates 11,981) prior to the pass-by trip credit. The business park and shopping uses within the Specific Plan area would generate 4,852 ADT prior to the pass-by credit.

**Table 5.3-4
Estimated Operational Emissions – East Gateway Specific Plan**

Emissions Source	Emissions in Pounds Per Day					
	ROC	CO	NOx	SOx	PM ₁₀	PM _{2.5}
Alternative 1 – Regional Retail Center						
Area Sources	8.60	0.00	0.00	0.00	0.00	0.00
Energy Sources	0.02	0.16	0.13	0.00	0.01	0.01
Mobile Sources	52.60	80.52	402.39	0.67	78.80	5.59
Total Emissions	61.22	80.68	402.52	0.67	78.81	5.60
VCAPCD Thresholds	25.00	25.00	NT	NT	NT	NT
Significant Impact?	Yes	Yes	No	No	No	No
Alternative 2 – Mixed-Use Employment Center						
Area Sources	9.99	0.00	0.00	0.00	0.00	0.00
Energy Sources	0.11	0.97	0.81	0.01	0.07	0.07
Mobile Sources	23.36	38.25	190.85	0.34	41.00	2.86
Total Emissions	33.46	39.22	191.66	0.35	41.07	2.93
VCAPCD Thresholds	25.00	25.00	NT	NT	NT	NT
Significant Impact?	Yes	Yes	No	No	No	No

Source: Cadence Environmental Consultants, 2012. Calculation data are provided in **Appendix 5.3**.

Note:

NT = no threshold of significance.

**Table 5.3-5
Estimated Operational Emissions – East Gateway Project Areas**

Emissions Source	Emissions in Pounds Per Day					
	ROC	CO	NOx	SOx	PM ₁₀	PM _{2.5}
Area Sources	16.92	0.01	0.84	0.00	0.00	0.00
Energy Sources	0.20	1.82	1.49	0.01	0.14	0.14
Mobile Sources	45.07	65.78	320.20	0.77	90.63	4.19
Total Emissions	62.19	67.61	322.53	0.78	90.77	4.33
VCAPCD Thresholds	25.00	25.00	NT	NT	NT	NT
Significant Impact?	Yes	Yes	No	No	No	No

Source: Cadence Environmental Consultants, 2012. Calculation data are provided in **Appendix 5.3**.

Note:

NT = no threshold of significance.

**Table 5.3-6
Estimated Operational Emissions – East Gateway Project**

Emissions Source	Emissions in Pounds Per Day					
	ROC	CO	NOx	SOx	PM ₁₀	PM _{2.5}
<u>Alternative 1 – Regional Retail Center</u>						
Specific Plan Area	61.22	80.68	402.52	0.67	78.81	5.60
Remainder of Annexation Area	62.19	67.61	322.53	0.78	90.77	4.33
Total Emissions	123.41	148.29	725.05	1.45	169.58	9.93
VCAPCD Thresholds	25.00	25.00	NT	NT	NT	NT
Significant Impact?	Yes	Yes	No	No	No	No
<u>Alternative 2 – Mixed-Use Employment Center</u>						
Specific Plan Area	33.46	39.22	191.66	0.35	41.07	2.93
Remainder of Annexation Area	62.19	67.61	322.53	0.78	90.77	4.33
Total Emissions	95.65	106.83	514.19	1.13	131.84	7.26
VCAPCD Thresholds	25.00	25.00	NT	NT	NT	NT
Significant Impact?	Yes	Yes	No	No	No	No

Source: Cadence Environmental Consultants, 2012. Calculation data are provided in **Appendix 5.3**.

Note:

NT = no threshold of significance.

Many of the measures that the VCAPCD currently recommends to reduce the significant operational impacts of proposed projects are features of the proposed project. Most of these measures also address area source and energy source emissions. As shown in **Tables 5.3-4** through **5.3-6**, mobile sources are the primary source of emissions associated with the proposed uses and area and energy sources are a small component of these emissions. As discussed previously, employers of 50 to 99 people will be required to provide information on alternative transportation to work instead of the single occupant vehicle used by most people. Employers of 100 or more workers will have to provide the aforementioned information plus other more substantial measures, such as reserved vanpool spaces, bike lockers, and showers, etc. It is not known how many (if any) employers within the East Gateway Project area would be subject to these requirements. These regulations would also not affect the vehicle trips associated with customers and vendors of the proposed uses. The only remaining measure recommended by the VCAPCD that would reduce the operational impacts of the proposed project to less than significant levels is the contribution to a City-managed off-site transportation demand management (TDM) fund.

The off-site TDM is a mitigation measure that can be used by project proponents for projects and programs that exceed the ROC and NOx significance thresholds. This measure applies to commercial, industrial, institutional, and residential projects, and calls for contributing to a city or county mobile source emission reduction fund established specifically to reduce emissions from transportation sources. The amount of funding is commensurate with the amount of emissions that need to be mitigated. Mitigation

programs that could be funded through such an off-site TDM fund include (but are not limited to) public transit service, vanpool programs/subsidies, rideshare assistance programs, and off-site TDM facilities. The City of Santa Paula utilizes this program to mitigate the significant air quality impacts of projects within its jurisdiction.

Mitigation Measures

Construction Period Emissions

The following measures have been identified to mitigate the identified impacts:

5.3-1 All developers of new buildings within the East Gateway Project area must implement fugitive dust control measures consistent with VCAPCD Rule 50, Rule 51, and Rule 55 throughout all phases of construction. The project developers must include in construction contracts the control measures required and recommended by the VCAPCD at the time of development. Examples of the types of measures currently required and recommended include the following:

- Apply water every 4 hours to the area within 100 feet of a structure being demolished to reduce vehicle trackout.
- Apply water to disturbed soils after demolition is completed or at the end of each day of cleanup.
- Prohibit demolition activities when wind speeds exceed 25 mph.
- Minimize the area disturbed on a daily basis by clearing, grading, earthmoving, and/or excavation operations.
- Pre-grading/excavation activities include watering the area to be graded or excavated before the commencement of grading or excavation operations. Application of water should penetrate sufficiently to minimize fugitive dust during these activities.
- All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, must be treated to prevent fugitive dust. Treatments must include, without limitation, periodic watering, application of environmentally-safe soil stabilization materials, and/or roll-compaction as appropriate. Watering must be done as often as necessary.
- Material stockpiles must be enclosed, covered, stabilized, or otherwise treated, to prevent blowing fugitive dust offsite.
- Graded and/or excavated inactive areas of the construction site must be monitored by a city-designated monitor at least weekly for dust stabilization. Soil stabilization methods, such as water and roll-compaction, and environmentally-safe control materials, must be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or

periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust.

- Signs must be posted on-site limiting on-site traffic to 15 miles per hour or less.
- During periods of high winds (i.e., wind speed sufficient to cause fugitive dust to impact adjacent properties), all clearing, grading, earth moving, and excavation operations must be stopped to the degree necessary to prevent fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor must use his/her discretion in conjunction with the VCAPCD in determining when winds are excessive.
- Adjacent streets and roads must be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.
- Personnel involved in grading operations, including contractors and subcontractors should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.

5.3-2

Before issuance of a grading permit for projects within the reorganization (annexation) areas and the East Gateway Specific Plan area, the contractor must implement measures to reduce the emissions of pollutants generated by heavy-duty diesel-powered equipment operating at the Project site throughout the project construction phases. All construction contracts must include control measures required and recommended by the VCAPCD at the time of development. Copies of the construction contracts must be submitted to the City prior to issuance of a grading permit to verify these conditions. Examples of the types of measures include the following:

- Maintain all construction equipment in good condition and in proper tune in accordance with the manufacturer's specifications.
- Limit truck and equipment idling time to five minutes or less.
- Minimize the number of vehicles and equipment operating at the same time during the smog season (May through October).
- Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, to the extent feasible.

Operational Emissions – Daily Regional Emissions of ROC and NOx

The following measures have been identified to mitigate the identified impacts:

5.3-3

Before occupancy of new structures within the reorganization (annexation) areas, and the East Gateway Specific Plan area, the project applicant must provide to the City evidence of the following:

- Use of low-emission technology water heaters including solar, air-source heat pump, natural gas or gas-boosted solar; and
- For commercial and light industrial buildings, provide for the owner or a building maintenance association to include provisions for landscaping contractors/personnel to use electric or battery-powered equipment, or other internal combustion equipment that is certified by the California Air Resources Board, or is three years old or less at the time of use, to the extent that such equipment is reasonably available and competitively priced in Ventura County (meaning that the equipment can be easily purchased at stores in Ventura County and the cost of the equipment is not more than 20 percent greater than the cost of standard equipment).

5.3-4 Prior to building occupancy, the applicant for projects within the reorganization (annexation) areas and East Gateway Specific Plan, must pay TDM fees as required and calculated by the City pursuant to page 7-15 of the Ventura County Air Quality Assessment Guidelines or the methodology that is in effect at the time of development.

Based on the current Ventura County Air Quality Assessment Guidelines methodology, the total TDM fund contribution that would be required to mitigate the emissions of the completed project in 2015 would be \$619,785 under the Regional Retail Center scenario and \$100,485 under the Mixed-Use Employment Center scenario (see Appendix 5.3 to this EIR). Development in years later than 2015 may result in lower emissions and lower TDM fees.

The applicant within the East Gateway Specific Plan area must pay the \$619,785 under the Regional Retail Center scenario or \$100,485 under the Mixed-Use Employment Center scenario to the City TDM fund or the fees calculated under the methodology that is in effect at the time of development. The applicants of tentative maps submitted for approval after 2015 may request that the City of Santa Paula recalculate the applicable emissions projections and associated mitigation fee.

Residual Impacts

Impacts would be less than significant.

5.3.5.3 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Impacts

The VCAPCD recommends that any operational emissions from individual projects that exceed the project-specific thresholds of significance identified above be considered cumulatively considerable. As discussed in the preceding impact analysis, the proposed project would generate average daily operational emissions that exceed the thresholds of significance recommended by the VCAPCD. As such, the project would generate a cumulatively considerable net increase of criteria pollutants. This would be a significant cumulative impact.

Mitigation Measures

Mitigation Measures 5.3-3 and 5.3-4 have been identified to mitigate the identified impacts.

Residual Impacts

Impacts would be less than significant.

5.3.5.4 Expose sensitive receptors to substantial pollutant concentrations?

Impacts

As discussed previously in this EIR section, a person would have to remain in a location where the total CO concentration exceeds the state and national eight-hour standard for an entire eight-hour period or greater to be exposed to a CO hotspot. For that to occur the ambient (background) CO concentration would have to be very high and an intersection would have to be highly congested for a period of eight-hours or greater.⁸

As shown in **Table 5.13-5, Intersection Level of Service Analysis – Existing Year (2011) Plus Project Conditions**, study-area intersections are projected to operate at LOS D or better with the addition of the traffic generated by the proposed project. The only intersections that operate at LOS D are located at three freeway ramps and there are no sensitive receptors at the edge of these intersection roadways. As

⁸ The intersection would need to operate at LOS F for long periods.

such, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

5.3.5.5 Create objectionable odors affecting a substantial number of people?

Impacts

Odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. Commercial and light industrial uses are not typically associated with objectionable odor complaints. Some restaurants may generate odors that nearby residents consider to be objectionable, but this is largely dependent upon the cooking products that are used, the design of the restaurant kitchen ventilation and filtration system, and the sensitivity of the nearby residents. The restaurant kitchen design characteristics are evaluated at the time that the operator of the restaurant is requesting approval of permits from the VCAPCD. The types of industrial activities that would occur within the remainder of the annexation area are not known at this time, but would be evaluated at the time that actual development projects are proposed. Therefore, the potential impacts associated with objectionable odors would be less than significant.

Mitigation Measures

No mitigation is required.

Residual Impacts

Impacts would be less than significant.

5.3.6 CUMULATIVE ANALYSIS

Cumulative Impacts

Cumulative development in the Santa Paula Growth Area is not expected to result in a significant impact in terms of conflicting with, or obstructing implementation of, the 2007 AQMP. The 2007 AQMP was

prepared to accommodate growth, to reduce the high levels of pollutants within Ventura County, to return clean air to the region, and to minimize the impact on the economy. Growth considered consistent with the 2007 AQMP would not interfere with attainment since this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Santa Paula Growth Area is within the projections for growth identified in the AQMP, implementation of the 2007 AQMP will not be obstructed by such growth. As growth in the Santa Paula Growth Area has not exceeded these projections, this impact would not be cumulatively considerable. Additionally, since the proposed project is consistent with growth projections under the 2007 AQMP, the project would not have a cumulatively considerable contribution to this impact regarding conflict with or obstruction of the implementation of the applicable air quality plan.

Cumulative development within the City of Santa Paula would continue to implement dust control and equipment emissions mitigation measures during construction in accordance with City practices. Consequently, cumulative development within the city is not expected to cause a significant impact associated with construction activities. Since the proposed project would implement all appropriate mitigation measures during construction, the contribution of the project to any cumulative air quality impact would not be considerable.

Because Ventura County is currently in nonattainment for ozone, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the proposed project contribution, the VCAPCD neither recommends quantified analyses of cumulative operational emissions nor provides methodologies or thresholds of significance to be used to assess cumulative construction or operational impacts. Instead, the VCAPCD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. Therefore, this EIR assumes that individual development projects that generate operational emissions that exceed the VCAPCD recommended daily thresholds for project-specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As discussed previously, operational daily emissions associated with project development would exceed VCAPCD significance thresholds for ROC and NOx. Therefore, the emissions generated by proposed project would be cumulatively considerable regarding a substantial contribution to an existing or projected air quality violation. However,

Table 5.13-9, Intersection Level of Service Analysis – Future (Year 2020) without Lemonwood Drive Extension Conditions, shows that all of the study-area intersections are projected to operate at LOS D or better in the future with the addition of the traffic generated by cumulative development. As such, cumulative development would not expose sensitive receptors to substantial pollutant concentrations.

Cumulative Mitigation Measures

Mitigation Measures 5.3-1 and **5.3-4** following measures have been identified to mitigate the identified impacts.

Residual Impacts

Impacts would be less than significant.

5.3.7 REFERENCES

Local agency planning documents used in this section include the following:

- City of Santa Paula, *General Plan*, Conservation and Open Space Element, April 1998, updated February 2008.
- Ventura County Air Pollution Control District, *Ventura County Air Quality Assessment Guidelines*, October 2003.
- Ventura County Air Pollution Control District, *Final Ventura County 2007 Air Quality Management Plan*, May 13, 2008.

The following technical report was used in the preparation of this analysis and is provided in **Appendix 5.13**:

- Fehr & Peers, Inc., Draft Traffic Study for the Santa Paula East Gateway Project Environmental Impact Report, August 2012.