5.3. Air Quality

AIR QUALITY Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
(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 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?	☐	☐	☒	☐

Significance criteria established by CEQA Guidelines, Appendix G.

5.3.1. Setting

Criteria Pollutants. Air quality is determined by measuring ambient concentrations of certain criteria air pollutants. The criteria air pollutants are those pollutants for which acceptable levels of exposure can be determined and for which standards have been set. The criteria air pollutants are ozone, respirable particulate matter (PM10), fine particulate matter (PM2.5), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. Criteria pollutants include primary pollutants that are directly emitted, and secondary emissions that are formed in the atmosphere by chemical and photochemical reactions. Ozone is an example of a secondary pollutant that is not emitted directly from a source (e.g., an automobile tailpipe). It is formed in the atmosphere by reactions involving reactive organic compounds (ROC) and nitrogen oxides (NOx), which are regulated as precursors to ozone formation.

The degree of air quality degradation is then compared to the health-protective National and California Ambient Air Quality Standards (NAAQS and CAAQS). Unique meteorological conditions in California and differences of opinion by medical panels established by the California Air Resources Board (CARB) and the U.S. Environmental Protection Agency (U.S. EPA) cause considerable diversity between State and Federal standards currently in effect in California. In general, the CAAQS are more stringent than the corresponding NAAQS. The standards currently in effect in California are shown in Table 5.3-1.

Table 5.3-1. National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards
Ozone	1 hour	0.09 ppm	—
	8 hour	0.070 ppm	0.075 ppm
Respirable Particulate Matter (PM_{10})	24 hour	50 µg/m^3	150 µg/m^3
	Annual Mean	20 µg/m^3	—
Fine Particulate Matter ($PM_{2.5}$)	24 hour	—	35 µg/m^3
	Annual Mean	12 µg/m^3	15 µg/m^3
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm
	8 hour	9.0 ppm	9.0 ppm
Nitrogen Dioxide (NO_2)	1 hour	0.18 ppm	—
	Annual Mean	0.030 ppm	0.053 ppm

Pollutant	Averaging Time	California Standards	National Standards
Sulfur Dioxide (SO_2)	1 hour	0.25 ppm	—
	24 hour	0.04 ppm	0.14 ppm
	3 hour	—	0.5 ppm
	Annual Mean	—	0.03 ppm

Notes: ppm=parts per million; µg/m3= micrograms per cubic meter; "—" =no standard
Source: CARB (http://www.arb.ca.gov/research/aaqs/aaqs2.pdf), November, 2008.

Attainment Status and Air Quality Plans. The U.S. EPA, California Air Resource Board (CARB), and the local air district classify an area as attainment, unclassified, or nonattainment. The classification depends on whether the monitored ambient air quality data show compliance, insufficient data available, or non-compliance with the ambient air quality standards, respectively. The proposed Project would be located within the City of Goleta, in Santa Barbara County under the jurisdiction of the Santa Barbara Air Pollution Control District (SBAPCD). Table 5.3-2 summarizes attainment status for the criteria pollutants in Santa Barbara County with both the federal and state standards.

Table 5.3-2. Attainment Status for Santa Barbara County

Pollutant	State Designation	Federal Designation
Ozone (1hr and 8 hr)	Nonattainment	Attainment/Unclassified
PM_{10}	Nonattainment	Unclassified
$PM_{2.5}$	Attainment	Attainment/Unclassified
CO	Attainment	Attainment/Unclassified
NO_2	Attainment	Attainment/Unclassified
SO_2	Attainment	Attainment/Unclassified

Source: SBCAPCD, 2025

Valley Fever

Coccidioidomycosis, often referred to as San Joaquin Valley Fever or Valley Fever, is a fungal infection that varies with the season and most commonly affects people who live in hot dry areas with alkaline soil. This disease affects both humans and animals and is caused by inhalation of arthroconidia (spores) of the fungus *Coccidioides immitis*. *Coccidioides immitis* spores are found in the top few inches of soil, and the existence of the fungus in most soil areas is temporary. The cocci fungus lives as a saprophyte (an organism, especially a fungus or bacterium, which grows on and derives its nourishment from dead or decaying organic matter) in dry, alkaline soil. When weather and moisture conditions are favorable, the fungus "blooms" and forms many tiny spores that lie dormant in the soil until they are stirred up by wind, vehicles, excavation, or other ground-disturbing activities and become airborne. Agricultural workers, construction workers, and other people who are outdoors and are exposed to wind, dust, and disturbed topsoil are at an elevated risk of contracting Valley Fever. African Americans, Asians, women in the third trimester of pregnancy, and persons whose immunity is compromised are most likely to develop the most severe form of the disease (California Department of Public Health [CDPH], 2019).

The proposed Project is located in the Central Coast region of California, which is an area of California where relatively high numbers of cases of Valley Fever are reported. Data from 2023 show the incident rate in Santa Barbara County was 19.7 in 100,000 with 88 total cases, though the relative standard error of the data is 23% or higher (CDPH, 2023).

Toxic Air Contaminants

Toxic air contaminants (TACs) are air pollutants that may lead to serious illness or increased mortality, even when present in relatively low concentrations. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs do not have ambient

air quality standards but are regulated by the local air districts using a risk-based approach. Diesel particulate matter (DPM) is classified as a TAC, and statewide and local programs focus on managing this pollutant through motor vehicle fuels, engine, and tailpipe standards because many toxic compounds adhere to diesel exhaust particles. The proposed Project is not considered a stationary source subject to risk assessment programs.

Sensitive Receptors

Residential areas, day care centers, hospitals, and schools are some examples of sensitive receptors. Sensitive receptors include facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. The BESS operational area is approximately 200 feet northeast of the Mariposa at Ellwood Shores elder care facility on the east side of Viajero Drive. Other nearby receptors include the Hideaway residential neighborhood located approximately 300 feet west (west of the EGS and Las Armas Road) and Ellwood Elementary School located approximately 500 feet east.

5.3.2. Regulatory Background

Federal

Clean Air Act. The federal Clean Air Act (CAA) establishes the statutory framework for regulation of air quality in the United States. Under the CAA, the U.S. EPA oversees implementation of federal programs for permitting new and modified stationary sources, controlling toxic air contaminants, and reducing emissions from motor vehicles and other mobile sources.

Title I (Air Pollution Prevention and Control) of the federal CAA requires establishment of National Ambient Air Quality Standards (NAAQS) for criteria pollutants, air quality designations, and plan requirements for nonattainment areas. States are required to submit a state implementation plan (SIP) to the U.S. EPA for areas in nonattainment with NAAQS. The SIP, which is reviewed and approved by the U.S. EPA, must demonstrate how state and local regulatory agencies will institute rules, regulations, and/or other programs to attain NAAQS over time.

State

U.S. EPA/CARB Off-Road Mobile Sources Emission Reduction Program. The California Clean Air Act mandates that CARB achieve the maximum degree of emission reductions from all off-road mobile sources in order to attain the state ambient air quality standards. Off-road mobile sources include construction equipment. Tier 1 standards for large compression-ignition engines used in off-road mobile sources went into effect in California in 1996. These standards and ongoing rulemaking jointly address emissions of nitrogen oxides (NOx) and toxic particulate matter from diesel combustion. CARB is also developing a control measure to reduce diesel particulate matter emissions as well as NOx from in-use (existing) off-road diesel equipment throughout the State.

ARB In-Use Off-Road Diesel-Fueled Fleets Regulation. The regulation for in-use off-road diesel-fueled fleets is designed to reduce mobile-source NOx and toxic DPM. Depending on the size of the fleet of equipment, the fleet owner must ensure that the average emissions performance of the fleet meets certain statewide standards. In lieu of improving the emissions performance of the fleet, electric systems can be installed to replace diesel equipment in the fleet's average calculations. Presently, all equipment owners are subject to a five-minute idling restriction in the rule (Cal. Code Regs., tit. 13, § 2449).

CARB Portable Equipment Registration Program. This program allows owners or operators of portable engines and associated equipment commonly used for construction or farming to register their units

under a statewide portable program that allows them to operate their equipment throughout California without having to obtain individual permits from local air districts.

ARB Airborne Toxic Control Measures (ATCM). Diesel engines on portable equipment and vehicles are subject to various ATCMs that dictate how diesel sources must be controlled statewide. For example, the ATCM to Limit Diesel-Fueled Commercial Motor Vehicle Idling generally limits idling of commercial motor vehicles (including buses and trucks) within 100 feet of a school or residential area for more than five consecutive minutes or periods aggregating more than five minutes in any one hour (Cal. Code Regs., tit. 13, § 2485). Diesel engines used in portable equipment fleets are subject to stringent DPM emissions standards, generally requiring use of only newer engines or verified add-on particulate filters (Cal. Code Regs., tit. 17, § 93116).

Local

Santa Barbara County Air Pollution Control District

The SBCAPCD is responsible for planning, implementing, and enforcing federal and state ambient air quality standards in Santa Barbara County and for permitting and controlling stationary sources and TAC pollutants. The SBCAPCD's Rules regulate sources of air pollution in Santa Barbara County. The SBCAPCD rules that may be applicable to the proposed Project are identified below.

SBCAPCD Rule 302 – Visible Emissions. This rule prohibits discharge of air contaminants or other material that are as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or that obscure an observer's view.

SBCAPCD Rule 303 – Nuisance. This rule prohibits discharge of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or that endanger the comfort, repose, health, or safety of any such persons or the public; or that cause, or have a natural tendency to cause, injury or damage to business or property.

Currently, the SBCAPCD does not have daily or quarterly quantitative emission thresholds established for short-term construction emissions. Emissions from construction activities are normally short-term and subject to standardized emission control strategies.

Although quantitative thresholds of significance are not currently in place for short-term or construction emissions, the SBCAPCD recommends that construction projects that would not emit more than 25 tons per year of any pollutant shall not be required to obtain An Authority to Construct or Permit to Operate. APCD Rule 202(D)(16), related to permits and exemptions, states:

> *Notwithstanding any exemption in these rules and regulations, if the combined emissions from all construction equipment used to construct a stationary source which requires an Authority to Construct have a projected actual in excess of 25 tons of any pollutant, except carbon monoxide, in a 12 month period, the owner of the stationary source shall provide offsets as required under the provisions of Rule 804, Emission Offsets, and shall demonstrate that no ambient air quality standard would be violated.*

The SBCAPCD Board adopted significance thresholds (SBCAPCD, 2015) for the operation of a project as not having a significant impact on air quality if the project would:

- Emit (from all project sources, both stationary and mobile) less than the daily trigger for offsets or Air Quality Impact Analysis set in the APCD New Source Review Rule, for any pollutant (i.e., 240 lb/day for Reactive Organic Compounds (ROC) or NOX; and 80 lb/day for PM10. There is no daily operational threshold for CO; it is an attainment pollutant).
- Emit less than 25 lb/day NOx or ROC from motor vehicle trips only.

- Not cause or contribute to a violation of any CAAQS or NAAQS (except ozone).
- Not exceed the APCD health risk public notification thresholds adopted by the APCD Board (10 excess cancer cases in a million) for cancer risk and not exceed a Hazard Index of 1.0 for non-cancer risk.
- Be consistent with the latest adopted federal and state air quality plans for Santa Barbara County (SBCAPCD, 2017).

City of Goleta

The City of Goleta adopted local CEQA guidelines in August 2008. The Environmental Review Guidelines set procedures for complying with CEQA, to protect both local and regional resources while reflecting local values. The City's Environmental Review Guideline's Air Quality Thresholds adopt the SBCAPCD Environmental Review Guidelines, which are outlined above. Additional dust control rules as defined by the SBAPCD and listed above include Rule 302 – Visible Emissions and Rule 303 – Nuisance. Additional SBAPCD rules include Rule 201 – Permits Required, and Rule 345 – Control of Fugitive Dust from Construction and Demolition Activities. Standard dust control measures required by the SBAPCD are included below. No additional AQ thresholds are set by the City.

5.3.3. Environmental Impacts and Mitigation Measures

Thresholds of Significance

A significant air quality impact could occur if the proposed project resulted in any of the impacts noted in the above checklist.

A significant air quality impact could occur if the proposed Project resulted in any of the impacts noted in the above checklist. In addition, pursuant to the County of Santa Barbara's Environmental Thresholds and Guidelines Manual (2021), which has been adopted by the City of Goleta (adopted by Resolution 08-40), a significant adverse air quality impact may occur when a project, individually or cumulatively, triggers either of the following:

Threshold AQ-1. Interfere with progress toward the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NOX (nitrogen oxides) and ROC (reactive organic compounds; same as reactive organic gases [ROG]). Thresholds are 25 pounds/day of either NOX or ROC.

Threshold AQ-2. Equals or exceeds the state or federal ambient air quality standards for any criteria pollutant (as determined by modeling).

Threshold AQ-3. Results in toxic or hazardous pollutants in amounts which may increase cancer risks for the affected population.

Threshold AQ-4. Causes an odor nuisance problem impacting a considerable number of people.

Additionally, the SBCAPCD thresholds, listed above, are considered appropriate for use as a guideline for the impact analysis.

Impact Analysis

Threshold AQ-1 is addressed in Checklist Items (a) and (b), Threshold AQ-2 is addressed in Checklist Item (b), Threshold AQ-3 is addressed in Checklist Item (c), and Threshold AQ-4 is addressed in Checklist Item (d).

(a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. The SBCAPCD 2022 Ozone Plan identifies measures to attain the state ozone standard standards. The SBCAPCD 2022 Ozone Plan includes an "every feasible measure"

strategy to ensure progress towards attainment. Over 30 control measures have been adopted or amended to reduce ozone precursors, generally focusing on coatings, residential heaters and boilers, and industrial oil and gas processes. Proposed Project activities in the City of Goleta would be subject to the SBCAPCD rules and regulations and implementing the Ozone Plan control measures to ensure that the activities conform with local ozone attainment strategies. This would include but not be limited to, Rule 201 – Permits Required, Rule 302 – Visible Emissions, Rule 303 – Nuisance, Rule 306-Dust and Fumes, and Rule 345 – Control of Fugitive Dust from Construction and Demolition Activities. All construction activities would be required to comply with all applicable SBCAPCD rules, regulations, and programs. Impacts would be less than significant.

During decommissioning, activities would be similar to construction, except materials would be removed and exported from the site, rather than imported, and therefore impacts during decommissioning would be similar. Impacts would be less than significant.

DURING OPERATION, *LESS THAN SIGNIFICANT*. Operation of the proposed Project would be required to comply with all applicable air pollution control rules and regulations. The Project would typically generate 1-2 trips a week on average, and up to 10 vehicle trips per week at a maximum during the first year of BESS facility operation for equipment inspection and maintenance purposes. Vehicle trips may be reduced after the Project's first year of operation because the first year of operations typically includes more start up activities such as commissioning and system testing, performance optimization, and the resolution of initial issues, which are often resolved within the first year of operations. Long-term operations would entail no water consumption and only minor air emissions from vehicle trips. Proposed Project activities in the City of Goleta would be subject to the SBCAPCD rules and regulations implementing the Ozone Plan control measures to ensure that the activities conform with local ozone attainment strategies. A Project could be found inconsistent with the applicable air quality management plan or attainment plan if it could cause population and/or employment growth or growth in vehicle-miles traveled in excess of the growth forecasts included in the air quality attainment plan. Since the Project would be unmanned, the Project would not require any new permanent full-time or part-time staff after construction is complete. Long-term operation of the BESS facility would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant.

(b) Would the project 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?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. The construction, commissioning and decommissioning-related increase in air pollutant emissions would occur in the regional context of the South Central Coast Air Basin (SCCAB) that is currently designated as "nonattainment" for ozone and PM10. Construction-phase activities include mobilizing vehicles and equipment for construction, crews, and materials. The site work would include site preparation and minor vegetation clearing, rough and fine grading, installing the BESS foundations and BESS enclosures, laying the underground electrical collection and communication lines, assembling accessory electrical components including transformers, and installing high-voltage equipment such as the generation-tie line. These activities during construction would generate emissions at the work area and along the roadways used to access the site. Immediately following the completion of construction, commissioning would occur, and would not include any off-road equipment, nor any heavy-duty vehicles, and would consist of up to 15 passenger vehicle trips daily to transport employees to and from the site. Emissions associated with these vehicle trips would be much lower than calculated construction emissions. The decommissioning work would include removal of battery units from the foundations, disconnection of wiring, and transport of the battery units to an approved recycling facility. Construction is expected to take approximately 8 months. Commissioning is expected to take 3 to 4 months. The peak number of construction personnel would be 20 workers.

Construction, commissioning and decommissioning emissions would be caused by exhaust from vehicles and equipment and fugitive dust from ground-disturbing activities. The mobile sources would be a mix of diesel-powered off-road construction equipment types, including: cranes, dozers, graders, excavators, loaders, and tractors. On-road mobile sources would include diesel and gasoline-powered vehicles for linework and trucks for deliveries of concrete, water, and other materials. Outside of the work site, construction, commissioning and decommissioning traffic would cause exhaust emissions from the trucks and other vehicles used by crews, materials, and equipment to access the work site. Table 4-5 in the Project Description includes a summary of equipment and truck trips used to calculate the construction emissions presented in Table 5.3-1. Additional calculation details can be found in Appendix D, Air Quality and Greenhouse Gas Report.

Table 5.3-1. Maximum Daily Construction Emissions (lbs/day)

Construction	VOC	NOx	CO	SO_2	PM10	PM2.5
Maximum Daily Construction Emissions	**18.0**	**11.4**	**16.0**	**0.04**	**1.02**	**0.41**
Threshold of Significance	**25***	**25***	**-**	**-**	**80**	**80**
Exceeds Threshold?	No	No	NA	NA	No	No

Source: SBCAPCD, 2017; and Appendix D, Air Quality and Greenhouse Gas Report

*NOx and ROC threshold includes emissions motor vehicle trips only, however, reported emissions include all construction phase emissions, and as such are conservative.

While SBCAPCD does not have daily construction thresholds, construction of the proposed Project would occur within one calendar year, and Table 5.3-1 shows that proposed Project construction emissions would not exceed SBCAPCD daily operational thresholds.

Table 5.3-2. Annual Construction Emissions (tons/year)

Construction	VOC	NOx	CO	SO_2	PM10	PM2.5
Maximum Daily Construction Emissions	**0.33**	**0.46**	**0.66**	**0.001**	**0.03**	**0.02**
Threshold of Significance	**25**	**25**	**25**	**25**	**25**	**25**
Exceeds Threshold?	No	No	NA	NA	No	No

Source: SBCAPCD, 2017; and Appendix D, Air Quality and Greenhouse Gas Report

Table 5.3-2 shows that proposed Project construction would not exceed SBCAPCD's annual thresholds, and as such impacts are less than significant.

Although construction related emissions would not exceed suggested SBAPCD's thresholds, SBAPCD requires implementation of the following standard dust control measures for all discretionary projects involving earth moving activities:

(a) During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 miles per hour. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.

(b) The amount of disturbed area shall be minimized, and on-site vehicle speeds shall be reduced to 15 miles per hour or less.

(c) If import, export, and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.

(d) Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
(e) After clearing, grading, earth moving, or excavation is completed, the disturbed area shall be treated by watering, revegetating, or spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
(f) The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off-site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SBCAPCD prior to grading/building permit issuance and/or map clearance.

With implementation of required dust control measures, less than significant short term emissions would be reduced to the extent feasible, and potential dust nuisance impacts to surrounding land uses would also be less than significant.

During decommissioning, activities would be similar to construction, except materials would be removed and exported from the site, rather than imported, and therefore impacts during decommissioning would be similar. Impacts would be less than significant.

DURING OPERATION, *LESS THAN SIGNIFICANT*. Potential emissions related to proposed Project operation would be limited to deliveries and transportation to and from the site for maintenance activities. The batteries themselves would not result in air pollutant emissions. Operations at the proposed Project site would be minimal as the BESS facility would be unstaffed. The proposed Project would typically generate 1-2 trips a week on average, and up to 10 vehicle trips per week at a maximum during the first year of BESS facility operation for equipment inspection and maintenance purposes. Vehicle trips may be reduced after the Project's first year of operation. Operation phase emissions would thus be minimal and far less than construction phase emissions. This impact would be less than significant, and no mitigation would be required during operations.

(c) Would the project expose sensitive receptors to substantial pollutant concentrations?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. Construction, commissioning and decommissioning would generate toxic air contaminants routinely found in the exhaust of gasoline powered motor vehicles and of diesel-fueled equipment, including diesel particulate matter (DPM). The proposed Project would not involve any permanent or stationary sources of air pollution, but construction would temporarily bring construction equipment onto the proposed Project site and onto roadways accessing the site. The nearest sensitive receptors are approximately 200 feet northeast of the Mariposa at Ellwood Shores elder care facility on the east side of Viajero Drive.

Short-term emissions associated with construction, commissioning and decommissioning would occur onsite and along the roadways accessing the work areas. The proposed activities include mobilizing vehicles and equipment for construction, crews, and materials. The site work would include site preparation and minor vegetation clearing, rough and fine grading, installing the BESS foundations and BESS enclosures, laying the underground electrical collection and communication lines, assembling accessory electrical components including transformers, and installing high-voltage equipment such as the generation-tie line. Construction equipment and vehicles would access and move within the proposed Project site throughout the short construction duration of approximately eight months. Commissioning would occur over a 3-to-4-month period. Construction emissions would be limited in duration and as such this minimizes the potential that any receptor would be exposed to substantial pollutant concentrations.

Toxic Air Contaminants (TAC) Health Risk Analysis

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. TAC emissions, primarily in the form of diesel particulate matter, would occur during the short-term construction period, and then intermittently during the limited

operations and maintenance activities required for the proposed Project. Additionally, construction equipment using diesel fuel would be subject to the ARB In-Use Off-Road Diesel-Fueled Fleets Regulation and other controls including limitations on idling. As a result, and as noted in Table 5.3-1 and Table 5.3-2 (PM10 reported is the total fugitive PM10 and exhaust PM10, so exhaust PM would be even lower than the reported values seen in the aforementioned tables), the amount of diesel particulate matter that would be emitted from the proposed Project's activities would be minimal in comparison with the thresholds for PM10 and PM2.5. The potential exposure of sensitive receptors to diesel particulate matter emissions would be limited, as it would occur primarily during the limited construction period. The Project's construction and operation TAC emissions would cause less than significant health risk impacts.

Since off-road heavy-duty diesel equipment would only be used temporarily during construction, construction would not expose sensitive receptors to substantial emissions of TACs, and this impact would be less than significant.

Construction contractors would be required to follow the practices outlined in District Rule 302 Visible Emissions and 303 Nuisance, which would minimize the emissions of dust. This would ensure that receptors would not be exposed to substantial concentrations. Impacts would be less than significant.

DURING OPERATION, *LESS THAN SIGNIFICANT*. Potential emissions related to proposed Project operation would be limited to deliveries and transportation to and from the site for maintenance activities. The batteries themselves would not result in any air emissions. Operations at the proposed Project site would be minimal because the site would be operated remotely. Operation phase emissions would be less than construction phase emissions. The operation-phase emissions would not expose sensitive receptors to substantial pollutant concentrations and would have less than significant impacts.

(d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

DURING CONSTRUCTION, *LESS THAN SIGNIFICANT*. The Project would not include any sources likely to create objectionable odors. Construction, commissioning and decommissioning would involve the temporary use of vehicles and construction equipment and materials, such as fuels, that may generate intermittent, minor odors. Odors that occur in equipment exhaust would be minimized by mandatory use of ultra-low sulfur diesel fuel. These emissions would occur briefly during construction, commissioning and decommissioning and would cease at the end of those activities. There would be no notable impact of objectionable odors affecting a substantial number of people. This impact would be less than significant, and no mitigation is required.

DURING OPERATION, *LESS THAN SIGNIFICANT*. Land uses that are likely to produce odors include operations associated with agriculture, waste management, refineries, wastewater treatment, and certain chemical and manufacturing plants. The proposed Project does not include any manufacturing or agricultural uses and would not emit objectionable odors. Impacts would be less than significant with no mitigation required.

5.3.3.1. Impact Conclusions and Mitigation Measures

The proposed Project would not result in significant air quality impacts, and thus, no mitigation measures are recommended.