



# RESOURCE MANAGEMENT AGENCY

5961 SOUTH MOONEY BLVD  
VISALIA, CA 93277  
PHONE (559) 624-7000  
FAX (559) 730-2653

Aaron R. Bock Economic Development and Planning  
Reed Schenke Public Works  
Sherman Dix Fiscal Services

REED SCHENKE, DIRECTOR

MICHAEL WASHAM, ASSOCIATE DIRECTOR

## TECHNICAL MEMORANDUM AIR QUALITY AND GREENHOUSE GAS ASSESSMENT

**DATE:** September 16, 2021

**TO:** Hector Guerra, Chief Environmental Planner

**FROM:** Jessica Willis, Planner IV

**SUBJECT:** Air Quality and Greenhouse Gas Assessment for the Cutler-Orosi Community Plan 2021 Update (SCH# 2021040258)

### PURPOSE AND NEED FOR ASSESSMENT

This document is intended to assist Tulare County Resource Management Agency (RMA) staff in the preparation of the Air Quality and Greenhouse Gas components of the Environmental Impact Report (EIR) being prepared for the Cutler-Orosi Community Plan 2021 Update (Project, Plan or Plan Update). The assessments have been conducted within the context of the California Environmental Quality Act (CEQA, California Public Resources Code Sections 21000, et seq.) and are intended to provide the County with sufficient detail regarding potential impacts of the Project implementation and to identify mitigation measures, if necessary, to reduce potentially significant impacts.

### Air Quality Assessment

The air quality assessment provided in this document was prepared to evaluate whether the air pollutant emissions generated from implementation of the Project would cause significant impacts to air quality and nuisance odor or health risks to nearby receptors. The estimated emissions are compared to federal and state ambient air quality standards (AAQS) and the thresholds of significance established by the San Joaquin Valley Air Pollution Control District (Air District or District). The methodology for the air quality assessment follows Air District recommendations for quantification of emissions and evaluation of potential impacts as provided in their guidance document *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI), adopted March 19, 2015.<sup>1</sup>

<sup>1</sup> San Joaquin Valley Air Pollution Control District (Air District). *Guidance for Assessing and Mitigating Air Quality Impacts* (GAMAQI). March 19, 2015. Accessed September 2021 at: <https://www.valleyair.org/transportation/GAMAQI.pdf>.

## **Greenhouse Gas Assessment**

The greenhouse gas (GHG) assessment provided in this document was prepared to evaluate whether the estimated GHG emissions generated from the implementation of the Project would cause significant impacts on global climate change. The methodology follows Air District recommendations for quantification of GHG emissions and evaluation of potential impacts on global climate change as provided in the GAMAQI, as well as their guidance document *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Project under CEQA* (GHG Guidance), adopted December 17, 2009.<sup>2</sup>

## **PROJECT DESCRIPTION**

Cutler and Orosi are currently designated as Unincorporated Communities in the 2030 Tulare County General Plan 2030 Update (General Plan).<sup>3</sup> The objective of the Cutler-Orosi Community Plan Update (Plan or Plan Update) is to develop a plan, which can accurately reflect the needs and priorities of the unincorporated communities of Cutler and Orosi. The Land Use and Circulation portions of this Plan provide the mechanism to minimize or avoid the potential adverse impacts of urban growth. The development of an orderly, harmonious land use pattern and appropriate implementation measures are designed to reduce potential conflict between neighboring uses across Tulare County's 2030 planning horizon, consistent with the Tulare County General Plan. The Community Plan Update is needed to increase the availability of infrastructure funding, such as drinking water system improvements (wells, water distribution piping, storage tanks, etc.), wastewater system (such as piping, lift stations, etc.), and public work/safety improvements (such as curbs, gutters, sidewalks, etc.), and to stimulate economic development within the community.

Tulare County is proposing new land use and zoning designations within an expanded Urban Development Boundary (UDB). The proposed Community Plan Update, if adopted, will update these designations to be consistent with the General Plan, and will bring existing non-compliant properties into conformity with the Tulare County Zoning Ordinance. The Community Plan also includes the Complete Streets and Road Maintenance programs and the community's anticipated growth through year 2030 based on the existing land uses, census population data, and the projected 1.3% annual growth rate in unincorporated areas of Tulare County. Other than the Complete Streets and Road Maintenance Programs, there are no specific development projects (such as residential, commercial, or industrial uses) proposed as part of this Project. As an unknown number of proposals may occur within the lifetime of the Plan, the Plan is intended to direct the density, intensity, and types of growth needed to meet the needs of the community. Future developments within the Project planning area will be required to undergo additional CEQA evaluation on a project-by-project basis at such time development is proposed to determine potential environmental impacts.

---

<sup>2</sup> Air District. *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Project under CEQA* (GHG Guidance). December 17, 2009. Accessed September 2021 at: <https://www.valleyair.org/Programs/CCAP/12-17-09/3%20CCAP%20-%20FINAL%20LU%20Guidance%20-%20Dec%2017%202009.pdf>.

<sup>3</sup> Tulare County. *General Plan 2030 Update*. August 2012. Accessed September 2021 at: <http://generalplan.co.tulare.ca.us/documents/GP/001Adopted%20Tulare%20County%20General%20Plan%20Materials/000General%20Plan%202030%20Part%20I%20and%20Part%20II/GENERAL%20PLAN%202012.pdf>.

## Growth Projections

There are no specific development projects proposed with the Cutler-Orosi Community Plan; however, the Plan does include updates to land use designations that could increase the buildout potential of the planning area. Population and residential growth through planning horizon year 2030 was estimated by applying a 1.3% annual growth rate, consistent with the Tulare County General Plan, to the 2017 baseline population and housing data, as provided by the United States Census Bureau.<sup>4,5</sup> Non-residential growth was estimated through planning horizon year 2030 for a worst-case emissions scenario by applying a 1.3% annual growth rate to the existing uses and assuming all parcels have been improved with structures at a floor to area ratio of 0.20. Using these assumptions for baseline conditions provides a conservative (larger) overall growth estimate. **Table 1** summarizes the projected growth of the community through horizon Year 2030.

Year	Residential <sup>1</sup>		Commercial / Public <sup>2</sup>		Retail <sup>2</sup>		Industrial <sup>2</sup>	
	Population	Dwelling Units	Square Feet	Acres	Square Feet	Acres	Square Feet	Acres
2017	13,610	3,369	2,104,819	241.60	1,223,165	140.40	1,466,230	168.30
2030	16,099	3,985	2,489,646	285.77	1,446,798	166.07	1,734,302	199.07
Overall Growth	2,488	616	384,827	44.17	223,633	25.67	268,073	30.77

1 Projections based on 2017 American Community Survey data applying an annual growth rate of 1.3%.  
 2 Projections based on existing land uses assuming developments/improvements with a Floor to Area Ratio of 0.2 and annual growth rate of 1.3%.

## Complete Streets and Road Maintenance

The Cutler-Orosi Complete Streets and Road Maintenance Programs are included in the Circulation Element of the proposed Community Plan. The Complete Streets Program has thoroughly analyzed the alternative forms of transportation, including transit, bicycle ways, and pedestrian circulation. Improvements proposed in the Complete Streets Program include, but are not limited to, installation of streetlights, bus shelters, street signage and striping, curbs, gutters, sidewalks, drainage system, and utilities. Road maintenance activities vary by road segment dependent upon the condition of the road and may include chip seal, overlay resurfacing, and asphalt reconstructions.

**Table 2** summarizes the projected growth of the community through horizon Year 2030.

<sup>4</sup> United States Census Bureau. Cutler CDP, California. 2017: ACS 5-Year Estimates Subject Tables. ACS Demographic and Housing Estimates (Table DP05), <https://data.census.gov/cedsci/table?q=Cutler%20CDP,%20California&tid=ACSDP5Y2017.DP05>, and Households and Families (Table S1101) at <https://data.census.gov/cedsci/table?q=Cutler%20CDP,%20California%20Housing&tid=ACSST5Y2017.S1101>. Accessed September 2021.

<sup>5</sup> United States Census Bureau. Orosi CDP, California. 2017: ACS 5-Year Estimates Subject Tables. ACS Demographic and Housing Estimates (Table DP05) at <https://data.census.gov/cedsci/table?q=1600000US0654372&tid=ACSDP5Y2017.DP05>, and Households and Families (Table S1101) at <https://data.census.gov/cedsci/table?q=Orosi%20CDP,%20California,%20S1101&tid=ACSST5Y2017.S1101>. Accessed September 2021.

**Table 2. Complete Streets and Road Maintenance Programs**

Segment	Roadway	Limits		Distance (miles)	Repair Code	Repair Time (days)
		From	To			
<b>Cutler Complete Streets</b>						
1	George Road/2nd Drive	Avenue 407	State Route 63	0.50	CHIP	1
2	Avenue 408	Road 124	State Route 63	0.50	GRX	2
3	Railroad Drive	State Route 63	Road 124	0.55	CHIP	1
4	Avenue 404	State Route 63	Robert Road	0.40	GRX/OLAY	2
5	First Drive	State Route 63	Road 124	0.55	CHIP	1
<b>Orosi Complete Streets</b>						
1	Avenue 413	Road 124	State Route 63	0.50	GRX/OLAY	2
2	Avenue 419 1	TBD	TBD	0.75	---	---
3	Avenue 416	State Route 63	City of Dinuba	5.00	GRX/OLAY	20
4	Road 130 2	TBD	TBD	0.50	---	---
5	Road 124 3	TBD	TBD	1.00	---	---
<b>Road Maintenance Program</b>				15.00	CHIP/GRX/OLAY	29
<b>TOTAL REPAIRS / MAINTENANCE</b>				<b>25.25</b>		<b>58</b>
1 This road segment has not been determined; the assumed path for this analysis is Avenue 419, from Road 124 to Road 130. 2 This road segment has not been determined; the assumed path for this analysis is Road 130, from Tactacan Avenue to Avenue 416. 3 This road segment has not been determined; the assumed path for this analysis is Road 124, from Avenue 419 to Edward Avenue.						

## EMISSIONS MODELING

Criteria air pollutant and greenhouse GHG emissions can be estimated by using emission factors and a level of activity. Emission factors represent the emission rate of a pollutant given the activity over time; for example, grams of nitrogen oxides per horsepower per hour or over distance in grams per mile traveled. The California Air Resources Board (ARB) has published emission factors for on-road mobile vehicles/trucks in the EMFAC mobile source emissions model and emission factors for off-road equipment and vehicles in the OFFROAD emissions model. An air emissions model (or calculator) combines the emission factors and the various levels of activity and outputs the emissions for the various pieces of equipment.

### Emissions Model

The emissions model applied in this assessment was the California Emissions Estimator Model (CalEEMod) version 2016.3.2. CalEEMod “is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operation activities (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, the model identifies

mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user.”<sup>6</sup>

“The model is a comprehensive tool for quantifying air quality impacts from land use projects located throughout California. The model can be used for a variety of situations where an air quality analysis is necessary or desirable such as preparing California Environmental Quality Act (CEQA) or National Environmental Policy Act (NEPA) documents, conducting pre-project panning, and, verifying compliance with local air quality rules and regulations, etc.”<sup>7</sup>

Most importantly, the Air District uses CalEEMod when reviewing or preparing air impact assessments in compliance with provisions of Air District Rule 9510 (Indirect Source Review), California Environmental Quality Act (CEQA), and National Environmental Policy Act (NEPA), for projects within the San Joaquin Valley Air Basin. Therefore, CalEEMod was used to calculate construction- and operation-related emissions.

### **Modeling Assumptions**

There are no specific development projects proposed in the Plan Update. As such, Project-related emissions are based on the number of new residential units and square footage of new non-residential development projects anticipated for the communities between baseline Year 2017 and the Plan Update horizon Year 2030, and on the Complete Streets and Road Maintenance programs established for the communities (see **Tables 1 and 2**).

Construction-related emissions result from onsite and offsite activities. Onsite emissions principally consist of exhaust emissions from heavy-duty construction equipment and motor vehicle operation, fugitive dust from disturbed soil, and application of architectural coatings. Offsite emissions are caused by motor vehicle exhaust from delivery vehicles, worker traffic, and road dust. CalEEMod includes default modeling assumptions for the type and quantity of equipment used during construction along with estimates of hours of operation and length of construction for each building phase. One CalEEMod modeling run was conducted for the potential buildout of the Plan Update, and one modeling run was conducted for the Complete Streets and Road Maintenance programs. CalEEMod provides default construction fleet and construction timelines for site preparation, grading, building construction, paving, and architectural coatings. The default modeling assumptions for duration of construction-related activity and construction equipment used were used for the analysis since project-specific information is not available. CalEEMod does not include a land use specifically for roadways; as such, road improvement emissions were modeled as “Other Asphalt Surfaces.”

Operation-related emissions are those emissions that occur once the Project commences operation. Operation-related emissions are the result of direct and indirect emission related to the Project. The direct emissions include use of natural gas for cooking, water heating, and space heating, use of consumer products, use of architectural coatings for maintenance of structures, and operating gasoline powered landscape equipment. Indirect emissions are from motor vehicles that would travel to and from the Project site. Motor vehicle emissions refer to exhaust, tire wear, brake wear, and road dust emissions from the automobiles, trucks, buses, motorcycles,

---

<sup>6</sup> CalEEMod. Accessed September 2021 at <http://caleemod.com/>.

<sup>7</sup> Ibid.

etc. As CalEEMod calculates both construction and operation-related emissions, the modeling run performed to assess construction-related emissions associated with the buildout of the Plan Update also provides the emissions analysis for operation-related emissions. Default values were used, except where Air District-approved changes are accepted. Changes to defaults used in the analysis are provided in **Table 3**.

<b>Table 3. Changes to CalEEMod Defaults</b>	
<b>Change to Default</b>	<b>Reason for Change</b>
Project Characteristics: Land Use Setting	Although the future development will be located within the Urban Development Boundary, the rural land use was selected as the Project is within a relatively sparsely developed area.
Project Characteristics: Utility Company and Intensity Factors	Cutler & Orosi are located in the PG&E-serviced area of Tulare County. PG&E achieved the required RPS reduction for 2020.
Land Use: Population	The population numbers reflect the household size in the communities based on Census Bureau data for year 2017.
Operational – Mobile: Residential Vehicle Fleet	Air District accepted values
Mitigation – Construction: Water Exposed Area three Times Daily; Reduce Unpaved Road Vehicle Speed	Air District Regulation VIII compliance
Mitigation – Traffic: Low Density Suburban Project Setting; Increase Diversity; Improve Rural Pedestrian Network	Although the communities are located in a rural area, the area within the UDB is developed to an urban-like setting; Community boundaries are less than 1.5 mile in diameter – various uses are expected within the proposed UDB; Design features of future development projects require sidewalk installation
Mitigation – Area: Only Natural Gas Hearth; Use Low VOC Paint; Electric Landscape Equipment	Air District fireplace rule compliance; Air District coating requirement compliance; Air District accepted values
Mitigation – Water: Low Flow Fixtures (kitchen faucets, bathroom faucets, toilets and showers); Use Water-Efficient Irrigation Systems and Landscape	Current California Building Code; Model Water Efficient Landscape Ordinance

The total emissions are averaged over the life of the Plan Update and are then compared to the Air District’s annual criteria pollutant emissions significance thresholds for construction activity. The Community Plan Update is necessary to bring the Community Plan into compliance with the Tulare County General Plan and guide the communities’ future development in an appropriate manner. The anticipated growth identified in this assessment may not be fully realized by the General Plan horizon year 2030. Averaging the total construction- and operational-related emissions from the 14-year planning timeframe out over the remaining 8-year Project life of the General Plan provides a conservative estimate of annual emissions to compare against the Air District’s annual emission thresholds.

## **SIGNIFICANCE THRESHOLDS**

CEQA Guidelines define a significant effect on the environment as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project.<sup>8</sup> To determine if a project would have a significant impact on air quality and climate change, the type, level, and impact of criteria pollutant and GHG emissions generated by the project must be evaluated. Appendix G of the CEQA Guidelines provides the criteria (as Checklist Items) for evaluating potential impacts on the environment. The CEQA criteria and the Air District’s significance thresholds and guidance for evaluation are provided below.

### **Air Quality Plans**

The Air District has established thresholds of significance for criteria pollutant emissions. These thresholds are based on District New Source Review (NSR) offset requirements for stationary sources. “Stationary sources in the District are subject to some of the toughest regulatory requirements in the nation. Emission reductions achieved through implementation of District offset requirements are a major component of the District’s air quality plans. Thus, projects with emissions below the thresholds of significance for criteria pollutants would be determined to “Not conflict or obstruct implementation of the District’s air quality plan”.<sup>9</sup>

The Air District has three sets of significance thresholds based on the source of the emissions. According to the GAMAQI, “The District identifies thresholds that separate a project’s short-term emissions from its long-term emissions. The short-term emissions are mainly related to the construction phase of a project and are recognized to be short in duration. The long-term emissions are mainly related to the activities that will occur indefinitely as a result of project operations.”<sup>10</sup>

Long-term (operational) emissions are further separated into permitted and non-permitted equipment and activities. Stationary (permitted) sources that comply or will comply with Air District rules and regulations are generally not considered to have a significant air quality impact. Specifically, the GAMAQI states, “District Regulation II ensures that stationary source emissions will be reduced or mitigated to below the District’s significance thresholds... District implementation of New Source Review (NSR) ensures that there is no net increase in emissions above specified thresholds from New and Modified Stationary Sources for all nonattainment pollutants and their precursors. Furthermore, in general, permitted sources emitting more than the NSR Offset Thresholds for any criteria pollutant must offset all emission increases in excess of the thresholds....”<sup>11</sup>

The Air District’s significance thresholds are provided in **Table 4**.

---

<sup>8</sup> CEQA Guidelines §§ 15002(g), 15382. [https://www.califaep.org/docs/CEQA\\_Handbook\\_2021.pdf](https://www.califaep.org/docs/CEQA_Handbook_2021.pdf).

<sup>9</sup> Air District, GAMAQI, Section 7.12, Page 65.

<sup>10</sup> Air District, GAMAQI, Section 8.1, Page 75

<sup>11</sup> Air District, GAMAQI, Section 8.2.1, Page 76

<b>Table 4. Air District Criteria Pollutant Significance Thresholds</b>			
<b>Pollutant/ Precursor</b>	<b>Construction Emissions</b>	<b>Operational Emissions</b>	
		<b>Permitted Equipment and Activities</b>	<b>Non- Permitted Equipment and Activities</b>
	<b>Emissions (tpy)</b>	<b>Emissions (tpy)</b>	<b>Emissions (tpy)</b>
<b>CO</b>	100	100	100
<b>NOx</b>	10	10	10
<b>ROG</b>	10	10	10
<b>SOx</b>	27	27	27
<b>PM<sub>10</sub></b>	15	15	15
<b>PM<sub>2.5</sub></b>	15	15	15

Source: Air District, GAMAQI, Table 2, page 80; and <http://www.valleyair.org/transportation/0714-GAMAQI-Criteria-Pollutant-Thresholds-of-Significance.pdf>, accessed September 2021.

### **Air Quality Violations**

“Determination of whether project emissions would violate any ambient air quality standard is largely a function of air quality dispersion modeling. If project emissions would not exceed State and Federal ambient air quality standards at the project’s property boundaries, the project would be considered to not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The need to perform an air quality dispersion modeling analysis for any project (urban development, commercial, or industrial projects) is determined on a case-by-case basis depending on the level of emissions associated with the proposed project. If such modeling is found necessary, the project consultant should check with the District to determine the appropriate model and input data to use in the analysis. Specific information for assessing significance, including screening tools and modeling guidance is available on-line at the District’s website [www.valleyair.org](http://www.valleyair.org).”<sup>12</sup>

“The thresholds of significance for Ambient Air Quality are based on the California Ambient Air Quality Standard (CAAQS) and National Ambient Air Quality Standard (NAAQS). A project would be considered to have a significant impact if its emissions are predicted to cause or contribute to a violation of an ambient air quality standard by exceeding any of the following:

1. Any of the CAAQS, or
2. Any of the NAAQS, and if available, the associated Significant Impact Level (SIL).”<sup>13</sup>

**Table 5** provides the California and National Ambient Air Quality Standards.

<sup>12</sup> Air District, GAMAQI, Section 7.13, Page 65

<sup>13</sup> Air District, GAMAQI, Section 8.4, Page 90

**Table 5. Ambient Air Quality Standards**

Pollutant	Averaging Time	California Standards	National Standards	
		Concentration	Primary	Secondary
Ozone (O <sub>3</sub> )	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	---	Same as Primary
	8 Hour	0.070 ppm (137 µg/m <sup>3</sup> )	0.070 ppm* (137 µg/m <sup>3</sup> )	
Respirable Particulate Matter (PM <sub>10</sub> )	24 Hour	50 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>	Same as Primary
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>	---	
Fine Particulate Matter (PM <sub>2.5</sub> )	24 Hour	---	35 µg/m <sup>3</sup>	Same as Primary
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	12.0 µg/m <sup>3</sup>	15.0 µg/m <sup>3</sup>
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	35 ppm (40 mg/m <sup>3</sup> )	---
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )	9 ppm (10 mg/m <sup>3</sup> )	---
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )	---	---
Nitrogen Dioxide (NO <sub>2</sub> )	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	100 ppb (188 µg/m <sup>3</sup> )	Same as Primary
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )	0.053 ppm (100 µg/m <sup>3</sup> )	
Sulfur Dioxide (SO <sub>2</sub> )	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	75 ppb (196 µg/m <sup>3</sup> )	---
	3 Hour	---	---	0.5 ppm (1300 µg/m <sup>3</sup> )
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )	0.14 ppm (for certain areas)	---
	Annual Arithmetic Mean	---	0.030 ppm (for certain areas)	---
Lead	30 Day Average	1.5 µg/m <sup>3</sup>	---	---
	Calendar Quarter	---	1.5 µg/m <sup>3</sup> (for certain areas)	Same as Primary
	Rolling 3-Month Average	---	0.15 µg/m <sup>3</sup>	
Visibility Reducing Particles	8 Hour	Extinction of 0.23/km; visibility of 10 miles or more	No National Standards	
Sulfates	24 Hour	25 µg/m <sup>3</sup>		
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )		
Vinyl Chloride	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )		

\* The standard at the time of the GAMAQI was 0.075 ppm; the standard presented here was finalized on October 26, 2015.

Abbreviations: ppm = parts per million; mg/m<sup>3</sup> = milligram per cubic meter; µg/m<sup>3</sup> = micrograms per cubic meter.

Sources: Air District, GAMAQI, Table 3, page 91; ARB, <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, accessed September 2021

“The District ISR rule exempts small development projects (see Table 4 [of the GAMAQI]) from project-specific mitigation requirements. The District performed extensive analysis to identify small projects for which additional mitigation is not feasible. For instance, the exemptions include small residential housing developments of less than 50 units and commercial developments of less than 2,000 square feet. All projects on the exemption list emit less than 2 tons per year of either PM10 or NOx, which is substantially lower than the District’s 10-ton per year significance thresholds. Furthermore, as the tailpipe emissions from motor vehicles continue to decline, these projects will emit even less today than was estimated in 2005 when this rule was adopted. In addition, two tons per year is expected to result in daily emissions of less than the 100 lb/day screening level for either NOx or PM10 that the District has concluded that projects under the ISR exemption thresholds will have a less than significant impact on air quality. Consequently, projects below ISR applicability thresholds are not expected to exceed the thresholds of significance for criteria pollutants emissions (see Section 8.3 [of the GAMAQI]). In addition, projects below the ISR applicability thresholds are not expected to violate any air quality standards or contribute substantially to an existing or projected air quality violation and will not exceed the thresholds of significance for ambient air quality. In this case, the District concludes no emission calculation is needed and no ambient air quality analysis is required.”<sup>14</sup>

**Table 6** provides the Air District’s ambient air quality analysis (AAQA) screening levels for development projects. For projects that exceed the screening thresholds identified in **Table 6**, the Air District provides further guidance on how to evaluate the 100 pound per day screening level in their guidance document *Ambient Air Quality Analysis Project Daily Emissions Assessment*.<sup>15</sup>

<b>Table 6: AAQA Screening Levels For Development Project</b>	
<b>Development Project Type</b>	<b>Space / Size</b>
Residential	50 dwelling units
Commercial	2,000 square feet
Light Industrial	25,000 square feet
Heavy Industrial	100,000 square feet
Medical Office	20,000 square feet
General Office	39,000 square feet
Educational	9,000 square feet
Governmental	10,000 square feet
Recreational	20,000 square feet
Transportation / Transit	Construction exhaust emissions equal or exceeding 2.0 tons NOx or 2.0 tons PM <sub>10</sub>
Source: Air District, GAMAQI, Table 4, page 96, also	

### **Cumulative Increase in Emissions**

“By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development. Future attainment of State and

<sup>14</sup> Air District, GAMAQI, Section 8.4.4, Page 95

<sup>15</sup> Air District, [http://www.valleyair.org/transportation/CEQA%20Rules/GAMAQI\\_AAQA\\_05-24-2013.pdf](http://www.valleyair.org/transportation/CEQA%20Rules/GAMAQI_AAQA_05-24-2013.pdf); accessed September 2021.

Federal ambient air quality standards is a function of successful implementation of the District’s attainment plans. Consequently, the District’s application of thresholds of significance for criteria pollutants is relevant to the determination of whether a project’s individual emissions would have a cumulatively significant impact on air quality. A Lead Agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program, including, but not limited to an air quality attainment or maintenance plan that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located [CCR §15064(h)(3)]. Thus, if project specific emissions exceed the thresholds of significance for criteria pollutants the project would be expected to result in a cumulatively considerable net increase of any criteria pollutant for which the District is in non-attainment under applicable Federal or State ambient air quality standards. This does not imply that if the project is below all such significance thresholds, it cannot be cumulatively significant.”<sup>16</sup>

**Table 7** provides the San Joaquin Valley Air Basin attainment status for federal and state ambient air quality standards.

<b>Table 7. San Joaquin Valley Attainment Status</b>		
<b>Pollutant</b>	<b>Designation</b>	
	<b>Federal Standards</b>	<b>State Standards</b>
Ozone—1-hour	No Federal Standard	Nonattainment/Severe
Ozone—8-hour	Nonattainment/Extreme	Nonattainment
PM <sub>10</sub>	Attainment	Nonattainment
PM <sub>2.5</sub>	Nonattainment	Nonattainment
Carbon monoxide	Attainment/Unclassified	Attainment/Unclassified
Nitrogen dioxide	Attainment/Unclassified	Attainment
Sulfur dioxide	Attainment/Unclassified	Attainment
Lead (Particulate)	No Designation/Classification	Attainment
Hydrogen sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility-reducing particles	No Federal Standard	Unclassified
Vinyl chloride	No Federal Standard	Attainment

Source: Air District, <http://www.valleyair.org/aqinfo/attainment.htm>, accessed September 2021.

<sup>16</sup> Air District, GAMAQI, Section 7.14, Pages 65-66

## **Exposure Risks**

The location of a project is a major factor in determining whether the project will result in localized air quality impacts. The potential for adverse air quality impacts increases as the distance between the source of emissions and receptors decreases. From a health risk perspective, there are two (2) categories of projects that have the potential to cause long-term health risks impacts:

- Type A Projects: Land use projects that will place new toxic sources in the vicinity of existing receptors. This category includes sources of toxic emissions such as gasoline dispensing facilities, asphalt batch plants, warehouse distribution centers, freeways and high traffic roads, and other stationary sources that emit toxic substances.
- Type B Projects: Land use projects that will place new receptors in the vicinity of existing toxic sources. This category includes residential, commercial, and institutional developments proposed in the vicinity of existing sources such as stationary sources, freeways and high traffic roads, rail yards, and warehouse distribution centers.<sup>17</sup>

“Various tools already exist to perform a screening analysis from stationary sources impacting receptors (Type A projects) as developed for the AB2588 Hot Spots and air district permitting programs. Screening tools may include prioritization charts, AERSCREEN and various spreadsheets. For projects being impacted by existing sources (Type B projects), one screening tool is contained in the ARB Handbook: *Air Quality and Land Use Handbook: A Community Health Perspective*. The document includes a table entitled “*Recommendations on Siting New Sensitive Land Uses Such As Residences, Schools, Daycare Centers, Playgrounds, or Medical Facilities*” with recommended buffer distances associated with various types of common sources. If a proposed project is located within an established buffer distance to any of the listed sources, a health risk screening and/or assessment should be performed to assess risk to potential sensitive receptors. These guidelines are intended only for projects that are impacted by a single source. Another useful tool is the CAPCOA Guidance Document: *Health Risk Assessments for Proposed Land Use Projects*. CAPCOA prepared the guidance to assist Lead Agencies in complying with CEQA requirements. The guidance document describes when and how a health risk assessment should be prepared and what to do with the results.”<sup>18</sup>

**Table 8** presents the Air District’s and ARB’s siting recommendations for projects proposing sensitive land uses.

---

<sup>17</sup> Air District, GAMAQI, Section 6.5, Page 44

<sup>18</sup> Air District, GAMAQI, Section 6.5, Page 45

<b>Table 8. ARB Recommendations on Siting New Sensitive Land Uses</b>	
<b>Source Category</b>	<b>Advisory Recommendations</b>
Freeways and High-Traffic Roads	Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.
Distribution Centers	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week).  Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.
Rail Yards	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within one mile of a rail yard, consider possible siting limitations and mitigation approaches.
Ports	Avoid siting of new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.
Refineries	Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult with local air districts and other local agencies to determine an appropriate separation.
Chrome Platers	Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.
Dry Cleaners Using Perchloroethylene	Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines, provide 500 feet. For operations with 3 or more machines, consult with the local air district.  Do not site new sensitive land uses in the same building with perchloroethylene dry cleaning operations.
Gasoline Dispensing Facilities	Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50 foot separation is recommended for typical gas dispensing facilities.
Sources: Air Resources Board, <i>Air Quality and Land Use Handbook: A Community Health Perspective</i> , Page 4, Table 1-1, <a href="https://www.arb.ca.gov/ch/handbook.pdf">https://www.arb.ca.gov/ch/handbook.pdf</a> , accessed September 2021 California Air Pollution Control Officers Association, <i>Health Risk Assessments for Proposes Land Use Projects</i> , Page 9, Table 2, <a href="http://www.valleyair.org/transportation/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf">http://www.valleyair.org/transportation/CAPCOA_HRA_LU_Guidelines_8-6-09.pdf</a> , accessed September 2021.	

“Determination of whether project emissions would expose sensitive receptors to substantial pollutant concentrations is a function of assessing potential health risks. Sensitive receptors are facilities that house or attract children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Hospitals, schools, convalescent facilities, and residential areas are examples of sensitive receptors. When evaluating whether a development proposal has the potential to result in localized impacts, Lead Agency staff need to consider the nature of the air pollutant emissions, the proximity between the emitting facility and sensitive receptors, the direction of prevailing winds, and local topography. Lead Agencies are encouraged to use the screening tools for Toxic Air Contaminant presented in section 6.5 (Potential Land Use Conflicts and Exposure of Sensitive Receptors [pages 44 – 45 of the GAMAQI]) to identify

potential conflicts between land use and sensitive receptors and include the result of their analysis in the referral document.”<sup>19</sup>

### **Nuisance Odors**

“Due to the subjective nature of odor impacts, the number of variables that can influence the potential for an odor impact, and the variety of odor sources, there are no quantitative or formulaic methodologies to determine the presence of a significant odor impact. Rather, the District recommends that odor analyses strive to fully disclose all pertinent information. The intensity of an odor source’s operations and its proximity to sensitive receptors influences the potential significance of odor emissions. The District has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley. These are presented in Chapter 8 [of the GAMAQI] along with a reasonable distance from the source within which, the degree of odors could possibly be significant.”<sup>20</sup>

Two situations create a potential for odor impact. The first occurs when a new odor source is located near an existing receptor. The second occurs when a new receptor locates near an existing source of odor. “An analysis of potential odor impacts should be conducted for the following two situations:

1. Generators – projects that would potentially generate odorous emissions proposed to locate near existing sensitive receptors or other land uses where people may congregate, and
2. Receivers – residential or other sensitive receptor projects or other projects built for the intent of attracting people locating near existing odor sources.”<sup>21</sup>

“The intensity of an odor source’s operations and its proximity to sensitive receptors influences the potential significance of odor emissions. The District has identified some common types of facilities that have been known to produce odors in the San Joaquin Valley Air Basin. These are presented in Table 6 (Screening Levels For Potential Odor Sources) [of the GAMAQI] along with a reasonable distance from the source within which, the degree of odors could possibly be significant. Table 6 (Screening Levels for Potential Odor Sources) [of the GAMAQI], can be used as a screening tool to qualitatively assess a project’s potential to adversely affect area receptors. This list of facilities is not all-inclusive. The Lead Agency should evaluate facilities not included in the table or projects separated by greater distances if warranted by local conditions or special circumstances. If the proposed project would result in sensitive receptors being located closer than the screening level distances, a more detailed analysis should be provided.”<sup>22</sup>

**Table 9** presents the Air District’s screening levels for potential nuisance odor sources.

---

<sup>19</sup> Air District, GAMAQI, Section 7.15, Page 66

<sup>20</sup> Air District, GAMAQI, Section 7.16, Pages 66-67

<sup>21</sup> Air District, GAMAQI, Section 8.6, Page 102

<sup>22</sup> Air District, GAMAQI, Section 8.6, Pages 102-103

<b>Table 9. Air District Screening Levels for Potential Odor Sources</b>	
<b>Odor Generator / Type of Facility</b>	<b>Distance</b>
Wastewater Treatment Facilities	2 miles
Sanitary Landfill	1 mile
Transfer Station	1 mile
Composting Facility	1 mile
Petroleum Refinery	2 miles
Asphalt Batch Plant	1 mile
Chemical Manufacturing	1 mile
Fiberglass Manufacturing	1 mile
Painting/Coating Operations (e.g., auto body shop)	1 mile
Food Processing Facility	1 mile
Feed Lot/Dairy	1 mile
Rendering Plant	1 mile
Sources: Air District, GAMAQI, Table 6, page 103; and <a href="http://www.valleyair.org/transportation/GAMAQI-2015/GAMAQI-Criteria-Pollutant-Thresholds-of-Odors.pdf">http://www.valleyair.org/transportation/GAMAQI-2015/GAMAQI-Criteria-Pollutant-Thresholds-of-Odors.pdf</a> .	

### **2017 Climate Change Scoping Plan**

The California State Legislature adopted Assembly Bill 32 (AB 32) on September 27, 2006. AB 32 focuses on reducing GHG emissions to 1990 levels by the year 2020 and to 80% below 1990 levels by the year 2050. Pursuant to the requirements in AB 32, the ARB adopted the Climate Change Scoping Plan (2008 Scoping Plan), which outlines actions recommended to obtain that goal.<sup>23</sup> Subsequently, the Legislature adopted Senate Bill 32 (SB 32) on September 8, 2016. SB 32 focuses on reducing GHG emissions to 40% below 1990 levels by the year 2030. Pursuant to the requirements in SB 32, the ARB adopted the Climate Change Scoping Plan Update (2017 Scoping Plan), which outlines actions recommended to obtain that goal. ARB recommends statewide targets of no more than six (6) metric tons CO<sub>2e</sub> per capita by 2030 and no more than two (2) metric tons CO<sub>2e</sub> per capita by 2050.<sup>24</sup>

### **Air District Guidance**

“On December 17, 2009, the District’s Governing Board adopted the District Policy: *Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*. The District’s Governing Board also approved the guidance document: *Guidance for Valley Land-Use Agencies in Addressing GHG Emission Impacts for New Projects Under CEQA*. In support of the policy and guidance document, District staff prepared a staff report: *Addressing Greenhouse Gas Emissions Under the California Environmental Quality Act*. These documents adopted in December of 2009 continue to be the relevant policies to address GHG

<sup>23</sup> Climate Change Scoping Plan website: <http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>. Accessed September 2021.

<sup>24</sup> ARB, California’s 2017 Climate Change Scoping Plan, Page 99, [https://www.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf). Accessed September 2021.

emissions under CEQA. As these documents may be modified under a separate process, the latest versions should be referenced to determine the District’s current guidance at the time of analyzing a particular project.”<sup>25</sup>

“It is widely recognized that no single project could generate enough GHG emissions to noticeably change the global climate temperature. However, the combination of GHG emissions from past, present and future projects could contribute substantially to global climate change. Thus, project specific GHG emissions should be evaluated in terms of whether or not they would result in a cumulatively significant impact on global climate change. GHG emissions, and their associated contribution to climate change, are inherently a cumulative impact issue. Therefore, project-level impacts of GHG emissions are treated as one-in-the-same as cumulative impacts.

In summary, the staff report evaluates different approaches for assessing significance of GHG emission impacts. As presented in the report, District staff reviewed the relevant scientific information and concluded that the existing science is inadequate to support quantification of the extent to which project specific GHG emissions would impact global climate features such as average air temperature, average rainfall, or average annual snow pack. In other words, the District was not able to determine a specific quantitative level of GHG emissions increase, above which a project would have a significant impact on the environment, and below which would have an insignificant impact. This is readily understood, when one considers that global climate change is the result of the sum total of GHG emissions, both manmade and natural that occurred in the past; that is occurring now; and will occur in the future.

In the absence of scientific evidence supporting establishment of a numerical threshold, the District policy applies performance based standards to assess project-specific GHG emission impacts on global climate change. The determination is founded on the principal that projects whose emissions have been reduced or mitigated consistent with the California Global Warming Solutions Act of 2006, commonly referred to as “AB 32”, should be considered to have a less than significant impact on global climate change. For a detailed discussion of the District’s establishment of thresholds of significance for GHG emissions, and the District’s application of said thresholds, the reader is referred to the above referenced staff report, District Policy, and District Guidance documents.”<sup>26</sup>

“As presented in Figure 6 (Process of Determining Significance of Greenhouse Gas Emissions) [of the GAMAQI], the policy provides for a tiered approach in assessing significance of project specific GHG emission increases.

- Projects complying with an approved GHG emission reduction plan or GHG mitigation program which avoids or substantially reduces GHG emissions within the geographic area in which the project is located would be determined to have a less than significant individual and cumulative impact for GHG emissions. Such plans or programs must be specified in law or approved by the Lead Agency with jurisdiction over the affected resource and supported by a CEQA compliant environmental review document adopted by the Lead Agency. Projects complying with an approved GHG emission reduction plan

---

<sup>25</sup> Air District, GAMAQI, Section 8.9, Page 110

<sup>26</sup> Air District, GAMAQI, Section 8.9.1, Pages 111-112

or GHG mitigation program would not be required to implement Best Performance Standards (BPS).

- Projects implementing BPS would not require quantification of project specific GHG emissions. Consistent with CEQA Guideline, such projects would be determined to have a less than significant individual and cumulative impact for GHG emissions.
- Projects not implementing BPS would require quantification of project specific GHG emissions and demonstration that project specific GHG emissions would be reduced or mitigated by at least 29%, compared to Business as Usual (BAU), including GHG emission reductions achieved since the 2002-2004 baseline period, consistent with GHG emission reduction targets established in ARB's AB 32 Scoping Plan. Projects achieving at least a 29% GHG emission reduction compared to BAU would be determined to have a less than significant individual and cumulative impact for GHG.

The District guidance for development projects also relies on the use of BPS. For development projects, BPS includes project design elements, land use decisions, and technologies that reduce GHG emissions. Projects implementing any combination of BPS, and/or demonstrating a total 29 percent reduction in GHG emissions from business-as-usual (BAU), would be determined to have a less than cumulatively significant impact on global climate change.”<sup>27</sup>

The Air District's *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Project under CEQA* states, “Projects implementing Best Performance Standards in accordance with this guidance would be determined to have a less than significant individual and cumulative impact on global climate change and would not require project specific quantification of GHG emissions. Projects exempt from the requirements of CEQA, and projects complying with an approved GHG emission reduction plan or mitigation program would also be determined to have a less than significant individual or cumulative impact. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources and have a certified final CEQA document. Projects not implementing BPS would require quantification of project specific GHG emissions. To be determined to have a less than significant individual and cumulative impact on global climate changes, such projects must be determined to have reduced or mitigated GHG emissions by 29%, consistent with GHG emission reduction targets established in ARB's AB 32 Scoping Plan. Furthermore, quantification of GHG emissions would be expected for all projects for which the lead agency has determined that an Environmental Impact Report is required, regardless of whether the project incorporates Best Performance Standards.”<sup>28</sup>

“If total GHG emissions reductions measures add up to 29% or more, are enforceable, and are required as a part of the development's approval process, the project achieves the Best Performance Standard (BPS) for the respective type of development project. Thus, the GHG emissions from the development project would be determined to have a less than individually and cumulatively significant impact on global climate change for CEQA purposes.”<sup>29</sup>

---

<sup>27</sup> Air District, GAMAQI, Section 8.9.1, Page 112

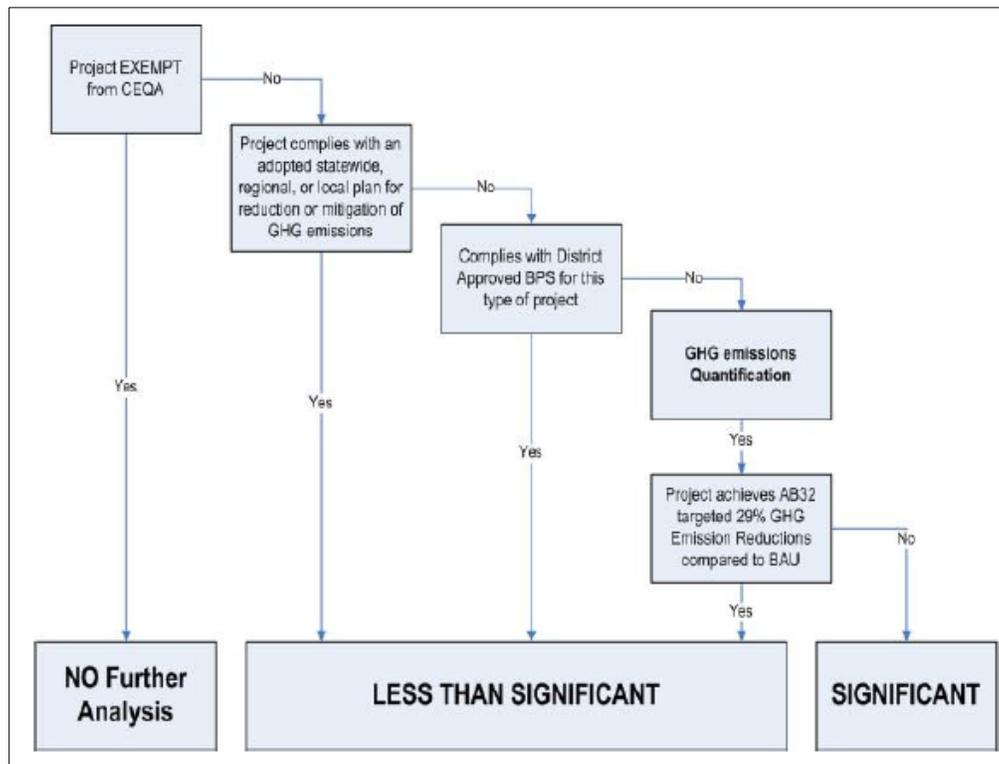
<sup>28</sup> Air District, GHG Guidance, Page 4

<sup>29</sup> Air District, GHG Guidance, Pages 7-8

“By definition, BPS for development projects is achieving a project-by-project 29% reduction in GHG emissions, compared to BAU. Thus, it is reasonable to conclude that Lead Agencies implementing the proposed *Guidance for Valley Land-use Agencies in Addressing GHG Emission Impacts for New Projects under CEQA* threshold will achieve an overall reduction in GHG emissions consistent with AB 32 emission reduction targets...”<sup>30</sup>

**Figure 1** provides a visual summary of the Air District’s process for determining significance of project-related GHG emissions.

**Figure 1. Process of Determining Significance of Greenhouse Gas Emissions**



Source: Air District, GAMAQI, Figure 6, Page 113

The Air District’s guidance document was adopted to provide a basis for lead agencies to establish significance thresholds consistent with ARB’s 2008 Scoping Plan. The Air District currently does not have a recommendation for establishing thresholds or assessing significance consistent with the reduction requirements established in ARB’s 2017 Scoping Plan Update, which requires a 33.2% reduction from BAU to achieve the 2030 target. As such, Tulare County prepared and adopted the Tulare County 2018 Climate Action Plan (CAP) Update.

“The CAP serves as a guiding document for County of Tulare (“County”) actions to reduce greenhouse gas emissions and adapt to the potential effects of climate change. The CAP is an implementation measure of the 2030 General Plan Update. The General Plan provides the supporting framework for development in the County to produce fewer greenhouse gas emissions during Plan buildout. The CAP builds on the General Plan’s framework with more

<sup>30</sup> Air District, GHG Guidance, Page 8

specific actions that will be applied to achieve emission reduction targets consistent with California legislation.”<sup>31</sup>

“The County of Tulare (County) adopted the Tulare County Climate Action Plan (CAP) in August 2012. The CAP includes provisions for an update when the State of California Air Resources Board (CARB) adopts a Scoping Plan Update that provides post-2020 targets for the State and an updated strategy for achieving a 2030 target. Governor Brown signed Senate Bill (SB) 32 on September 8, 2016 which contains the new 2030 target. The CARB 2017 Scoping Plan Update for the Senate Bill (SB) 32 2030 targets was adopted by the CARB on December 14, 2017 which provided new emission inventories and a comprehensive strategy for achieving the 2030 target (CARB 2017a). With the adoption of the 2017 Scoping Plan, the County proceeded with the 2018 CAP Update that is provided in this document.

The 2018 CAP Update incorporates new baseline and future year inventories to reflect the latest information and updates the County’s strategy to address the SB 32 2030 target. The 2030 target requires the State to reduce emissions by 40 percent below 1990 levels from the 2017 Scoping Plan and County data. The CAP identifies the County’s fair share of reductions required to maintain consistency with the State target.”<sup>32</sup>

## IMPACT EVALUATION

### AIR QUALITY IMPACTS

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

Project Impact Analysis:                    *Less Than Significant Impact*

Air quality plans (also known as AQPs or attainment plans) and subsequent rules are used to bring the applicable air basin into attainment with federal AAQS designed to protect the health and safety of residents within that air basin. In order to show attainment of the standards, the Air District analyzes the growth projections in the San Joaquin Valley Air Basin (SJVAB), contributing factors in the formation and emission of air pollutants, and existing and future emissions controls. The Air District then formulates an AQP which details the Air District’s control strategy to reach attainment. The Air District’s 2016 Plan for the 2008 8-Hour Ozone Standard, 2013 Plan for the Revoked 1-Hour Ozone Standard, 2007 Ozone Plan, 2007 PM<sub>10</sub> Maintenance Plan and Request for Redesignation, 2008 PM<sub>2.5</sub> Plan, 2012 PM<sub>2.5</sub> Plan, 2015 Plan for the 1997 PM<sub>2.5</sub> Standard, the 2016 Moderate Area Plan for the 2012 PM<sub>2.5</sub> Standard, and 2018 Plan for the 1997, 2006, and 2012 PM<sub>2.5</sub> Standards outline a number of control strategies to help the SJVAPCD reach attainment for the revoked federal 1-hour ozone standard, the 24-hour PM<sub>10</sub> standard, and the federal and state PM<sub>2.5</sub> standards, respectively. The PM plans (with the exception of the 2007 PM<sub>10</sub> Maintenance Plan) focus specifically on PM<sub>2.5</sub>, although the control strategies from previous PM<sub>10</sub> plans (particularly those related to fugitive dust control) have

---

<sup>31</sup> Tulare County Climate Action Plan, December 2018 Update. Page 1.  
<http://generalplan.co.tulare.ca.us/documents/GP/001Adopted%20Tulare%20County%20General%20Plan%20Materials/220Climate%20Action%20Plan/CLIMATE%20ACTION%20PLAN%202018%20UPDATE.pdf>. Accessed September 2021.

<sup>32</sup> Ibid.

already improved the SJVAB ambient PM<sub>2.5</sub> levels. Therefore, because fugitive dust controls continue to be addressed in the PM<sub>10</sub> plan, the plans contain a comprehensive list of strict regulatory and incentive-based measures to reduce directly-emitted PM<sub>2.5</sub> and precursor emissions. The SJVAB is in attainment for CO, SO<sub>2</sub>, and lead, so there are no attainment plans for those pollutants.<sup>33</sup> Future development projects within the scope of the Community Plan Update will be required to comply with all applicable Air District rules and regulations including, but not limited to, Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions) requirements and District Rule 9510 (Indirect Source Review).

As previously noted, the Air District has determined that projects with emissions below the thresholds of significance for criteria pollutants (see **Table 4**) would “Not conflict or obstruct implementation of the District’s air quality plan.”<sup>34</sup> There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan Update. However, the Plan does include updates to land use designations that could increase the buildout potential of the planning area. As such, projected growth estimates for population, housing, and non-residential land uses are based on the 1.3% annual growth rate projected for the County in the Tulare County General Plan. To assess a worst-case growth scenario, the 1.3% growth rate was applied to the existing 2017 base year population and housing data (as provided in the United States Census Bureau 2017 American Community Survey) and the existing non-residential uses within the community (assuming that all developed properties have been improved with structures at a floor-to-area ratio of 0.2) to determine the amount of development that could occur by 2030. The projected growth through 2030 is presented in **Tables 1 and 2**.

The future buildout of the Plan Update area would result in short-term, temporary, and intermittent construction-related and long-term operations-related criteria air pollutant emissions. Consistent with the Air District guidance, Project-related construction and operation emissions have been estimated using CalEEMod, Version 2016.3.2. The CalEEMod modeling results can be found in Attachment “B”. Construction phasing, off-road construction equipment and on-road employee, hauling, and vendor vehicle estimates utilized model default values. Model defaults were also utilized for operational activities, except where Project-specific information could be input (see **Table 3**).

**Table 10** provides the construction-related criteria pollutant emissions and **Table 11** provides the operations-related criteria pollutant emissions associated with the projected growth.

<b>Table 10. Annual Construction Emissions Estimates (Mitigated)</b>						
Construction Year	Estimated Emissions, tons per year					
	ROG	NOx	CO	SO <sub>2</sub>	Total PM <sub>10</sub>	Total PM <sub>2.5</sub>
Community Buildout	4.6151	6.6692	7.0378	0.0269	1.5606	0.5522
Streets/Road Maintenance	0.1012	0.5158	0.4435	0.0009	0.1023	0.0590
Construction Total	4.7163	7.1850	7.4813	0.0278	1.7829	0.6694
SJVAPCD Threshold	10	10	100	27	15	15
Threshold Exceeded	No	No	No	No	No	No
<i>Source: See Attachment “A”</i>						

<sup>33</sup> Air District air quality plans can be found online at [http://valleyair.org/Air\\_Quality\\_Plans/air-quality-plans.htm](http://valleyair.org/Air_Quality_Plans/air-quality-plans.htm).

<sup>34</sup> Air District, GAMAQI, Section 7.12, Page 65.

<b>Table 11. Annual Operational Emissions Estimates (Mitigated)</b>						
Construction Year	Estimated Emissions, tons per year					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	Total PM <sub>10</sub>	Total PM <sub>2.5</sub>
Operations at Buildout	1.18130	4.3369	7.3611	0.0271	1.9920	0.5603
SJVAPCD Threshold	10	10	100	27	15	15
Threshold Exceeded	No	No	No	No	No	No

*Source: See Attachment "A" of this document.*

As previously noted, there are no specific development projects associated with the Community Plan Update that would result in emissions exceeding Air District thresholds of significance. The Air District evaluates significance of short-term (construction) emissions independent of long-term (operational) emissions. As demonstrated in **Tables 10 and 11**, the estimated annual Project-related emissions during construction and operations will not exceed the Air District's CEQA significance thresholds for any criteria pollutant. Future by-right developments will be required to comply with local, regional, state, and federal policies designed to reduce impacts on air quality. Any future discretionary actions requiring agency approval will also be required to comply with local, regional, state, and federal policies and undergo additional CEQA review. As future developments are identified they will be evaluated at the time of submittal. The County will consult with the Air District on a project-by-project basis as new developments are proposed to evaluate potential impacts based on project-specific details and determine whether a localized pollutant analysis (such as an Ambient Air Quality Analysis or Health Risk Assessment) would be required. Future developments will comply with all applicable Air District rules and regulations including, but not limited to, Regulation VIII (Fugitive PM10 Prohibition), Rule 2201 (New and Modified Stationary Source Review), and Rule 9510 (Indirect Source Review). Furthermore, the Air District has used an average annual growth rate for Tulare County ranging from approximately 1.02% to 1.94% in the development of the air quality plans.<sup>35</sup> The 1.3% annual growth rate applied in the Cutler-Orosi Community Plan is lower than the growth rates applied in the applicable Air Quality Plans (AQPs). As such, emissions associated with anticipated growth through year 2030 would be included in the AQPs emissions inventories. Therefore, implementation of the Community Plan Update would not conflict with or obstruct implementation of the applicable AQPs. The Project will have a ***Less Than Significant Project-specific Impact*** related to this Checklist Item.

**Cumulative Impact Analysis:      *Less Than Significant Impact***

The geographic area of this cumulative analysis is the San Joaquin Air Basin. The emissions analysis demonstrates the Project will not exceed the Air District's thresholds of significance. The growth rates applied in the analysis is consistent with the applicable AQPs. As such, the Project will not conflict with or obstruct implementation of the applicable air quality plans. Furthermore, the County will consult with the Air District on a project-by-project basis, and future developments will be required to implement all applicable General Plan policies and to comply with all applicable Air District rules and regulations. Therefore, the Project will result in a ***Less Than Significant Cumulative Impact*** related to this Checklist Item.

**Mitigation Measures:                      *None Required***

<sup>35</sup> Air District air quality plans can be found online at [http://valleyair.org/Air\\_Quality\\_Plans/air-quality-plans.htm](http://valleyair.org/Air_Quality_Plans/air-quality-plans.htm)

Conclusion: ***Less Than Significant Impact***

As previously noted, the Project will not exceed the Air District's thresholds of significance and the growth rates applied in the analysis is consistent with the applicable AQPs. As such, implementation of the Community Plan Update will not conflict with or obstruct implementation of the applicable air quality plans. Therefore, ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item will occur.

**b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?**

Project Impact Analysis: ***Less Than Significant Impact***

As previously noted, there are no development projects proposed with the Community Plan Update. The Plan is intended only to guide future developments in a manner that will minimize or avoid potential adverse impacts of urban growth. The Plan contains multiple policies that support the County's efforts in providing sustainable communities and reducing vehicle miles traveled (VMT), which has the co-benefit of reducing certain criteria pollutants. The Plan also contains policies that encourage interagency coordination in the evaluation of project-specific impacts on air quality and implementation of air quality rules and regulations.

The Project would be considered to have a significant cumulative impact on air quality if project-specific impacts are determined to be significant. As previously noted, the emissions analysis confirms that Project-specific emissions are below the Air District's thresholds of significance at a project-specific level, and that the Project will not cause or contribute to an existing air quality violation. Furthermore, the County will consult with the Air District on a project-by-project basis to ensure that future developments are implemented consistent with Air District rules and regulations, including but not limited to, Regulation VIII (Fugitive PM10 Prohibition), Rule 2201 (New and Modified Stationary Source Review), and Rule 9510 (Indirect Source Review). The Project will be required to implement all applicable General Plan policies and to comply with all applicable Air District rules and regulations. Therefore, because the Project would have ***Less Than Significant Project-specific Impacts***, the Project will have a ***Less Than Significant Cumulative Impact*** on air quality.

Cumulative Impact Analysis: ***Less Than Significant Impact***

The Project would be considered to have a significant cumulative impact on air quality if project-specific impacts are determined to be significant. Because project-specific impacts are less than significant, the Project will have a ***Less Than Significant Cumulative Impact*** on air quality.

Mitigation Measures: ***None Required***

Conclusion: ***Less Than Significant Impact***

As previously noted, Project-related criteria pollutant emissions fall below the Air District's significance thresholds and the Project will be required to implement all applicable General Plan policies and to comply with all applicable Air District rules and regulations. Therefore, the Project will have a *Less Than Significant Cumulative Impact* related to this Checklist Item.

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

Project Impact Analysis: *Less Than Significant Impact*

Sensitive receptors are those individuals who are sensitive to air pollution and include children, the elderly, and persons with pre-existing respiratory or cardiovascular illness. The Air District considers a sensitive receptor to be a location that houses or attracts children, the elderly, people with illnesses, or others who are especially sensitive to the effects of air pollutants. Examples of sensitive receptors include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units.<sup>36</sup>

**Construction-Related Emissions**

**Construction Equipment TACs/HAPs:** Particulate emissions from diesel powered construction equipment are considered a TAC by the California Air Resources Board. There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan Update. However, future development projects have the potential to temporarily expose receptors to increased pollutant emission concentrations from diesel powered construction equipment during the short-term construction phase. However, construction emissions are temporary and would cease upon completion of construction activities. The short-term nature of construction-related emissions would not expose nearby receptors to substantial TAC concentrations. *Less Than Significant Project-specific Impacts* related to this Checklist Item will occur.

**Dust-borne TACs/HAPs:** There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan. However, future development projects have the potential to temporarily expose nearby receptors to fugitive particulate (dust) emissions during the short-term construction phase or from landscaping activities once the development project is operational. As of September 2021, there was one State Response listing within the Project planning area in the California Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Site List.<sup>37</sup> This site is not included on the National Priorities List. A query performed on the DTSC *Envirostor* indicated that there are no other state response, superfund, voluntary cleanup, school cleanup or corrective actions within the proposed UDB and one (1) hazardous waste site approximately two (2) miles

---

<sup>36</sup> Air District, GAMAQI. Glossary, Page 10

<sup>37</sup> DTSC. Hazardous Waste and Substance Site List.

[https://www.envirostor.dtsc.ca.gov/public/search.asp?page=8&cmd=search&business\\_name=&main\\_street\\_name=&city=&zip=&county=&status=ACT%2CBKLG%2CCOM&branch=&site\\_type=CSITES%2COPEN%2CFUDS%2CCLOSE&npl=&funding=&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST&reporttype=CORTESE&federal\\_superfund=&state\\_response=&voluntary\\_cleanup=&school\\_cleanup=&operating=&post\\_closure=&non\\_operating=&corrective\\_action=&tiered\\_permit=&evaluation=&spec\\_prog=&national\\_priority\\_list=&senate=&congress=&assembly=&critical\\_pol=&business\\_type=&case\\_type=&searchtype=&hwmp\\_site\\_type=&cleanup\\_type=&ocierp=&hwmp=False&permitted=&pc\\_permitted=&inspections=&complaints=&censustract=&cesdecile=&school\\_district=&orderby=county](https://www.envirostor.dtsc.ca.gov/public/search.asp?page=8&cmd=search&business_name=&main_street_name=&city=&zip=&county=&status=ACT%2CBKLG%2CCOM&branch=&site_type=CSITES%2COPEN%2CFUDS%2CCLOSE&npl=&funding=&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST&reporttype=CORTESE&federal_superfund=&state_response=&voluntary_cleanup=&school_cleanup=&operating=&post_closure=&non_operating=&corrective_action=&tiered_permit=&evaluation=&spec_prog=&national_priority_list=&senate=&congress=&assembly=&critical_pol=&business_type=&case_type=&searchtype=&hwmp_site_type=&cleanup_type=&ocierp=&hwmp=False&permitted=&pc_permitted=&inspections=&complaints=&censustract=&cesdecile=&school_district=&orderby=county)  
Accessed September 2021.

west of the Project planning area.<sup>38</sup> A query of the State Water Resources Control Board (WRCB) *GeoTracker* Site and Facilities mapping programs revealed 14 leaking underground storage tank (LUST) sites within the Project planning area, 12 of which are designated as having cleanup being completed and case closed, and one (1) active Cleanup Site.<sup>39</sup> A query performed on the U.S. Environmental Protection Agency (EPA) *Superfund Enterprise Management System* (SEMS) website listed two polluted sites within the Project planning area.<sup>40</sup> Cleanup sites must comply with federal, state, and Air District requirements for soil remediation and generation of dust. As such, fugitive dust emissions from earthmoving activities on these sites would not expose future residents or nearby receptors to substantial pollutant concentrations. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan. However, future development projects have the potential to temporarily expose nearby residences to other airborne hazards from generation of fugitive dust emissions during construction-related earthmoving activities. Although not specifically required by CEQA, the following discussions related to valley fever and asbestos are included to satisfy requirements for full disclosure of potential Project-related impacts and are for information purposes only.

***Valley Fever:*** Valley fever, or coccidioidomycosis, is an infection caused by inhalation of the spores of the fungus, *Coccidioides immitis* (*C. immitis*). According to the Centers for Disease Control (CDC), the San Joaquin Valley is considered an endemic area for valley fever.<sup>41</sup> “The fungus is known to live in the soil in the southwestern United States and parts of Mexico and Central and South America. The fungus was also recently found in south-central Washington. People can get Valley fever by breathing in the microscopic fungal spores from the air in these areas. Most people who breathe in the spores don’t get sick, but some people do. Usually, people who get sick with Valley fever will get better on their own within weeks to months, but some people will need antifungal medication. Certain groups of people are at higher risk for developing the severe forms of the infection, and these people typically need antifungal treatment. It’s difficult to prevent exposure to *Coccidioides* in areas where it’s common in the environment, but people who are at higher risk for severe Valley fever should try to avoid breathing in large amounts of dust if they’re in these areas.”<sup>42</sup>

Construction-related activities generate fugitive dust that could potentially contain *C. immitis* spores. The future development projects will be required to implement General Plan Policy AQ-4.2 (Dust Suppression Measures), which was specifically designed to address impacts from the generation of dust emitted into the air. Future development project will also be required to comply with Air District Regulation VIII (Fugitive PM10 Prohibitions) requirements, including submittal of construction notification and/or dust control plan(s), which minimize the generation of fugitive dust during construction-related activities. Therefore, implementation of General Plan policies and compliance with Air District rules and regulations would reduce the chance of

---

<sup>38</sup> DTSC. Envirostor. Sites and Facilities mapping website. <https://www.envirostor.dtsc.ca.gov/public/map/>, Accessed September 2021.

<sup>39</sup> WRCB, GeoTracker, Sites and Facilities mapping website. <https://geotracker.waterboards.ca.gov/>, Accessed September 2021.

<sup>40</sup> EPA, SEMS Search, <https://www.epa.gov/enviro/sems-search>, accessed September 2021.

<sup>41</sup> CDC, <https://www.cdc.gov/fungal/diseases/coccidioidomycosis/maps.html>, accessed September 2021.

<sup>42</sup> CDC, <https://www.cdc.gov/fungal/diseases/coccidioidomycosis/definition.html>, accessed September 2021.

exposure to valley fever during construction-related activities. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

***Naturally Occurring Asbestos:*** In areas containing naturally occurring asbestos, earthmoving construction-related activities, such as grading and trenching, could expose receptors to windblown asbestos. According to a United States Geological Soil Survey map of areas where naturally occurring asbestos in California are likely to occur, the Project is not located in an area known to contain naturally occurring asbestos.<sup>43</sup> The Project planning area and the immediate vicinity has been previously disturbed by agricultural operations and by rural residential and commercial/retail development. Future development projects will be required to implement General Plan Policy AQ-4.2 (Dust Suppression Measures) to comply with Air District Regulation VIII (Fugitive PM10 Prohibitions) requirements, thereby reducing the chance of exposure to valley fever during construction-related activities. Therefore, ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

### **Operations-Related Emissions**

***Operations from Future Development:*** There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan Update that would be a source of TAC or HAP emissions. However, operation-related activities associated with future development projects may require the transport and use of hazardous materials. Consumer products and gasoline are regulated by the State and use of these products would not pose a significant risk to residents or nearby receptors. Medium- and Heavy-duty diesel trucks would be a source of diesel particulate matter, which is considered to be a TAC. The County will work with the Air District on a project-by-project basis to determine whether health risk assessments would be required for projects generating diesel truck trips travelling through the Project planning area, and for other equipment that may require Air District permits. Furthermore, future applicants will be required to comply with all local, state, and federal policies related to emission of TACs/HAPs in the event such pollutants require control efforts to minimize their impacts. Tulare County Environmental Health Division will require a Hazardous Waste Business Plan if materials exceed 55 gallons (liquids), 500 pounds (solids), or 200 cubic feet (compressed gas) handled or stored on site.<sup>44</sup> As such, the Project will not expose sensitive receptors to substantial pollutant concentrations. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

***Existing Sources:*** There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan that would be a source of TAC or HAP emissions, and the location of future development projects in close proximity to sensitive receptors cannot be determined until future projects are identified. To ensure that future development within the Project planning area does not expose sensitive receptors to significant impacts from TAC emissions, the County will review individual projects on a project-by-project basis to determine if ARB's Air Quality Land Use Handbook screening criteria presented in

---

<sup>43</sup> USGS, *Reported Historic Asbestos Mines, Historic Asbestos Prospects, and Other Natural Occurrences of Asbestos in California*, <http://pubs.usgs.gov/of/2011/1188/>, accessed September 2021.

<sup>44</sup> Tulare County Health and Human Services Agency, Environmental Health Division. Hazardous Material Business Plan. <https://tularecountyeh.org/eh/index.cfm/our-services/hazardous-materials-cupa/hazardous-materials-business-plan-hmbp/> and <https://tularecountyeh.org/eh/index.cfm/guidance-library/hazmat-cupa/hazardous-materials-business-plan-hmbp/business-plan-faqs/>. Accessed September 2021.

**Table 8** are exceeded. Projects that exceed the screening criteria will be subject to analysis using screening models or may require dispersion modeling and a health risk assessment. Tulare County will also consult with the Air District during the CEQA process for guidance on the appropriate screening tools and modeling protocols for future development projects within the Plan area. Therefore, existing sources of TAC/HAP emissions would not expose receptors to substantial pollutant concentrations. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

***Existing Agricultural Operations:*** The Project planning area is located in a rural area with urban built up land as well as active agricultural operations. Agricultural operations typically include the use of chemicals on crops for activities such as pest control, damage control, weed abatement, etc. However, these chemicals are regulated by the State and would not pose a significant risk to the existing and future residents within the Project planning area. Furthermore, the Tulare County General Plan includes Policy AG-1.14 Right-to-Farm Noticing which requires new property owners to acknowledge and accept the inconveniences associated with normal farming activities. Future development projects adjacent to agricultural lands will be required to sign a “Right to Farm” notice. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Cumulative Impact Analysis:      ***Less Than Significant Impact***

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. The Tulare County General Plan and the Community Plan include policies, which were specifically designed to engage responsible agencies in the CEQA process, to reduce air pollutant emissions through project design, require compliance with emission-reducing regulations, and to address potential impacts from siting incompatible uses in close proximity to each other. Applicable General Plan and Community Plan policies will be implemented for new development projects within the Project study area. The County will consult with the Air District on a project-by-project basis as new developments are proposed to evaluate project-specific impacts based on project-specific details and to determine whether a health risk assessment would be needed. Compliance with applicable Air District rules and regulations would further reduce potential impacts from exposure to TAC and HAP emissions, as well as valley fever and asbestos. As such, the development of the proposed Project would not expose the public to substantial pollutant concentrations. Therefore, a ***Less Than Significant Cumulative Impact*** related to this Checklist Item will occur.

Mitigation Measures:                      ***None Required***

Conclusion:                                      ***Less Than Significant Impact***

There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan. As such, the Project is not a source of, nor are there any known existing sources of, HAPs or TACs within the Project vicinity. Therefore, the proposed Project would not expose the public to substantial pollutant concentrations. ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item will occur.

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

Project Impact Analysis:                    ***Less Than Significant Impact***

Two situations create a potential for odor impact. The first occurs when a new odor source is located near an existing sensitive receptor. The second occurs when a new sensitive receptor locates near an existing source of odor. There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan Update that would be a source of nuisance odors. However, as the Community Plan is built out, dependent upon the location and nature of operations, potential exists for odor impacts to occur resulting from existing and/or new agricultural, commercial, and industrial land uses.

Potential odor sources associated with construction-related activities could originate from diesel exhaust from construction equipment and fumes from architectural coating and paving operations. However, construction-related odors, if perceptible, would dissipate as they mix with the surrounding air and would be of very limited duration. As such, objectionable odors during construction would not affect a substantial number of people.

As presented in **Table 9**, the Air District has determined the common land use types that are known to produce odors in the San Joaquin Valley Air Basin. As previously noted, there are no specific development projects associated with the Community Plan. However, the existing agricultural uses in the vicinity of the community could be a source of nuisance odors. All projects, with the exception of agricultural operations, are subject to Air District Rule 4102 (Nuisance). Therefore, odors from agriculture-related operations would not be subject to complaint reporting. There is potential for these agricultural operations to generate objectionable odors; however, these odors would be temporary or seasonal. Furthermore, the Tulare County General Plan includes Policy AG-1.14 Right-to-Farm Noticing which requires new property owners to acknowledge and accept the inconveniences associated with normal farming activities. If future developments are proposed adjacent to active agricultural uses, future residents will be required to sign a “Right to Farm” notice. To ensure potential nuisance odor impacts are addressed, if proposed developments were to result in sensitive receptors being located closer than the recommended distances to any odor generator identified in **Table 9**, a more detailed analysis, is recommended. The detailed analysis would involve contacting the Air District’s Compliance Division for information regarding odor complaints. Implementation of the applicable General Plan policies and compliance with applicable Air District rules and regulations specifically designed to address air quality and odor impacts, would reduce potential odor impacts. Therefore, the Project would not create or expose existing residents to objectionable odors. ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Cumulative Impact Analysis:                    ***Less Than Significant Impact***

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. As there are no development projects proposed with the Project, the Project does not include any new sources of odors. Future developments will be subject to Air District Rule 4102 (Nuisance) and General Plan Policy AG-1.14 Right-to-Farm Noticing will be implemented. As such, the Project will not

expose a substantial number of people to objectionable odors. Therefore, ***Less Than Significant Cumulate Impacts*** related to this Checklist Item will occur.

Mitigation Measures: ***None Required***

Conclusion: ***Less Than Significant Impact***

The Project is not a source of nuisance odors, nor are there existing sources of permanent odors in the Project vicinity that would affect future residents. As such, the Project will not expose a substantial number of people to objectionable odors. Therefore, ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item will occur.

### **GREENHOUSE GAS IMPACTS**

**a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Project Impact Analysis: ***Less Than Significant Impact***

The Air District has determined that projects consistent with an adopted Climate Action Plan (CAP) would be considered to have a less than significant impact on the environment. The Tulare County CAP was initially adopted in August 2012 and serves as a guiding document for County actions to reduce GHG emissions and adapt to the potential effects of climate change.<sup>45</sup> The CAP is an implementation measure of the Tulare County General Plan which provides the supporting framework for development in the County. The CAP builds on the General Plan's framework with more specific actions that will be applied to achieve emission reduction targets required by State of California legislation. The General Plan fulfills many sustainability and GHG reduction objectives at the program level. The CAP identifies the policies from the various General Plan elements that promote more efficient development and reduce travel and energy consumption. The CAP requires projects achieve reductions in excess of the reduction identified in the Scoping Plan. The CAP identifies General Plan policies in place to assist the County in reducing GHG emissions. "The 2018 CAP Update incorporates new baseline and future year inventories to reflect the latest information and updates the County's strategy to address the SB 32 2030 target. The CAP identifies the County's fair share of reductions required to maintain consistency with the State's target."<sup>46</sup>

The CAP thresholds for determining project consistency with the CAP are 500 dwelling units, 100,000 square feet of retail, or equivalent intensity for other uses. These thresholds are the amounts currently required from development related sources within the County to demonstrate consistency with SB 32 2030 targets. Projects exceeding the consistency thresholds must comply with the requirements of the CAP, which requires a GHG analysis report demonstrating emission reductions of at least 31% below 2015 levels by 2030 or a 9% reduction from 2030 BAU

---

<sup>45</sup> Tulare County. Climate Action Plan. August 2012. Accessed September 2021 at: [http://generalplan.co.tulare.ca.us/documents/GP/002Board%20of%20Supervisors%20Materials/004Resolution%20No.%202012-0698%20\(CAP\)/Tulare%20County%20CAP%2008-13-2012.pdf](http://generalplan.co.tulare.ca.us/documents/GP/002Board%20of%20Supervisors%20Materials/004Resolution%20No.%202012-0698%20(CAP)/Tulare%20County%20CAP%2008-13-2012.pdf).

<sup>46</sup> Tulare County. 2018 Climate Action Plan Update. December 2018. Page 1. Accessed September 2021 at <http://generalplan.co.tulare.ca.us/documents/GP/001Adopted%20Tulare%20County%20General%20Plan%20Materials/220Climate%20Action%20Plan/CLIMATE%20ACTION%20PLAN%202018%20UPDATE.pdf>.

emissions.<sup>47</sup> As the CAP implements the County’s strategy to achieve the State’s 2030 reduction targets, projects below the consistency thresholds have been determined to be consistent with the State’s targets and do not require GHG emissions quantification. Projects below the consistency thresholds would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

There are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan. As such, the proposed Project will not result in GHG emissions until specific development occurs. Future developments would be required to comply with the CAP. The CAP states, “The 2018 CAP Update includes an additional method of determining project consistency with the CAP and 2030 targets. Projects subject to CEQA review could use a checklist containing design features and measures that are needed to determine consistency. Large projects (500-unit subdivisions and 100,000 square feet of retail or equivalent intensity for other uses) and new specific plans should provide a greenhouse gas analysis report quantifying GHG emissions to demonstrate that the project emissions are at least 31 percent below 2015 levels by 2030 or 9 percent below BAU emissions in 2030. These are the amounts currently required from development related sources to demonstrate consistency with SB 32 2030 targets. Smaller projects may also prepare a GHG analysis report if the checklist is not appropriate for a particular project or is deemed necessary by the project proponent or County staff. The GHG analysis should incorporate as many measures as possible from the CalEEMod mitigation component as described in Table 15 [of the 2018 CAP] and can take credit for 2017 Scoping Plan measures that have not been incorporated into CalEEMod but that will be adopted prior to 2030 such as 50 percent RPS.”<sup>48</sup>

“The County has already approved a substantial number of lots for development. Development of some of these lots will be limited by various factors such as water supply, sewer/septic capability, road capacity, etc. that cannot be addressed during the planning horizon due to lack of resources. This means that the County expects that new development proposals will be received that are more likely to develop before existing lots are developed because the rural community, landowner, or developer has the resources to provide all improvements and services required for the site. As a rough estimate, this analysis assumes that 40 percent of the development will occur on existing lots and 60 percent will occur in new developments. Development occurring on existing lots will be subject to existing conditions of the approved subdivision and zoning standards. Development occurring in new subdivisions and projects [after 2012] would be subject to additional measures required to mitigate significant impacts. The County will encourage developers of existing lots [established prior to 2012] to implement measures that reduce greenhouse gas emissions, but it has no authority to require additional reductions beyond those required by State regulation, the building code, and local ordinance.”<sup>49</sup>

“Commercial and industrial development in Tulare County during the 2020 and 2030 planning timeframes will comply with increasingly stringent State energy efficiency regulations in most projects. For industrial projects where the SJVAPCD is a Responsible Agency, the project will be expected to implement Best Performance Standards included in the SJVAPCD Guidelines for Addressing Greenhouse Gas Emissions on the processes and stationary equipment that emit

---

<sup>47</sup> Ibid. Page73

<sup>48</sup> Op. Cit. 73

<sup>49</sup> Op. Cit. 76

greenhouse gases to levels that meet or exceed State targets and may be subject to Cap-and-Trade Program requirements.”<sup>50</sup>

There are no specific development projects (such as residential, commercial, or industrial uses) proposed with the Community Plan Update. However, as the Community Plan is implemented and the communities are built out, the future development projects would generate GHG emissions that could directly or indirectly have a significant impact of the environment. As indicated in **Table 1**, anticipated future growth based on the County’s 1.3% annual growth rate is approximately 616 residential units, 385,000 sf of commercial space, 224,000 square feet of retail space, and 268,000 sf of industrial space. Future developments within the Project study area must comply with applicable General Plan, Community Plan, and CAP policies; as such, the Community Plan update is consistent with the CAP and therefore, is considered to have a Less Than Significant impact on the environment. However, consistent with Air District guidance, Project-related emissions have been quantified using CalEEMod, Version 2016.3.2, and are summarized and provided below for informational purposes only. **Table 12** provides the construction-related GHG emissions and **Table 13** provides the operations-related GHG emissions that could occur if the buildout of the Community Plan is fully realized.

The Air District does not have a recommendation for lead agencies in assessing the significance of construction related GHG emissions. Emissions from construction would be temporary; however, to account for the long-lasting life of GHG emissions, the emissions were amortized based on the average life of all future development (30 years) and added to the operational emissions. These emissions represent a conservative estimate as the Complete Streets and Road Maintenance emissions were assessed as if they were completely new roads rather than as improvements to existing roadways.

<b>TABLE 12. CONSTRUCTION-RELATED GHG EMISSIONS (mitigated)</b>	
Emissions Source	CO <sub>2e</sub> Emissions (metric tons per year)
Community Buildout	19,636
Streets/Road Maintenance	651
<b>Total Construction Emissions</b>	<b>20,287</b>
<b>Amortized Annual Emissions</b>	<b>676</b>
<i>Note: Amortized emissions are based on an average 30-year life for all development types. Source: See Attachment “A”.</i>	

<b>TABLE 13. OPERATIONS-RELATED GHG EMISSIONS (metric tons per year)</b>			
Emissions Source	CO <sub>2e</sub> Emissions (unmitigated)	CO <sub>2e</sub> Emissions (mitigated)	% Reduction
Total Operations	27,047	25,451	5.9
Amortized Construction Emissions	676	676	0.0
<b>Total Project Emissions</b>	<b>27,723</b>	<b>26,128</b>	<b>5.8</b>
<i>Note: Amortized emissions are based on an average 30-year life for all development types. Source: See Attachment “A”.</i>			

As demonstrated in **Table 13**, the Project achieves an approximately 5.8% reduction in GHG emissions through compliance with current regulation. As future development is unknown, the

<sup>50</sup> Op. Cit. 76

analysis was performed assuming a worst-case emissions scenario, that is, that all future development would be developed in one phase beginning in 2022 and operational emissions assumed 2023 emission factors. Also, as future development is unknown, incorporation of project-specific design features in that would reduce GHG emissions and in compliance with the CAP cannot be incorporated into the emissions analysis. Therefore, the emissions reductions presented above underestimate the actual reductions that would be achieved on a project-by-project basis. As such, the Community Plan Update demonstrates continued progress towards the County achieving the 2017 Scoping Plan Update 2030 reduction requirements with an overall GHG reduction. Furthermore, the State anticipates increases in the number of zero emission vehicles operated in the State under the Advanced Clean Car Program. Compliance with SB 375 reduction targets for light duty vehicles will provide continued reductions in emissions from that source through SB 375's 2035 milestone year. The Project will provide a GHG emission reduction benefit as future buildout of the community will supply residents within the Cutler-Orosi UDB and immediate vicinity with greater shopping and employment opportunities, thereby reducing vehicle miles traveled from travelling to larger cities for such opportunities. Since future development activities requiring discretionary approvals would undergo additional CEQA review, the future developments will continue to comply with existing and future regulations, and the General Plan, Community Plan, and CAP will continue to be implemented through 2030, the growth projected for 2030 would not result in significant greenhouse gas impacts. Therefore, ***Less Than Significant Project-specific Impacts*** related to this Checklist Item will occur.

Cumulative Impact Analysis:      ***Less Than Significant Impact***

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. Project-related emissions would be considered to have a significant cumulative impact if project-specific impacts are determined to be significant. As previously noted, there are no specific development projects (such as residential, commercial, or industrial uses) associated with the Community Plan. Future developments would be required to comply with the CAP. The Project is consistent with the Tulare County CAP and as such, is consistent with the reduction targets established in the Scoping Plan. As the proposed Project would result in ***Less Than Significant Project-specific Impacts***, ***Less Than Significant Cumulative Impacts*** would also occur.

Mitigation Measures:                      ***None Required***

Conclusion:                                      ***Less Than Significant Impact***

As previously noted, the Project is consistent with the Tulare County CAP and the reduction targets established in the Scoping Plan. As such, the Project would not generate GHG emissions that would have a significant impact on the environment. ***Less Than Significant Project-specific and Cumulative Impacts*** related to this Checklist Item will occur.

**b) Would the project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Impact Analysis:                                      ***No Impact***

Since the proposed Project is located in an unincorporated area of Tulare County, the most applicable GHG plans are the Tulare County Climate Action Plan and ARB’s 2017 Climate Change Scoping Plan. As previously noted, the CAP, initially adopted in August 2012, serves as a guiding document for County actions to reduce GHG emissions and adapt to the potential effects of climate change. The CAP is an implementation measure of the Tulare County General Plan which provides the supporting framework for development in the County. The CAP builds on the General Plan’s framework with more specific actions that will be applied to achieve emission reduction targets required by State of California legislation. The General Plan fulfills many sustainability and GHG reduction objectives at the program level. The CAP identifies the policies from the various General Plan elements that promote more efficient development, and reduce travel and energy consumption. The CAP requires projects achieve reductions in excess of the reduction identified in the Scoping Plan. The CAP identifies General Plan policies in place to assist the County in reducing GHG emissions. The 2018 CAP Update incorporates new baseline and future year inventories to reflect the latest information and updates the County’s strategy to address the SB 32 2030 target. The CAP identifies the County’s fair share of reductions required to maintain consistency with the State’s target.

“The 2018 CAP Update includes an additional method of determining project consistency with the CAP and 2030 targets. Projects subject to CEQA review could use a checklist containing design features and measures that are needed to determine consistency. Large projects (500-unit subdivisions and 100,000 square feet of retail or equivalent intensity for other uses) and new specific plans should provide a greenhouse gas analysis report quantifying GHG emissions to demonstrate that the project emissions are at least 31 percent below 2015 levels by 2030 or 9 percent below BAU emissions in 2030. These are the amounts currently required from development related sources to demonstrate consistency with SB 32 2030 targets. Smaller projects may also prepare a GHG analysis report if the checklist is not appropriate for a particular project or is deemed necessary by the project proponent or County staff. The GHG analysis should incorporate as many measures as possible from the CalEEMod mitigation component as described in Table 15 and can take credit for 2017 Scoping Plan measures that have not been incorporated into CalEEMod but that will be adopted prior to 2030 such as 50 percent RPS.

Table 17 [of the 2018 CAP] lists the overarching consistency requirements for all projects based on consistency with County land use plans that apply to the project location. Reviews for consistency with land use plans require planning staff to review projects to determine if they comply with applicable plan policies and implementation measures.”<sup>51</sup>

**Table 14** presents the CEQA requirements for project consistency with the County’s CAP.

<b>TABLE 14. CEQA PROJECT REQUIREMENTS FOR CONSISTENCY WITH CAP</b>	
<b>Item</b>	<b>Required</b>
Project helps to meet the density goals from the Tulare Blueprint	Yes
Consistency with General Plan policies	Yes
Consistency with Rural Valley Lands Plan or Foothill Growth Management Plan development criteria	Yes

<sup>51</sup> .Op. Cit. 73.

Consistency with Urban Growth Boundary expansion criteria	Yes
Consistency for development within Rural Community Urban Development Boundaries (UDB) and Hamlet Development Boundaries (HDB), and Legacy Development Boundaries (LDB)	Yes
Note: Criteria as identified in the General Plan Planning Framework Source: 2018 CAP Update, Table 17, page 73	

“A more detailed review for compliance with CAP measures is required to ensure that a project is doing its part in reducing emissions. Table 18 [of the 2018 CAP] provides a checklist containing measures that will provide reductions necessary to achieve CAP consistency. A project checklist that can be used by staff is provided as Appendix C.”<sup>52</sup>

Table 15 presents the CAP consistency checklist.

TABLE 15. CAP CONSISTENCY CHECKLIST	
CAP Measure	Compliance
<b>Land Use:</b> Project is consistent with the Tulare County General Plan policies listed in the CAP applicable to GHG emissions and sustainability.	Review for compliance during project review process.
<b>Land Use—Residential:</b> Subdivisions and multifamily projects propose densities consistent with County commitments for the Tulare Blueprint. Densities in subdivisions within the boundaries of Valley rural communities must be at least 5.0 units per acre. (County R-1 zoning has a 6,000 square foot minimum lot size or 7.26 units per gross acre). Overall residential density is 5.3 units per acre for the entire County including the cities. Mountain subdivisions over 50 lots require review to determine if they are consistent with the Blueprint.	Review development plans during project review to determine if densities are consistent with Blueprint.
<b>Land Use—Non-Residential:</b> Retail and office projects should be constructed within the boundaries of Rural Communities, HDB, UDB, LDB, and in designated transportation corridors to provide needed local goods services to residents and the traveling public. Agricultural industrial projects may be constructed in rural locations as long as consistent with the General Plan.	Review development plans to ensure locations are appropriate for type of project that is proposed and consistent with County plans.
<b>Land Use Design:</b> Projects that require construction of new roads or major intersection improvements provide a fair share of improvements such as sidewalks and pedestrian friendly crossings, and bike lanes/paths connecting to schools, shopping, and other uses consistent with County development standards.	Include roadway improvements as conditions of approval of subdivision or commercial site plan
<b>Energy Efficiency:</b> Project complies with current version of Title 24. (Current version is 2016 Title 24)	Provide copy of the Title 24 Report demonstrating compliance with the applicable standards with Building Permit application.
<b>Renewable Energy:</b> Project includes solar panels or other alternative energy source meeting County Solar Ordinance or new Title 24 standards whichever is more stringent.	Include solar on building plans and provide Title 24 compliance reports with Building Permit applications.
<b>EV Charging:</b> Project meets charging installation/charging ready requirements of the CalGreen Code.	Include charging in building plans
<b>CalGreen Building Code Water:</b> Project complies with indoor and outdoor water conservation measures.	Provide copy of report showing code compliance.
<b>Water Conservation Landscaping:</b>	Project complies with County water conservation ordinance requirements for landscaping.

<sup>52</sup> Op. Cit. 73

<b>TABLE 15. CAP CONSISTENCY CHECKLIST</b>	
<b>Solid Waste:</b> Project has access to recycling service for homes and businesses meeting CalRecycle requirements.	County verify that providers are in compliance with CalRecycle regulations regarding recycling and diversion of solid waste.
<b>Large Employment Projects:</b> Projects that will have large numbers of employees (over 100) are required to comply with Rule 9410 Employee Trip Reduction Plans (ETRIP). Provide a copy of the ETRIP plan to the County after approval of the plan by the SJVAPCD.	Employer is responsible for compliance with Rule 9410
<b>Industrial Projects:</b> Industrial projects that are large employers will comply with Rule 9410. Industrial process related GHG emissions are not under the County’s regulatory authority but will require permits from the SJVAPCD and may be subject to Cap-and-Trade.	Employer is responsible for compliance with Rule 9410
Note: Criteria as identified in the General Plan Planning Framework	
Source: 2018 CAP Update, Table 18, pages 73-74	

As the County CAP requires projects to achieve reductions in excess of the reductions required in the Scoping Plan and by State legislation, projects that are consistent with the County CAP would not conflict with any applicable plan, policy or regulation adopted for reducing GHG emissions. There are no specific development projects (such as residential, commercial, or industrial uses) associated with the proposed Community Plan. Future developments will be required to comply with the requirements of the Tulare County CAP. Therefore, the Project does not conflict with the reduction strategies included in the Scoping Plan. **No Project-specific Impacts** related to this Checklist Item will occur.

Cumulative Impact Analysis:      **No Impact**

The geographic area of this cumulative analysis is the San Joaquin Valley Air Basin. The Project is consistent with the applicable Scoping Plan reductions measures and the Air District’s CCAP. The Project will implement applicable Tulare County General Plan and Tulare County CAP policies. As such, the Project will not conflict with applicable state, regional, and local plans, policies or regulation adopted for the purpose of reducing the emissions of greenhouse gases. **No Cumulative Impacts** related to this Checklist Item will occur.

Mitigation Measures:                      **None Required**

Conclusion:                                      **No Impact**

As the proposed Project is consistent with aforementioned plans, policies, and regulations, **No Project-specific and Cumulative Impacts** related to this Checklist Item would occur.