

Q.5.9 - Air Quality

The following impact evaluation is based on the environmental setting, regulatory setting, and thresholds of significance discussions provided for the proposed projects in Draft EIR Section 5.9, Air Quality, and in Appendix K-1, Expanded Air Quality Analysis. These previous discussions are not repeated in the following evaluation. The evaluation is a comparative analysis between the Preferred Project and Proposed Project 4.

Air Quality Plan

Q5.9-A: **The project would not conflict with or obstruct implementation of the applicable air quality plan.**

Project Specific Impact Analysis

Collection System

Similar to Proposed Project 4, the Preferred Project includes the construction and operation of a wastewater system. As shown in Table Q.5-1, the Preferred Project includes the addition of pump stations and pipelines, modifications to pipelines, alteration of the treatment process to oxidation ditch or Biolac®, and the addition of spray area for disposal at Tonini compared to Proposed Project 4. With the additions and modifications identified in Table Q.5-1, the Preferred Project would result in a similar finding of no conflict with or no obstruction with the implementation of the adopted Clean Air Plan similar to Proposed Project 4.

Cumulative Impact Analysis

Similar to Proposed Project 4, the Preferred Project would result in no impacts relating to being in conflict with or obstructing the implementation of the adopted Clean Air Plan. Therefore, the Preferred Project would not contribute to any potential cumulative impacts on the implementation of the applicable air quality plan.

Mitigation Measures

Project-Specific

No mitigation measures are required.

Cumulative

No mitigation measures are required.

Level of Significance After Mitigation

Project-Specific

No Impact.

Cumulative

No Impact.

Air Quality Standards / Violations

Q5.9-B: The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

Project Specific Impact Analysis

Similar to Proposed Project 4, the Preferred Project would include a relative short-term time frame (i.e., 2 years) for the construction of the proposed facilities. Due to this short-term construction time frame as well as the low level of operational emissions as discussed in Impact 5.9-C, the Preferred Project would not exceed the District's concentration standards. Therefore, similar to Proposed Project 4, the Preferred Project would result in less than significant impacts related to the District concentration standards.

Cumulative Impact Analysis

Similar to Proposed Project 4, the Preferred Project would result in less than significant impacts relating to exceeding the District's pollutant concentration standards. Therefore, the Preferred Project's contribution to potential cumulative impacts related to the District's concentration standards is less than cumulatively considerable.

Mitigation Measures

Project-Specific

No mitigation measures are required.

Cumulative

No mitigation measures are required.

Level of Significance After Mitigation

Project-Specific

Less than significant.

Cumulative

Less than significant.

Criteria Pollutant

Q5.9-C: The project may 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).

Project Specific Impact Analysis

Construction

Daily and quarterly construction air emissions of criteria pollutants associated with the Preferred Project would be similar to the emissions associated with Proposed Project 4. The Preferred Project

would result in the addition of pump stations and pipelines, modifications to pipelines, alteration of the treatment process to oxidation ditch or Biolac®, and the addition of spray area for disposal at Tonini compared to Proposed Project 4. The change from facultative ponds to an oxidation ditch or Biolac® would require substantially less excavation, and thereby reducing emissions. The addition of pump stations and spray area (requiring contour plowing) would increase emissions. Overall, the emissions associated with the Preferred Project would be similar to Proposed Project 4. As with Proposed Project 4, the construction air emissions associated with the Preferred Project would contribute to the potential to exceed the District's NO_x pounds per day and tons per quarter thresholds and the District's PM₁₀ tons per quarter threshold. Therefore, similar to Proposed Project 4, the Preferred Project would contribute to potential significant NO_x and PM₁₀ emissions impacts during construction of the facilities.

Operational

Similar to Proposed Project 4, long-term air emissions associated with the collection system, treatment plant site, and disposal sites would be generated by the Preferred Project. The Preferred Project's daily operational emissions of criteria pollutants would be less than the District's thresholds similar to Proposed Project 4. Therefore, long-term emissions of criteria pollutants would be less than significant.

Cumulative Impact Analysis

Similar to Proposed Project 4, the Preferred Project would result in potentially significant NO_x and PM₁₀ impacts relating to short-term construction emissions. Therefore, the Preferred Project could contribute to potential cumulatively considerable net increases in NO_x and PM₁₀ emissions; thus, resulting in significant impacts.

Mitigation Measures

Project-Specific

- 5.9-C1** Prior to issuance of grading permits, the applicant shall submit a Construction Activities Management Plan for the review and approval of the SLOAPCD. This plan shall include but not be limited to the following Best Available Control Technologies for construction equipment:
- a. Minimize the number of large pieces of construction equipment operating during any given period.
 - b. Schedule construction related truck/equipment trips during non-peak hours to reduce peak-hour emissions.
 - c. Properly maintain and tune all construction equipment according to manufacturer's specifications.
 - d. Fuel all off-road and portable diesel powered equipment including but not limited to: bulldozers, graders, cranes, loaders, scrapers, backhoes,

generators, compressors, auxiliary power units, with CARB motor vehicle diesel fuel.

- e. Use 1996 or newer heavy duty off road vehicles to the extent feasible.
- f. Use Caterpillar pre-chamber diesel engines (or equivalent) together with proper maintenance and operation to reduce emissions of NOX.
- g. Electrify equipment where possible.
- h. Use Compressed Natural Gas (CNG), liquefied natural gas (LNG), biodiesel, or propane for on-site mobile equipment instead of diesel- powered equipment.

5.9-C2 Prior to initiating grading activities, the proponent's contractor or engineer shall:

- a. Include the following specifications on all project plans: One catalyzed diesel particulate filter (CDPF) shall be used on the piece of equipment estimated to generate the greatest emissions. If a CDPF is unsuitable for the potential equipment to be controlled, five diesel oxidation catalysts (DOC) shall be used.
- b. Identify equipment to be operated during construction as early as possible in order to place the order for the appropriate filter and avoid any project delays. This is necessary so that contractors bidding on the project can include the purchase, proper installation, and maintenance costs in their bids.
- c. Contact the SLOAPCD Compliance Division to initiate implementation of this mitigation measure at least two months prior to start of construction.

5.9-C3 Prior to initiating grading activities, if it is determined that portable engines and portable equipment would be utilized, the contractor shall contact the SLOAPCD and obtain a permit to operate portable engines or portable equipment, and shall be registered in the statewide portable equipment registration program. The SLOAPCD Compliance Division shall be contacted in order to determine the requirements of this mitigation measure.

5.9-C4 Project contract documents would include the following dust control measures:

- a. Reduce the amount of the disturbed area where possible,
- b. Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site. Increased watering frequency will be required whenever wind speeds exceed 15 mph. Reclaimed (non-potable) water should be used whenever possible.
- c. All dirt stockpile areas will be sprayed daily as needed,

- d. Permanent dust control measures identified in the revegetation and landscape plans will be implemented as soon as possible following completion of any soil disturbing activities.
- e. Exposed ground areas that are planned to be reworked at dates greater than one month after initial grading will be sown with a fast germinating native grass seed and watered until vegetation is established.
- f. All disturbed soil areas not subject to revegetation will be stabilized using approved chemical soil binders, jute netting, or other methods approved in advance by the SLOAPCD.
- g. All roadways, driveways, sidewalks, etc. to be paved will be completed as soon as possible. In addition, building pads will be laid as soon as possible after grading unless seeding or soil binders are used.
- h. Vehicle speed for all construction vehicles will not exceed 15 mph on any unpaved surface at the construction site.
- i. All trucks hauling dirt, sand, soil, or other loose materials are to be covered or will maintain at least two feet of freeboard (minimum vertical distance between top of load and top of trailer) in accordance with California Vehicle Code (CVC) Section 23114.
- j. Install wheel washers where vehicles enter and exit unpaved roads onto streets, or wash off trucks and equipment leaving the site.
- k. Sweep streets at the end of each day if visible soil material is carried onto adjacent paved roads. Water sweepers with reclaimed water should be used where feasible.
- l. If visible emissions of fugitive dust persist beyond a distance of 200 feet from the boundary of the construction site, all feasible measures shall be implemented to eliminate potential nuisance conditions at off-site receptors (e.g., increase frequency of watering or dust suppression, install temporary wind breaks where appropriate, suspend excavation and grading activity when winds exceed 25 mph)
- m. The contractor will designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties will include holidays and weekend periods when work may not be in progress. The name and telephone number of such persons will be provided to the SLOAPCD prior to the start of construction.

5.9-C5

If the above mitigation measures do not bring the construction emissions below the thresholds, off-site mitigation funds can be used to secure emission reductions from projects located in close proximity to this construction site. In this instance, emissions in excess of construction phase thresholds are multiplied by the cost effectiveness value defined in the State's current Carl Moyer Incentive Program

Guidelines to determine the off-site mitigation amount associated with the construction period. Examples of off-site emission reduction measures are contained in Section 5.9 of the 2003 CEQA Air Quality Handbook. The actual mix of mitigation measures that would be required to meet the reduction in NO_x to less than a total of 185 lbs per day or 6.0 tons per quarter over the term of construction, would be finalized and mutually agreed to by the Project Proponent and appropriate staff of the SLOAPCD prior to commencement of construction of the project.

Cumulative

Implementation of Mitigation Measures 5.9-C1 through 5.9-C5 are required.

Level of Significance After Mitigation

Project-Specific

Less than significant.

Cumulative

Less than significant.

Sensitive Receptors

Q5.9-D: The project may expose sensitive receptors to substantial pollutant concentrations.

Project Specific Impact Analysis

Collection System

Similar to Proposed Project 4, the collection system under the Preferred Project is a gravity system that consists of a combination of conventional gravity sewers (GS) and low-pressure grinder pumps (LPGP). As described in Table Q.5-1, the Preferred Project includes additional collection system facilities such as pump stations, standby power stations, and pipelines, as well as modifications to specific locations and size of facilities such as the central pump station, pipelines within streets, and pipelines crossing creeks compared to Proposed Project 4. Construction activities would occur on properties throughout the community that include sensitive land uses such as residential as well as along roadways that are adjacent to sensitive land uses. Similar to Proposed Project 4, the construction activities associated with the Preferred Project have the potential to expose sensitive receptors to substantial pollutant concentrations during the construction phase. Although the Preferred Project would be adding facilities, the addition to pollutant concentrations is nominal to the project as a whole, therefore, short-term exposure during construction activities is still considered potentially significant.

Similar to Proposed Project 4, during operation of the Preferred Project, the collection system would be primarily underground and would not have the potential to expose sensitive receptors to substantial pollutant concentrations. Therefore, the sensitive receptors that are located near the collection system

would experience less than significant impacts related to the long-term exposure to substantial pollutant concentrations.

Treatment Plant Site

Similar to Proposed Project 4, the proposed treatment plant facilities under the Preferred Project include treatment facilities, appurtenant structures and storage facilities located on the Tonini parcel. As described in Table Q.5-1, the Preferred Project will include an Oxidation Ditch or Biolac® facility that encompasses less area and requires substantially less grading than the facultative ponds proposed under Proposed Project 4. Due to the site's remoteness from sensitive receptors, construction activities associated with the proposed treatment plant facilities would not have a potential to expose nearby sensitive receptors to substantial pollutant concentrations. Therefore, similar to Proposed Project 4, construction activities associated with the proposed facilities at the treatment plant site under the Preferred Project would result in a less than significant impact related to the short-term exposure of sensitive receptors to substantial pollutant concentrations.

Since the operation of the treatment plant would not result in the generation of substantial pollutants as shown in Table 5.9-8 of the Draft EIR, no substantial pollutant concentrations would occur. Therefore, similar to Proposed Project 4, long-term operational activities would result in less than significant impacts related to the exposure of sensitive receptors to substantial pollutant concentrations generated under the Preferred Project.

Disposal Sites

Similar to Proposed Project 4, the proposed disposal systems under the Preferred Project include sprayfields at the Tonini parcel and leachfields at the Broderson parcel. Under the Preferred Project, the type of spray was revised to exclude percolation and as a result, approximately 73 more acres of sprayfields are proposed to accommodate the 842 acre-feet of spray at Tonini compared to Proposed Project 4.

Similar to Proposed Project 4, construction activities associated with the proposed sprayfield facilities at Tonini would not have a potential to expose nearby sensitive receptors to substantial pollutant concentrations due to the site's remoteness from sensitive receptors. Therefore, sprayfield construction activities would result a less than significant impact to sensitive receptors.

Similar to Proposed Project 4, the operation of the disposal site at Tonini under the Preferred Project would not result in the generation of substantial pollutants because no substantial pollutant concentrations would occur. Therefore, the sensitive receptors that are located in the vicinity of Tonini would experience less than significant impacts related to the long-term operations.

Combined Project Effects

Similar to Proposed Project 4, the proposed facilities at the treatment plant and sprayfields under the Preferred Project would be located on the Tonini parcel. The combination of the two facilities on the Tonini parcel could increase pollutant concentrations in the project vicinity, but due to the site's

remoteness from sensitive receptors, construction and operational activities would result in a less than significant pollutant concentrations impact to sensitive receptors.

Cumulative Impact Analysis

Similar to Proposed Project 4, the Preferred Project would not contribute to any cumulative exposure of pollutant concentrations during construction because there are no cumulative projects that would expose the same sensitive receptors as the Preferred Project.

Mitigation Measures

Project-Specific

Mitigation Measures 5.9-C1, 5.9-C2, and 5.9-C4 are required.

Cumulative

No mitigation measures are required.

Level of Significance After Mitigation

Project-Specific

Less than significant.

Cumulative

Less than significant.

Odors

Q5.9-E:	The project would not create objectionable odors affecting a substantial number of people.
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Project Specific Impact Analysis

Collection System

Similar to Proposed Project 4, the collection system under the Preferred Project is a gravity system. As described in Table Q.5-1, the Preferred Project includes additional collection system facilities such as pump stations, standby power stations, and pipelines, as well as modifications to specific locations and size of facilities such as the central pump station, pipelines within streets, and pipelines crossing creeks compared to Proposed Project 4. Although additions and modifications are proposed under the Preferred Project, the potential for odor would be the same as Proposed Project 4. During construction activities under the Preferred Project, off-road diesel equipment would be operated in close proximity to residences during the installation of the underground conveyance. Diesel exhaust could be emitted during construction, which may be objectionable to some; however, emissions would disperse rapidly from the project site. Therefore, similar to Proposed Project 4, odor impacts associated with construction activities of the Preferred Project would be less than significant.

In addition, similar to Proposed Project 4, the collection system associated with the Preferred Project has the potential for long-term operational odors at the pump stations. However, the pump stations are below ground and would include an odor control element to control odor. Therefore, similar to Proposed Project 4, the Preferred Project would result in less than significant odor impacts from the operation of the collection system.

Treatment Plant Site

Similar to Proposed Project 4, the proposed treatment plant facilities under the Preferred Project include treatment facilities, appurtenant structures and storage facilities located on the Tonini parcel. As described in Table Q.5-1, the Preferred Project will include an Oxidation Ditch or Biolac® facility. Similar to the collection system, the construction of the treatment plant would have off-road diesel equipment would be operated in close proximity to residences during construction of the treatment plant. Diesel exhaust could be emitted during construction, which may be objectionable to some; however, emissions would disperse rapidly from the project site. Therefore, similar to Proposed Project 4, odor impacts associated with the treatment plant construction activities of the Preferred Project would be less than significant.

Odor controls are a typical part of treatment plant facilities. Under Proposed Project 4, the method of odor control is a system based on inorganic media. Under the Preferred Project which includes the Oxidation Ditch or Biolac® facility, odor controls are also part of the treatment plant facility. The solids processing equipment would be enclosed within a building and an inorganic media air scrubber would trap and scrub the interior foul air before releasing it to the outside air. The headworks for the Oxidation Ditch or Biolac® system include a de-gritting system that typically involve enclosed tanks to prevent release of odors and for the safety of operations staff. The washed grit collected in the hopper is still a source of odors, but it is only localized that would be noticeable to onsite staff. It is unlikely that the washed grit collected in the hopper would produce sufficient odor to affect offsite receptors. Odor from the washed grit is not expected to be detectable at a distance of 200 feet from the hopper. Since the nearest residence is approximately 350 feet from the Tonini site, odor impacts on residences from the headworks would be less than significant. This less than significant finding is the same as the finding for potential odor impacts from the treatment plant facility proposed under Proposed Project 4.

Disposal Sites

Similar to Proposed Project 4, the proposed disposal systems under the Preferred Project include sprayfields at the Tonini parcel and leachfields at the Broderson parcel. Under the Preferred Project, the type of spray was revised to exclude percolation and as a result, approximately 73 more acres of sprayfields are necessary to accommodate the 842 acre-feet of spray at Tonini compared to Proposed Project 4. The Preferred Project also includes setbacks from Turri Road and the property south of Tonini, and Proposed Project 4 did not include setbacks. Although additional sprayfield areas are included under the Preferred Project, these additional sprayfield areas are located further from residences than the sprayfield areas under Proposed Project 4. Therefore, similar to Proposed Project

4, the construction and operation of the disposal facilities under the Preferred Project would result in less than significant odor impacts.

Combined Project Effects

Similar to Proposed Project 4, the operations of the proposed collection, treatment plant, and disposal facilities under the Preferred Project are designed to minimize odors throughout the system. In addition, construction activities would include diesel equipment, but the diesel exhaust would disperse rapidly and would not be at a level to induce a negative response. Therefore, similar to Proposed Project 4, the potential for operational and construction odor impacts under the Preferred Project would be less than significant.

Cumulative Impact Analysis

Similar to Proposed Project 4, the Preferred Project would result in less than significant odor impacts due to normal operations and construction. Since there are no related projects that would contribute to cumulative impacts, the Preferred Project would not contribute to cumulative impacts on creating objectionable odors.

Mitigation Measures

Project-Specific

No mitigation measures are required.

Cumulative

No mitigation measures are required.

Level of Significance After Mitigation

Project-Specific

Less than significant.

Cumulative

Less than significant.

Greenhouse Gas Emissions

Q5.9-F:	The project would not result in an increase in greenhouse gas emissions that would significantly hinder or delay the State's ability to meet the reduction targets contained in AB 32.
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Project Specific Impact Analysis

Construction

Similar to Proposed Project 4 and as amended in the Information Update dated December 19, 2008, greenhouse gas (GHG) emissions would be generated during construction activities of the Preferred Project's proposed collection system, treatment plant facilities, and disposal facilities. The largest change in GHG emissions from Proposed Project 4 (i.e., facultative ponds) would occur with the

reduced grading and construction activities associated with the Oxidation Ditch or Biolac® system. This change would result in a reduced amount of GHG emissions. The Preferred Project also includes additions and modifications to the collection system as well as the increased area of the sprayfield that would result in an increase in GHG emissions. Overall, the GHG construction emissions associated with the Preferred Project are expected to be less than the GHG emissions associated with Proposed Project 4. Similar to Proposed Project 4, the Preferred Project would result in a less than significant GHG impact during construction.

Operational

As with Proposed Project 4 and as amended in the Information Update dated December 19, 2008, GHG emissions associated with the Preferred Project would be generated during the operation of the collection system and treatment plant facilities. Similar to construction GHG emissions, the largest operational change in GHG emissions for the Preferred Project is the inclusion of the Oxidation Ditch or Biolac® system compared to a facultative pond system under Proposed Project 4. This change would result in less GHG emissions at the treatment plant under the Preferred Project compared to Proposed Project 4. The Preferred Project also included additions and modifications to the collection system; however, the GHG emissions associated with these changes would still result in an overall reduction of operational GHG emissions for the Preferred Project compared to Proposed Project 4. Unlike Proposed Project 4 as amended in the Information Update dated December 19, 2008, the operational activities of the facilities associated with the Preferred Project would contribute to a beneficial impact on GHG emissions because these emissions would be less than the operational emissions associated with the existing system.

Cumulative Impact Analysis

Similar to Proposed Project 4, the Preferred Project would increase GHG emissions during construction activities and reduce operational GHG emissions compared to the existing wastewater system. Therefore, the Preferred Project's overall contribution to GHG emissions is considered less than cumulatively considerable similar to Proposed Project and as amended in the Information Update dated December 19, 2008. Thus, similar to Proposed Project 4, the Preferred Project would result in a less than significant impact on cumulative GHG emissions.

Mitigation Measures

Project-Specific

No mitigation measures are required.

Cumulative

No mitigation measures are required.

Level of Significance After Mitigation

Project-Specific

Less than significant.

Cumulative

Less than significant.

Conflict with Local Goals and Policies

Q5.9-G: **The project would not conflict with local goals and policies in the General Plan.**

Project Specific Impact Analysis

The County of San Luis Obispo does not have any air quality goals or policies in the current adopted General Plan that are relevant to Preferred Project. Therefore, similar to Proposed Project 4, the Preferred Project would not impact any County General Plan air quality goals or policies.

Cumulative Impact Analysis

Similar to Proposed Project 4, the Preferred Project would not impact currently adopted General Plan air quality goals or policies, and therefore, would not contribute to cumulative impacts on air quality goals or policies.

Mitigation Measures

Project-Specific

No mitigation measures are required.

Cumulative

No mitigation measures are required.

Level of Significance After Mitigation

Project-Specific

No impact.

Cumulative

No impact.