

4.2 Air Quality, Greenhouse Gases, and Climate Change

4.2.1 Methods and Significance Criteria

Methods

This section evaluates the effects on air quality, greenhouse gas (GHG) emissions, and climate change that would result from the proposed action and alternatives.

Anticipated changes in land cover/land use for each alternative are described in Chapter 2, *Proposed Action and Alternatives*. See Section 4.0, *Environmental Consequences*, for a description of the methodology used across all resource chapters for the analysis of cumulative effects.

Air quality and GHG impacts associated with the alternatives analyzed in this section would result from implementation of PCCP conservation activities, including construction, operation and maintenance (O&M), toxic air contaminant, and odor emissions resulting from equipment exhaust and fugitive dust. These potential impacts would occur on a temporary basis during construction and on a limited basis during O&M activities. Air quality and GHG impacts would also occur as a result of growth associated with the general plans of Placer County and the City of Lincoln as well as future projects of South Placer Regional Transportation Authority (SPRTA) and Placer County Water Agency (PCWA) in the Plan Area, such as transportation and water projects.

The majority of construction and O&M activities would occur within Placer County and Placer County Air Pollution Control District (PCAPCD) jurisdiction. Construction and O&M activities within Sutter County and Feather River Air Quality Management District (FRAQMD) jurisdiction consist of minor watershed protection and stream restoration activities. Impacts associated with construction and operational emissions, toxic air contaminants, and odors were evaluated on a qualitative basis.

Significance Criteria

Federal

Criteria Pollutants

The air quality Plan Area is in federally classified nonattainment and/or maintenance areas for ozone, carbon monoxide (CO), and particulate matter less than 2.5 micrometers (PM_{2.5}) (Table 3.2-6). Consequently, to fulfill general conformity requirements, a General Conformity evaluation would be required to identify whether the total ozone, CO, and PM_{2.5} emissions for the action alternatives are subject to the General Conformity rule. The General Conformity evaluation must consider both direct and indirect sources of emissions for all nonattainment and/or maintenance pollutants, which include regulated precursor emissions. Regulated precursor emissions for ozone include reactive organic gases (ROGs) and nitrogen oxides (NO_x). Regulated precursor emissions for PM_{2.5} include sulfur dioxide (SO₂), NO_x, and ROG. Therefore, the General Conformity analysis evaluates each of these direct and indirect (precursor) emissions.

The General Conformity evaluation is made by comparing all emission sources (e.g., haul trucks, off-road equipment) to the applicable General Conformity *de minimis* thresholds. It should be noted that because power plants are subject to New Source Review permitting requirements, which are exempt from the General Conformity rule, emissions associated with electricity generation are not included in the General Conformity evaluation. Table 4.2-1 summarizes the *de minimis* thresholds applicable to the proposed action, based on the region's attainment status (Table 3.2-6) and the *de minimis* threshold values presented in Tables 3.2-2 and 3.2-3. Any emissions in excess of those indicated in Table 4.2-1 would have an adverse effect on air quality.

Table 4.2-1. Federal *de minimis* Thresholds (tons per year)

Pollutant	Threshold
NO _x	100
VOC/ROG	100
CO	100
PM10	–
PM2.5	100
SO ₂	–

Greenhouse Gases

Although there is currently no federal overarching law specifically related to climate change or the reduction of GHGs, in *Coalition for Responsible Regulation, Inc., et al. v. EPA*, the U.S. Court of Appeals upheld the U.S. Environmental Protection Agency's authority to regulate GHG emissions under the Clean Air Act. In addition, federal case law has made it clear that federal agencies have the responsibility to consider the environmental issue of climate change and GHG emissions within NEPA analysis and to consider the effects of their actions on climate change through GHG emissions, as well as to analyze the effects of climate change on federal actions.

State

In accordance with Appendix G of the State CEQA Guidelines, a proposed action would be considered to have a significant effect if it would result in any of the conditions listed below.

- Conflict with or obstruct implementation of the applicable air quality plan.
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentrations.
- Create objectionable odors affecting a substantial number of people.
- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

Placer County Air Pollution Control District Thresholds

Criteria Pollutants

According to the State CEQA Guidelines, the significance criteria established by the applicable air quality management or air pollution control district may be used to make significance determinations for potential impacts on environmental resources. PCAPCD has specified significance thresholds in its *Review of Land Use Projects under CEQA Policy* (Placer County Air Pollution Control District 2016) to determine air quality effects of projects located within district boundaries. PCAPCD uses these thresholds to determine the level of significance for emissions associated with a project's construction emissions and operational emissions, shown in Tables 4.2-2 and 4.2-3, respectively. Mitigation measures are then suggested by PCAPCD to the lead agency to offset the project's related air quality impacts (Placer County Air Pollution Control District 2016).

Table 4.2-2. Placer County Air Pollution Control District Construction Project-Level Significance Thresholds (pounds/day)

Pollutant	Threshold
NO _x	82
ROG	82
PM10	82

Source: Placer County Air Pollution Control District 2016.

Table 4.2-3. Placer County Air Pollution Control District Operational Project- and Cumulative-Level Significance Thresholds (pounds/day)

Pollutant	Threshold
NO _x	55
ROG	55
PM10	82

Source: Placer County Air Pollution Control District 2016.

Greenhouse Gases

PCAPCD has specified significance thresholds in its *Review of Land Use Projects under CEQA Policy* (Placer County Air Pollution Control District 2016) to determine GHG emissions of projects located within district boundaries. PCAPCD uses these thresholds to determine the level of significance for GHG emissions associated with a project's construction emissions and operational emissions, shown in Table 4.2-4.

The *de minimis* level for the operational phase of land use projects—1,100 metric tons of carbon dioxide equivalent (MT CO₂e)/year—represents an emissions level that can be considered as less than cumulatively considerable and be excluded from further GHG impact analysis. Land use projects with operational phase GHG emissions that exceed the *de minimis* level of 1,100 MT

CO₂e/year, but fall below 10,000 MT CO₂e/year, can still be found less than cumulatively considerable if a project's operational GHG emissions are less than the appropriate efficiency level thresholds (4.5–27.3 CO₂e/capita or square feet [sf]/year) shown in Table 4.2-4. GHG emissions from the construction and operational phases of land use and stationary projects that exceed the Bright-Line Threshold of 10,000 MT CO₂e/year would be deemed to have a cumulatively considerable contribution to global climate change.

Mitigation measures are suggested by PCAPCD to the lead agency to offset the project's related GHG impacts if emissions exceed the appropriate threshold (Placer County Air Pollution Control District 2016). In accordance with the State CEQA guidelines, the analysis includes a cumulative, rather than project-level, evaluation of climate change impacts. PCAPCD encourages a project applicant to consider generating or purchasing local and California-only carbon credits as the preferred mechanism to implement offsite mitigation measures for GHG emissions and facilitate the State to achieve the GHG emission reduction goal. PCAPCD will also assist lead agencies with reviewing and verifying that the carbon credits, from either the proposed offsite mitigation projects or the purchase certification from the selected carbon credit registries, and ensure the credits are retired.

Table 4.2-4. Placer County Air Pollution Control District Adopted Greenhouse Gas Thresholds

Description	Numeric Threshold	Application
<i>De minimis</i> level for land use projects	1,100 metric tons CO ₂ e/year	Operational emissions
Efficiency levels for land use projects	4.5 metric tons CO ₂ e/capita/year	Residential urban (operational emissions)
	5.5 metric tons CO ₂ e/capita/year	Residential rural (operational emissions)
	26.5 metric tons CO ₂ e/1,000 sf/year	Non-residential Urban (operational emissions)
	27.3 metric tons CO ₂ e/1,000 sf/year	Non-residential rural (operational emissions)
Bright-line threshold for land use and stationary source projects	10,000 metric tons CO ₂ e/year	Construction and operational emissions

Source: Placer County Air Pollution Control District 2016.

Feather River Air Quality Management District Thresholds

Criteria Pollutants

For the conservation actions identified within Sutter County under the action alternatives, FRAQMD has specified significance thresholds in its *Indirect Source Review Guidelines* (Feather River Air Quality Management District 2010) to determine air quality effects of projects located within district boundaries. FRAQMD uses these thresholds to determine the level of significance for emissions associated with a project's construction emissions and operational emissions, shown in Tables 4.2-5 and 4.2-6, respectively. Mitigation measures are then suggested by FRAQMD to the lead agency to offset the project's related air quality impacts (Feather River Air Quality Management District 2010).

Table 4.2-5. Feather River Air Quality Management District Construction Project-Level Significance Thresholds (pounds/day)

Pollutant	Threshold
NO _x	25 ^a
ROG	25 ^a
PM10	80

Source: Feather River Air Quality Management District 2010.

^a NO_x and ROG construction emissions may be averaged over the life of the project, but may not exceed 4.5 tons/year.

Table 4.2-6. Feather River Air Quality Management District Operational Project-Level Significance Thresholds (pounds/day)

Pollutant	Threshold
NO _x	25
ROG	25
PM10	80

Source: Feather River Air Quality Management District 2010.

Greenhouse Gases

FRAQMD has not specified significance thresholds to determine GHG emissions of projects located within district boundaries but is working with a committee of air districts in the Sacramento Region¹ to develop guidance for evaluating GHG emissions in CEQA and NEPA documents.

Based on consultation with FRAQMD staff, use of PCAPCD GHG thresholds were used to evaluate portions of the PCCP located in Sutter County (Spaethe pers. comm.).

4.2.2 Impacts and Mitigation Measures

Alternative 1—No Action

As discussed in Chapter 2, *Proposed Action and Alternatives*, under Alternative 1, project proponents would apply for permits on a project-by-project basis, without a coordinated and comprehensive effort to minimize and mitigate biological impacts through the PCCP. Under Alternative 1, urban development and public infrastructure projects would continue to occur pursuant to the approved general plans of the applicable jurisdictions. No regional conservation strategy or conservation measures would be implemented; therefore, impacts related to air quality and GHG emissions that are associated with the conservation strategy and conservation measures would not occur. As described in Section 4.0, *Environmental Consequences*, Alternative 1 includes reasonably foreseeable activities in the Plan Area associated with urbanization and associated infrastructure development, operation, and maintenance included in the various planning documents of Placer County and the

¹ Air districts in the region are PCAPCD, Sacramento Metropolitan Air Quality Management District, El Dorado County Air Quality Management District, FRAQMD, and the Yolo-Solano Air Quality Management District.

City of Lincoln as well as future projects of SPRTA and PCWA, such as local transportation and water projects.

Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

Under Alternative 1, air pollutant and GHG emissions from a variety of sources (including mobile, stationary, and area) could exceed applicable air quality plans and air district significance thresholds throughout the Plan Area in the future.

If construction emissions from these sources exceed PCAPCD significance thresholds, the activities could conflict with the *1994 Sacramento Area Regional Ozone Attainment Plan* (1994 SIP), *2013 SIP Revisions to the Sacramento Regional 8-Hour Ozone Attainment and Reasonable Further Progress Plan* (2013 Ozone SIP), *2013 PM2.5 Implementation and Maintenance Plan* (PCAPCD PM2.5 Plan), and the *Northern Sacramento Valley Planning Area 2015 Triennial Air Quality Attainment Plan* (2015 Triennial Plan), and the impact would be significant.

If construction emissions from implementation of these sources exceed FRAQMD significance thresholds, the activities could conflict with the 1994 SIP, *2005 Implementation of SB656 Measures to Reduce Particulate Matter Plan* (2005 PM10 Plan), 2013 Ozone SIP, *2013 Yuba City-Marysville PM2.5 Nonattainment Area Redesignation Request and Maintenance Plan* (FRAQMD PM2.5 Plan), and the 2015 Triennial Plan, and the impact would be significant.

However, various general plan goals, objectives, and actions would restrict air pollutant and GHG emission sources and would help to reduce potential impacts. Without implementation of the PCCP, future projects that would have been covered under implementation of Alternative 2, the proposed action, would not be exempted from obtaining individual permits for impacts on Covered Species; further, air pollutant and GHG emissions would not be addressed through the best management practices (BMPs) and mitigation measures that apply to Alternative 2. Individual projects would need to obtain project-specific approvals and would undergo project-level CEQA review and relevant NEPA review (if applicable) for construction and operations-related air quality effects and would need to mitigate potentially significant air quality impacts to less-than-significant levels.

Emissions resulting from general plan land use assumptions are discussed in the EIRs for the *City of Lincoln General Plan* and the *Placer County General Plan*, described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants in excess of PCAPCD thresholds (City of Lincoln 2008). These emissions could potentially conflict with the applicable air quality plans described above. This impact would be considered significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants in excess of PCAPCD thresholds (Placer County 1994). These emissions could potentially conflict with the applicable air quality plans described above. This impact would be considered significant and unavoidable.

NEPA Determination: Individual projects would need to obtain specific permits or undergo project-specific environmental review (as applicable) to minimize construction and O&M emissions associated with Alternative 1. The EIRs for the City of Lincoln and Placer County general plans

determined that activities in the general plans would be associated with construction and operational emissions that would generate significant amounts of criteria pollutants; therefore, air quality impacts from Alternative 1 would be significant and unavoidable.

CEQA Determination: Individual projects would need to obtain specific permits or undergo project-specific CEQA review to minimize construction and O&M emissions associated with Alternative 1. The EIRs for the City of Lincoln and Placer County general plans determined that activities in the general plans would be associated with construction and operational emissions that would generate significant amounts of criteria pollutants; therefore, air quality impacts from Alternative 1 would be significant and unavoidable.

Impact AQ-2: Violation of any air quality standard or substantial contribution to an existing or projected air quality violation (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As discussed in Impact AQ-1, Alternative 1 would result in air pollutant emissions and earth movement that could generate dust. Future projects would undergo project-specific analysis and CEQA review and relevant NEPA review (if applicable) and would need to mitigate potentially significant air quality emissions impacts to less-than-significant levels.

Emissions resulting from general plan land use assumptions are discussed in the applicable EIRs for the general plans within Placer County, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants (City of Lincoln 2008). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants (Placer County 1994). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Alternative 1 is anticipated to generate air pollutant emissions in excess of general conformity *de minimis* or air district significance thresholds. Therefore, Alternative 1 would violate air quality standards or contribute to an air quality violation.

NEPA Determination: Individual projects would need to obtain specific permits or undergo project-specific NEPA review (as applicable) to minimize construction and O&M emissions associated with Alternative 1. The EIRs for the City of Lincoln and Placer County general plans determined that activities in the general plans would be associated with construction and operational emissions that would exceed general conformity *de minimis* thresholds indicated in Table 4.2-1; therefore, air quality impacts from Alternative 1 would be significant and unavoidable.

CEQA Determination: Individual projects would need to obtain specific permits or undergo project-specific CEQA review to minimize construction and O&M emissions associated with Alternative 1. The EIRs for the City of Lincoln and Placer County general plans determined that

activities in the general plans would be associated with construction and operational emissions that would exceed applicable air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6; therefore, air quality impacts from Alternative 1 would be significant and unavoidable.

Impact AQ-3: Potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As discussed in Impact AQ-1, future projects associated with Alternative 1 would result in air pollutant emissions and earth movement that could generate dust. Future projects would undergo project-specific analysis and CEQA review and relevant NEPA review (if applicable) and would need to mitigate potentially significant air quality and GHG emissions impacts to less than significant levels.

Emissions resulting from general plan land use assumptions are discussed in the applicable EIRs for the general plans within Placer County, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants (City of Lincoln 2008). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants (Placer County 1994). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Alternative 1 is anticipated to generate air pollutant emissions in excess of general conformity *de minimis* or air district significance thresholds since the location and extent of individual projects is unknown at this time. Therefore, Alternative 1 would result in a cumulatively considerable increase in criteria pollutants emissions.

NEPA Determination: Individual projects would need to obtain specific permits or undergo project-specific NEPA review (as applicable) to minimize construction and O&M emissions associated with Alternative 1. The EIRs for the City of Lincoln and Placer County general plans determined that activities in the general plans would be associated with construction and operational emissions that would exceed general conformity *de minimis* thresholds indicated in Table 4.2-1; therefore, air quality impacts from Alternative 1 would be significant and unavoidable.

CEQA Determination: Individual projects would need to obtain specific permits or undergo project-specific CEQA review to minimize construction and O&M emissions associated with Alternative 1. The EIRs for the City of Lincoln and Placer County general plans determined that activities in the general plans would be associated with construction and operational emissions that would exceed applicable air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6; therefore, air quality impacts from Alternative 1 would be significant and unavoidable.

Impact AQ-4: Exposure of sensitive receptors to substantial pollutant concentrations (NEPA: significant and unavoidable; CEQA: significant and unavoidable)***Localized Fugitive Particulate Matter Concentrations***

As discussed in Impact AQ-1, individual projects would need to obtain project-specific approvals and would undergo project-level CEQA review and relevant NEPA review (if applicable) for construction and operations-related air quality emissions effects. The PCAPCD considers fugitive dust impacts to be less than significant with implementation of fugitive dust control measures; see Section 3.2.1 in Chapter 3, *Affected Environment*, and Appendix F for the discussion of PCAPCD fugitive dust regulations. Implementation of applicable air district fugitive dust control measures shown in Appendix F would ensure compliance of growth activities associated with the Placer County and City of Lincoln general plans with the applicable air district rules, and to avoid significant impacts on receptors from localized fugitive dust generation. Since future projects would undergo project-specific analysis and would need to mitigate potentially significant fugitive particulate matter emission impacts to less-than-significant levels, Alternative 1 is not anticipated to expose persons to significant fugitive particulate matter concentrations. Exhaust-related particulate matter (PM) emissions are discussed below.

Diesel Particulate Matter

As discussed in Impact AQ-1, individual projects would need to obtain project-specific approvals and would undergo project-level CEQA review and relevant NEPA review (if applicable) for construction and operations-related air quality emissions effects. Future projects would undergo project-specific analysis and would need to mitigate potentially significant diesel particulate matter (DPM) emission impacts to less-than-significant levels. In addition, all construction projects must abide by applicable air district rules adopted to reduce emissions throughout the region (refer to Section 3.2.1 of Chapter 3, *Affected Environment*, and Appendix F for relevant PCAPCD rules). These rules would reduce the potential for substantial pollutant emissions, including DPM, from project activities and would minimize air pollution impacts on sensitive receptors. However, since the location and extent of future projects are unknown at this time, there may be instances where project-specific conditions preclude the reduction of health risks below adopted thresholds. Therefore, health impacts from DPM exposure are conservatively considered to be significant and unavoidable.

Localized Carbon Monoxide Concentrations

As discussed in Impact AQ-1, individual projects would need to obtain project-specific approvals and would undergo project-level CEQA review and relevant NEPA review (if applicable) for construction and operations-related air quality emissions effects. Future projects would thus need to mitigate potentially significant CO emission impacts to less-than-significant levels.

Elevated levels of CO concentrations are typically found in areas with significant traffic congestion. CO is a public health concern because it can cause health problems such as fatigue, headache, confusion, dizziness, and even death. Motor vehicles are the dominant source of CO emissions in most areas. High CO levels develop primarily during winter when periods of light winds combine with the formation of ground-level temperature inversions (typically from the evening through early morning). These conditions result in reduced dispersion of vehicle emissions. Motor vehicles also exhibit increased CO emission rates at low air temperatures. CO emission rates from motor vehicles have been declining and are expected to continue to decline in the future. Increases in traffic or

congestion associated with future project construction and O&M are not anticipated to generate CO emissions in violation of the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS). In addition, PCAPCD does not have project- or cumulative-level thresholds of significance for construction or operational CO emissions. Accordingly, Alternative 1 would not contribute to or worsen localized CO concentrations from increased traffic or congestion. Therefore, health impacts from CO exposure are considered to be less than significant.

Asbestos

Depending on a project's size and geographic location, PCAPCD may enforce the California Air Resources Board's (ARB's) applicable air toxic control measures related to naturally occurring asbestos. Projects in areas that are known to contain naturally occurring asbestos or may disturb asbestos in soil or building materials must comply with these measures.

For construction and grading projects that would disturb 1 acre or less, ARB's Airborne Toxic Control Measure (ATCM) requires several specific actions to minimize emissions of dust such as vehicle speed limitations, application of water prior to and during the ground disturbance, keeping storage piles wet or covered, and track-out prevention and removal (California Air Resources Board 2002). Construction projects that would disturb more than 1 acre must prepare and obtain air district approval for an asbestos dust mitigation plan. The plan must specify how the project will minimize emissions and must address specific emission sources. Regardless of the size of the disturbance, activities must not result in emissions that are visible crossing the property line.

Following ARB's guidance above, construction activities associated with Alternative 1 would have a less-than-significant impact on naturally occurring asbestos exposure.

Regarding asbestos-containing materials (ACMs), activities that disturb materials containing any amount of asbestos are subject to certain requirements of the California Division of Occupational Safety and Health (Cal/OSHA) asbestos standard found in 8 California Code of Regulations (CCR) 1529. Typically, removal or disturbance of more than 100 sf of materials containing more than 1% of asbestos must be performed by a registered asbestos abatement contractor, but associated waste labeling is not required if the materials contain 1% or less of asbestos. When the asbestos content of materials exceeds 1%, virtually all requirements of the standard become effective.

Materials containing more than 1% of asbestos are also subject to National Emissions Standards for Hazardous Air Pollutants (NESHAPs). Regulated ACMs (friable ACMs and nonfriable ACMs that will become friable during demolition operations) must be removed from structures before they are demolished. Certain nonfriable ACMs and materials containing 1% or less of asbestos may remain in highway structures, such as guardrail and bridges, during demolition; however, waste handling/disposal issues and Cal/OSHA work requirements may make this cost-prohibitive. With respect to potential worker exposure, notification, and registration requirements, Cal/OSHA defines ACMs as construction materials that contain more than 1% of asbestos (8 CCR 341.6).

Following state and federal guidance above, construction projects would have a less-than-significant impact on asbestos exposure from ACMs.

NEPA Determination: Applicable air district rules and regulations would help reduce effects from naturally occurring asbestos exposure and fugitive PM emissions on sensitive receptors in the vicinity of dust-generating construction activities to less-than-significant levels. Cal/OSHA and NESHAP standards would also reduce ACM exposure to less-than-significant levels. Construction

activities associated with Alternative 1 could result in exposure of sensitive receptors to substantial DPM pollutant concentrations even after NEPA review and implementation of possible mitigation measures. This impact would be conservatively considered significant and unavoidable.

CEQA Determination: Similar to the NEPA conclusion, applicable air district rules and regulations would help reduce effects from naturally occurring asbestos exposure and fugitive PM emissions on sensitive receptors in the vicinity of dust-generating construction activities to less-than-significant levels. Cal/OSHA and NESHAP standards would also reduce ACM exposure to less-than-significant levels. Construction activities associated with Alternative 1 could result in exposure of sensitive receptors to substantial DPM pollutant concentrations even after CEQA review and implementation of possible mitigation measures. This impact would be conservatively considered significant and unavoidable.

Impact AQ-5: Potential to create objectionable odors affecting a substantial number of people (NEPA: less than significant; CEQA: less than significant)

As discussed in Impact AQ-1, future projects would undergo project-specific analysis and CEQA review and relevant NEPA review (if applicable) and would need to mitigate potentially significant air quality emissions impacts to less than significant levels.

Projects associated with Alternative 1 would require heavy-duty diesel-powered equipment that could potentially create objectionable odors. It is expected that some construction activity could occur near sensitive receptors in the city of Lincoln, as well as rural residences throughout the Plan Area. However, construction activities would be temporary in nature and would not be likely to result in nuisance odors that would violate PCAPCD Rule 205. Given mandatory compliance with applicable rules and policies, no construction activities or materials associated with Alternative 1 would create a significant level of objectionable odors.

Additionally, as future development under Alternative 1 must comply with Placer County and the City of Lincoln's zoning ordinances and buffer zone policies, odor-generating uses would only be developed in areas zoned for such uses. Consequently, new odor-generating uses would not be developed near residences or other receptors that would be sensitive to odors.

Therefore, these activities would not create objectionable odors affecting a substantial number of people.

NEPA Determination: Construction activities associated with Alternative 1 could result in exposure of sensitive receptors in the Plan Area to substantial pollutant concentrations and, consequently, objectionable odors. However, future development must comply with air district rules, general plan policies, and the appropriate jurisdiction's zoning ordinances and buffer zone width. Accordingly, this impact would be less than significant.

CEQA Determination: Construction activities associated with Alternative 1 could result in exposure of sensitive receptors in the Plan Area to substantial pollutant concentrations and, consequently, objectionable odors. However, future development must comply with air district rules, general plan policies, and the appropriate jurisdiction's zoning ordinances and buffer zone policies. Accordingly, this impact would be less than significant.

Impact AQ-6: Generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As discussed in Impact AQ-1, future projects associated with Alternative 1 would result in air pollutant and GHG emissions. Future projects would undergo project-specific analysis and CEQA review and relevant NEPA review (if applicable) and would need to mitigate potentially significant air quality and GHG emissions impacts; due to cumulative impacts, project-by-project impacts may not be able to be mitigated to less-than-significant levels.

GHG emissions from development activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Alternative 1 is anticipated to generate a significant amount of GHG emissions within the Plan Area. Therefore, Alternative 1 would result in a significant increase in GHG emissions.

NEPA Determination: As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, NEPA case-law establishes a precedent that GHG impacts should be evaluated in NEPA. Future projects would undergo NEPA review and would need to mitigate potentially significant GHG impacts to less-than-significant levels. Construction and operational activities associated with implementation of the *City of Lincoln General Plan* and the *Placer County General Plan* are anticipated to result in significant emissions of GHGs; this impact would be significant and unavoidable.

CEQA Determination: Construction activities associated with Alternative 1 would result in emissions of GHGs that would potentially exceed PCAPCD GHG thresholds. Future projects would undergo CEQA review and would need to mitigate potentially significant GHG impacts to less-than-significant levels. Construction and operational activities associated with implementation of the *City of Lincoln General Plan* and the *Placer County General Plan* are anticipated to result in significant emissions of GHGs; this impact would be significant and unavoidable.

Impact AQ-7: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

Assembly Bill 32

Assembly Bill (AB) 32 codifies the state's GHG emissions reduction targets for 2020. ARB adopted the 2008 Scoping Plan and 2014 First Update as a framework for achieving AB 32. The 2008 Scoping Plan and 2014 First Update outline a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions.

AB 32 has been implemented effectively with a suite of complementary strategies that serve as a model going forward. California is on target for meeting the GHG emission reduction goal of reducing emissions to 1990 levels by 2020. Many of the GHG reduction measures (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted over the last five years and implementation activities are ongoing.

Construction and O&M activities associated with Alternative 1 within Placer County would be temporary in nature and O&M GHG emissions are assumed to be minor. Furthermore, PCAPCD's GHG significance thresholds described in Section 4.2.1 are based on compliance with AB 32. As described in Impact AQ-6, future projects would undergo project-specific analysis and CEQA review and relevant NEPA review (if applicable) and would need to mitigate potentially significant GHG emissions impacts; due to cumulative impacts, project-by-project impacts may not be able to be mitigated to less-than-significant levels. However, since GHG emissions from construction and operational activities associated with implementation of the *City of Lincoln General Plan* and the *Placer County General Plan* are anticipated to exceed PCAPCD GHG thresholds, even with implementation of applicable air district regulatory measures, including GHG offsets which the City or the County could require, activities within PCAPCD jurisdiction would conflict with AB 32 reduction targets.

Accordingly, activities associated with Alternative 1 within Placer County would conflict with AB 32 reduction targets.

SB 32 and Executive Order S-3-05

As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, Senate Bill (SB) 32 established an interim GHG reduction target of 40% below 1990 levels by 2030, and Executive Order (EO) S-3-05 established a long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used.

ARB adopted the 2017 Climate Change Scoping Plan in November 2017, as a framework to achieve the 2030 GHG reduction goal described in SB 32. The 2017 Scoping Plan carries forward GHG reduction measures from the AB 32 2014 First Update, as well as new potential measures to help achieve the State's 2030 target across all sectors.

Achieving EO S-3-05 will require even more aggressive changes to all sectors of the economy and will require participation of all levels of government to further reduce GHG emissions. The extent to which the proposed Plan's emissions and resulting impacts would be mitigated through implementation of state-wide (or nationwide) changes is not known. Although many GHG reduction measures outlined in the 2017 Scoping Plan will likely continue to be implemented and enhanced beyond the year 2030, no plan for meeting the 2050 GHG reduction goal described in EO S-3-05 has yet been adopted.

Construction and O&M activities beyond year 2020 within PCAPCD boundaries would be considered temporary and O&M activities minor. Future projects would undergo project-specific analysis and CEQA review and relevant NEPA review (if applicable) and would need to mitigate potentially significant GHG emissions impacts; due to cumulative impacts, project-by-project impacts may not be able to be mitigated to less-than-significant levels. However, post-2020 construction- and operational-related GHG emissions associated with implementation of the *City of Lincoln General Plan* and the *Placer County General Plan* are anticipated to exceed PCAPCD GHG significance

thresholds, even with implementation of applicable air district regulatory measures, including GHG offsets which the City or the County could require, and therefore activities within PCAPCD jurisdiction would conflict with SB 32 reduction targets.

Accordingly, activities associated with Alternative 1 within Placer County would conflict with SB 32 and EO S-3-05 reduction targets.

NEPA Determination: As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, NEPA case-law establishes a precedent that GHG impacts should be evaluated in NEPA. Construction and operational activities associated with implementation of the *City of Lincoln General Plan* and the *Placer County General Plan* are anticipated to result in significant emissions of GHGs; this impact would be significant and unavoidable.

CEQA Determination: Construction activities associated with Alternative 1 would result in temporary emissions of GHGs within PCAPCD. Future projects would undergo project-specific analysis and CEQA review and would need to mitigate potentially significant GHG emissions impacts to less than significant levels. However, construction and operational activities associated with implementation of the *City of Lincoln General Plan* and the *Placer County General Plan* would generate significant GHG emissions that are anticipated to conflict with AB 32 and SB 32 reduction goals. Therefore, this impact would be significant and unavoidable.

Alternative 2—Proposed Action

Implementation of Alternative 2, the proposed action, could result in direct, indirect, and/or cumulative impacts on air quality and GHGs.

Under Alternative 2, implementation would include habitat restoration and creation (conservation measures designed to protect, enhance, and restore and improve the ecological function of natural communities, and to avoid, minimize, and compensate for effects on Covered Species); and adaptive management and monitoring activities. Most Covered Activities would require individual permits and approvals pursuant to the local jurisdictions' (i.e., Placer County and the City of Lincoln's) general plans and land use regulations, or the requirements of the implementing agency, and would undergo subsequent project-level CEQA review and relevant NEPA review for construction and operations-related impacts; some Covered Activities, however, may be exempted from environmental review requirements due to project characteristics.

Potential air quality and GHG impacts could occur during construction or maintenance and implementation of the PCCP. Those activities that involve construction and the use of heavy construction equipment or those that involve earthmoving activities could generate exhaust and fugitive dust emissions. The PCCP conservation measures include several physical activities that would involve ground-disturbing activities as listed in Table 2-13.

- Improvement of culverts and other road crossings.
- Mechanical recontouring of vernal pool basins.
- Removal or modification of ditches, raised roads, trails, and other barriers.
- Modification of floodplains to reestablish natural conditions (e.g., levee removal or levee setback)
- Construction of drainage ditches or retention basins and removal of sediment to enhance vernal pool hydrology.

- Removal of fish barriers.
- In-channel work associated with stream enhancement and restoration.
- Excavating or recontouring historical vernal pools, swales, and wetlands to natural bathymetry.

Those conservation measure activities and Covered Activities that involve construction and the use of heavy construction equipment or those that involve earthmoving activities could generate exhaust and fugitive dust emissions.

Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

Under Alternative 2, the proposed action, implementation of the PCCP (i.e., PCCP conservation activities) and Covered Activities would require the use of construction equipment throughout the Plan Area. Equipment would be used for construction activities, as well as O&M activities. The exact locations of construction and O&M activities are currently unknown. These activities would require heavy-duty diesel-powered equipment that would generate air pollutant emissions and earth movement that could generate fugitive dust. If construction emissions from implementation of these activities exceed PCAPCD significance thresholds, the activities could conflict with the applicable PCAPCD air quality plans described in Alternative 1, and the impact would be significant. Standard and additional construction mitigation measures from PCAPCD's CEQA guidelines would reduce the amount of exhaust generated from construction equipment, while PCAPCD's fugitive PM10 mitigation measures would reduce dust impacts; see Section 3.2.1 in Chapter 3, *Affected Environment*, and Appendix F for a description of these regulatory measures.

If construction emissions from implementation of these activities exceed FRAQMD significance thresholds, the activities could conflict with the applicable FRAQMD air quality plans described in Alternative 1, and the impact would be significant. Standard and additional construction mitigation measures from FRAQMD's CEQA guidelines would reduce the amount of exhaust generated from construction equipment, while FRAQMD's Fugitive Dust Control Plan would reduce dust impacts; see Section 3.2.1 in Chapter 3, *Affected Environment*, and Appendix G for a description of these regulatory measures.

This impact would be significant if construction and O&M activities were such that pollutant emissions would exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. Implementation of BMPs included in the Plan, including BMP #6 for Roadside Construction, which includes dust control measures for active construction areas, would reduce these impacts but may not reduce them to a less-than-significant level.

Although construction and O&M activities associated with the Plan would not require a large amount of construction equipment or land disturbance and emissions are anticipated to be minor, FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day may be exceeded by even the relatively minor amount of construction activity associated with Plan implementation, compared with the large amount of construction activity associated with Covered Activities. The relatively minor amount of construction activity associated with effects of the PCCP within Placer County are not anticipated to exceed PCAPCD's construction thresholds for ROG, NO_x, and PM10 of 82 pounds/day. Consequently, no criteria pollutant offsets would be required for activities associated with Plan implementation within PCAPCD jurisdiction. Applicable air district regulatory measures, shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD

jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with the Plan and the City or the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with the Plan are not anticipated to conflict with or obstruct implementation of the applicable air quality plan.

Emissions resulting from the Covered Activities are discussed in the EIRs for the applicable general plans within the PCCP Plan Area, and are described in detail under Alternative 1 and summarized below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants in excess of PCAPCD thresholds (City of Lincoln 2008). These emissions could potentially conflict with the applicable air quality plans described under Impact AQ-1 of Alternative 1. This impact would be considered significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants in excess of PCAPCD thresholds (Placer County 1994). These emissions could potentially conflict with the applicable air quality plans described under Impact AQ-1 of Alternative 1. This impact would be considered significant and unavoidable.

Similar to construction and O&M activities associated with the Plan, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with Covered Activities within FRAQMD jurisdiction are not anticipated to conflict with or obstruct implementation of the applicable air quality plans.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with the PCCP are not anticipated to exceed general conformity *de minimis* thresholds indicated in Table 4.2-1 because the activities associated are anticipated to be minimal and exceeding *de minimis* thresholds requires a significant amount of construction activity. Emissions from construction and O&M activities associated with the Covered Activities, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Effects of implementation of the Plan may exceed FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable FRAQMD regulatory measures shown in Appendix G, Mitigation Measure AQ-1 would reduce emissions from Plan implementation to a level below FRAQMD thresholds. Effects of implementation of the Plan within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant with

implementation of applicable PCAPCD regulatory measures shown in Appendix F. Emissions from construction and O&M activities associated with the Covered Activities, however, could still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable. In addition to the standard mitigation measures and best available mitigation measures shown in Appendix G, MM AQ-1 may be used to further reduce and, if necessary, offset exhaust emissions to below FRAQMD construction thresholds.

Mitigation Measure AQ-1: Implement FRAQMD exhaust controls and criteria pollutant offsets during construction and O&M activities

The proponent shall assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that will be used an aggregate of 40 or more hours for the construction project and apply the following mitigation measure:

The project shall provide a plan for approval by FRAQMD demonstrating that the heavy-duty (equal to or greater than 50 horsepower) off-road equipment to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 5% ROG reduction, 20% NO_x reduction and 45% particulate reduction compared to the most recent ARB fleet average at time of construction. A Construction Mitigation Calculator (MS Excel) may be downloaded from the Sacramento Metropolitan Air Quality Management District web site to perform the fleet average evaluation. The results of the Construction Mitigation Calculator shall be submitted and approved by FRAQMD prior to beginning work.

Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology (Carl Moyer Guidelines), after-treatment products, voluntary offsite mitigation projects, provide funds for air district offsite mitigation projects, and/or other options as they become available. The District should be contacted to discuss alternative measures.

The project shall provide a monthly summary of heavy-duty off-road equipment usage to the District throughout the construction of the project.

Impact AQ-2: Violation of any air quality standard or substantial contribution to an existing or projected air quality violation (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

Under Alternative 2, the proposed action, PCCP implementation and construction and O&M activities associated with Covered Activities would result in air pollutant emissions and earth movement that could generate dust.

This impact would be significant if construction and O&M activities were such that pollutant emissions would exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. Implementation of BMPs included in the Plan, including BMP #6 for Roadside Construction, which includes dust control measures for active construction areas, would reduce criteria pollutant emissions but may not reduce emissions to less-than-significant levels.

As mentioned in Impact AQ-1, applicable air district regulatory measures shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County

(refer to Mitigation Measure AQ-1), would reduce emissions from Plan implementation to a level below air district and *de minimis* thresholds such that emissions would not violate any air quality standard or contribute substantially to an existing or project air quality violation.

Emissions resulting from Covered Activities are discussed in the EIRs for the general plans within the PCCP Plan Area, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants (City of Lincoln 2008). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants (Placer County 1994). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Similar to construction and O&M activities associated with the Plan, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with Covered Activities in Sutter County would be less than significant.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with the PCCP are not anticipated to exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1. Emissions from construction and O&M activities associated Covered Activities, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Activities associated with Plan implementation may result in emissions that exceed FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable FRAQMD regulatory measures shown in Appendix G, MM AQ-1 would reduce emissions from Plan implementation to a level below FRAQMD thresholds. Effects of implementation of the Plan within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant with implementation of applicable PCAPCD regulatory measures shown in Appendix F. Emissions from construction and O&M activities associated with Covered Activities, however, could

still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Mitigation Measure AQ-1: Implement FRAQMD exhaust controls and criteria pollutant offsets during construction and O&M activities

Impact AQ-3: Potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As discussed in Impact AQ-1, PCCP implementation and Covered Activities would require the use of construction equipment that would result in air pollutant emissions and earth movement that could generate dust. These activities could result in a cumulatively considerable increase in criteria pollutants if the activities were such that pollutant emissions would exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. Implementation of BMPs included in the Plan, including BMP #6 for Roadside Construction, which includes dust control measures for active construction areas, would reduce criteria pollutant emissions, but may not reduce emissions to less-than-significant levels.

As mentioned in Impact AQ-1, applicable air district regulatory measures shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from Plan implementation to a level below air district and *de minimis* thresholds such that emissions would not result in a cumulatively considerable increase of any criteria pollutant.

Emissions resulting from Covered Activities are discussed in the EIRs for the general plans within the PCCP Plan Area, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants (City of Lincoln 2008). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants (Placer County 1994). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Similar to construction and O&M activities associated with the Plan, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from

construction and O&M activities associated with Covered Activities in Sutter County would be less than significant.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with the PCCP are not anticipated to exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1. Emissions from construction and O&M activities associated with Covered Activities, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Construction and O&M activities associated with PCCP implementation may result in emissions that exceed FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable FRAQMD regulatory measures shown in Appendix G, MM AQ-1 would reduce emissions from Plan implementation to a level below FRAQMD thresholds. Effects of implementation of the Plan within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant with implementation of applicable PCAPCD regulatory measures shown in Appendix F. Emissions from construction and O&M activities associated with Covered Activities, however, could still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Mitigation Measure AQ-1: Implement Feather River Air Quality Management District exhaust controls and criteria pollutant offsets during construction and operations and maintenance activities

Impact AQ-4: Exposure of sensitive receptors to substantial pollutant concentrations (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

Localized Fugitive Particulate Matter Concentrations

As discussed in Impact AQ-1, PCCP implementation and Covered Activities would require the use of construction equipment that would result in air pollutant emissions and earth movement that could generate dust. Exhaust-related PM emissions are discussed below under *Diesel Particulate Matter*. Most of the fugitive emissions are generated by project site grading and earthmoving activities; O&M activities would generate minor fugitive dust emissions.

PM_{2.5} particles are considered to be inhalable fine particles, and they may adversely affect the human respiratory system (especially in people who are naturally sensitive or susceptible to breathing problems). Although construction activities associated with implementation of the PCCP and Covered Activities would generate fugitive dust emissions, the PCAPCD and FRAQMD consider fugitive dust impacts to be less than significant with implementation of fugitive dust control measures; see Section 3.2.1 in Chapter 3, *Affected Environment*, and Appendices F and G for the discussion of air district fugitive dust regulations. Implementation of applicable air district fugitive dust control measures shown in Appendices F and G would ensure compliance of PCCP activities and

Covered Activities with the applicable air district rules, and to avoid significant impacts on receptors from localized fugitive dust generation.

Diesel Particulate Matter

As discussed in Impact AQ-1, construction and O&M activities associated with PCCP implementation and Covered Activities would result in air pollutant emissions. The locations of construction and O&M activities are currently unknown. It is expected that some construction activity could occur near sensitive receptors in the city of Lincoln, city of Roseville, the unincorporated townsite of Sheridan, as well as scattered rural residences and other sensitive receptors located throughout the Plan Area. However, all construction projects must abide by air district rules and regulatory measures adopted to reduce emissions throughout the region (refer to Section 3.2.1 of Chapter 3, *Affected Environment*, and Appendices F and G for relevant PCAPCD and FRAQMD rules). These rules and regulatory measures would reduce the potential for substantial pollutant emissions, including DPM, from implementation of the PCCP and Covered Activities and would minimize air pollution impacts on sensitive receptors. However, there may be instances where project-specific conditions preclude the reduction of health risks from DPM below adopted thresholds. Therefore, health impacts from DPM exposure are conservatively considered to be significant and unavoidable.

Localized Carbon Monoxide Concentrations

As discussed for Alternative 1, the No Action alternative, CO emission rates from motor vehicles have been declining and are expected to continue to decline in the future because of ARB's Mobile Source Program, which supports replacement of older, higher-emitting vehicles with newer vehicles, and increasingly stringent inspection and maintenance programs, as well as other regulatory requirements, such as AB 1493 (Pavley) of 2002 that mandates regulations to reduce tailpipe GHG emissions that also improve fuel economy.

The Plan Area encompasses a mostly rural region considered attainment for CO, except for the southern portion of the Plan Area considered maintenance areas for CO, under federal and state air quality standards, as shown in Tables 3.2-6 and 3.2-7. Minor increases in traffic and congestion associated with implementation of the PCCP, including habitat restoration, construction, and O&M activities, in different locations throughout the Plan Area would be temporary and minor in any given location. Accordingly, implementation of the PCCP would not contribute to or worsen localized CO concentrations from increased traffic or congestion associated with the Plan. Increases in traffic and congestion associated with Covered Activities, including transportation projects, construction, and O&M activities, in different locations throughout the Plan Area would be temporary in any given location. Neither PCAPCD nor FRAQMD have project- or cumulative-level thresholds of significance for construction or operational CO emissions. Also, CO emissions from Covered Activities are not anticipated to cause a violation of the NAAQS or CAAQS.

Therefore, health impacts from CO exposure are considered to be less than significant.

Asbestos

The eastern portion of the Plan Area under PCAPCD jurisdiction is located in an area that is known to contain naturally occurring asbestos (California Department of Conservation 2000). As discussed for Alternative 1, for construction and grading projects associated with the PCCP that would disturb 1 acre or less, ARB's Asbestos ATCM requires several specific actions to minimize emissions of dust such as vehicle speed limitations, application of water prior to and during the ground disturbance,

keeping storage piles wet or covered, and track-out prevention and removal (California Air Resources Board 2002). Construction projects that would disturb more than 1 acre must prepare and obtain air district approval for an asbestos dust mitigation plan. The plan must specify how the project will minimize emissions and must address specific emission sources. Regardless of the size of the disturbance, activities must not result in emissions that are visible crossing the property line.

Following ARB's guidance above, construction and O&M associated with PCCP implementation and Covered Activities would have a less-than-significant impact on naturally occurring asbestos exposure.

Regarding ACMs, activities that disturb materials containing any amount of asbestos are subject to certain requirements of the Cal/OSHA asbestos standard found in 8 CCR 1529. Typically, removal or disturbance of more than 100 sf of materials containing more than 1% of asbestos must be performed by a registered asbestos abatement contractor, but associated waste labeling is not required if the materials contain 1% or less of asbestos. When the asbestos content of materials exceeds 1%, virtually all requirements of the standard become effective.

Materials containing more than 1% of asbestos are also subject to NESHAPs. Regulated ACMs (friable ACMs and nonfriable ACMs that will become friable during demolition operations) must be removed from structures before they are demolished. Certain nonfriable ACMs and materials containing 1% or less of asbestos may remain in highway structures, such as guardrail and bridges, during demolition; however, waste handling/disposal issues and Cal/OSHA work requirements may make this cost-prohibitive. With respect to potential worker exposure, notification, and registration requirements, Cal/OSHA defines *ACMs* as construction materials that contain more than 1% of asbestos (8 CCR 341.6).

Following state and federal guidance above, construction and O&M associated with PCCP implementation and Covered Activities would have a less-than-significant impact on asbestos exposure from ACMs.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, in addition to applicable air district rules and regulations, would help reduce effects from naturally occurring asbestos exposure and fugitive PM emissions on sensitive receptors in the vicinity of dust-generating Covered Activity and conservation measure work to less-than-significant levels. Cal/OSHA and NESHAP standards would also reduce ACM exposure to less-than-significant levels. Emissions from construction and O&M activities associated with PCCP implementation and Covered Activities, however, could result in exposure of sensitive receptors to substantial DPM pollutant concentrations even with implementation of applicable air district rules and regulations. This impact would be significant and unavoidable.

CEQA Determination: Similar to the NEPA conclusion, implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, in addition to applicable air district rules and regulations, would help reduce effects from naturally occurring asbestos exposure and fugitive PM emissions on sensitive receptors in the vicinity of dust-generating Covered Activity and conservation measure work to less-than-significant levels. Cal/OSHA and NESHAP standards would also reduce ACM exposure to less-than-significant levels. Emissions from construction and O&M activities associated with PCCP implementation and Covered Activities, however, could result in exposure of sensitive receptors to substantial DPM

pollutant concentrations even with implementation of applicable air district rules and regulations. This impact would be considered significant and unavoidable.

Impact AQ-5: Potential to create objectionable odors affecting a substantial number of people (NEPA: less than significant; CEQA: less than significant)

Implementation of the PCCP and Covered Activities would require heavy-duty diesel-powered equipment that could potentially create objectionable odors. It is expected that some construction activity could occur near sensitive receptors in the City of Lincoln, as well as rural residences throughout the Plan Area. However, construction activities would be temporary in nature and would not be likely to result in nuisance odors that would violate PCAPCD Rule 205 or *Sutter County General Plan Policy ER 9.9* (Sutter County 2011). Given mandatory compliance with applicable rules and policies, no construction activities or materials are proposed that would create a significant level of objectionable odors. Furthermore, implementation of BMPs included in the Plan and applicable air district regulatory measures would reduce exhaust emissions during construction and minimize odor impacts on sensitive receptors.

Additionally, as future development from Covered Activities under the PCCP must comply with Placer County and the City of Lincoln's zoning ordinances and buffer zone policies, odor-generating uses would only be developed in areas zoned for such uses. Consequently, new odor-generating uses would not be developed near residences or other receptors that would be sensitive to odors.

Therefore, these activities would not create objectionable odors affecting a substantial number of people.

NEPA Determination: Construction activities associated with the PCCP could result in exposure of sensitive receptors in the Plan Area to substantial pollutant concentrations and, consequently, objectionable odors. However, future development must comply with air district rules, general plan policies, and the appropriate jurisdiction's zoning ordinances and buffer zone policies. Also, with implementation of applicable air district regulations, odor exposure would be further reduced, and this impact would be less than significant.

CEQA Determination: Construction activities associated with the PCCP could result in exposure of sensitive receptors in the Plan Area to substantial pollutant concentrations and, consequently, objectionable odors. However, future development must comply with air district rules, general plan policies, and the appropriate jurisdiction's zoning ordinances and buffer zone policies. Also, with implementation of applicable air district regulations, odor exposure would be further reduced, and this impact would be less than significant. No mitigation has been identified.

Impact AQ-6: Generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described in Section 4.2.1 and shown in Table 4.2-4, PCAPCD has formally adopted GHG thresholds for construction and operation activities. Because FRAQMD has not established thresholds of significance to evaluate GHG emissions and based on consultation with FRAQMD planning staff, PCAPCD GHG thresholds are used to evaluate construction and O&M activities associated with Plan implementation and Covered Activities within PCAPCD's and FRAQMD's jurisdiction (Spaethe pers. comm.). Implementation of the PCCP and Covered Activities would require use of heavy-duty construction equipment, which would generate GHG emissions.

Construction and O&M activities associated with the Plan would not require a large amount of construction equipment, and emissions are anticipated to be minor. The relatively minor amount of construction activity associated with effects of the PCCP within Placer and Sutter Counties is not anticipated to exceed PCAPCD's GHG thresholds. Applicable air district regulatory measures would further reduce GHG emissions from Plan implementation within Placer and Sutter Counties. Consequently, construction and O&M activities associated with Plan implementation would not generate a significant amount of GHG emissions.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Similar to construction and O&M activities associated with the Plan, construction and O&M emissions associated with Covered Activities within Sutter County are not anticipated to exceed PCAPCD's GHG thresholds. Applicable air district regulatory measures would further reduce GHG emissions from Covered Activities within Sutter County. Consequently, construction and O&M activities associated with Covered Activities in Sutter County would not generate a significant amount of GHG emissions. This impact would be less than significant.

NEPA Determination: As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, NEPA case-law establishes a precedent that GHG impacts should be evaluated in NEPA. Construction and O&M activities associated with implementation of the PCCP would result in temporary emissions of GHGs. Emissions resulting from PCCP implementation are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Emissions from construction and O&M activities associated with Covered Activities, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4. This impact would be significant and unavoidable.

NEPA also requires an evaluation of how a project will adapt to the effects of climate change. Since it is unknown at this time the extent, duration, and physical manifestation of activities associated with the PCCP, the analysis of climate change effects would be evaluated on a project-by-project basis during future NEPA project review. However, general effects of climate change that could affect the Plan Area include the following.

- Decreased water quality, supply, and availability.
- Increased temperatures leading to increases in ozone pollution levels.
- Extirpation or extinction of plant and wildlife species.
- Increased vulnerability of forests due to pest infestation and increased temperatures.

- Increased challenges for the agricultural industry due to potential water shortages and higher temperatures.

CEQA Determination: Construction and O&M activities associated with implementation of the PCCP would result in temporary emissions of GHGs. Emissions resulting from PCCP implementation are not anticipated to exceed PCAPCD's construction threshold 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Emissions from construction and O&M activities associated with Covered Activities, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4. This impact would be significant and unavoidable.

Impact AQ-7: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

Assembly Bill 32

AB 32 codifies the state's GHG emissions reduction targets for 2020. ARB adopted the 2008 Scoping Plan and 2014 First Update as a framework for achieving AB 32. The 2008 Scoping Plan and 2014 First Update outline a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, ARB adopted the *2017 Climate Change Scoping Plan* in November 2017, and it proposes continuing the major programs of the AB 32 Scoping Plan.

AB 32 has been implemented effectively with a suite of complementary strategies that serve as a model going forward. California is on target for meeting the GHG emission reduction goal of reducing emissions to 1990 levels by 2020. Many of the GHG reduction measures (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted over the last five years and implementation activities are ongoing.

Effects resulting from PCCP implementation and Covered Activities within Placer County would be temporary in nature, and O&M GHG emissions are assumed to be minor. Furthermore, PCAPCD's GHG significance thresholds described in Section 4.2.1 are based on compliance with AB 32. As described in Impact AQ-6, construction- and operation-related GHG emissions associated with PCCP implementation activities within Placer County are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, effects within Placer County resulting from PCCP implementation would not conflict with AB 32 reduction targets.

Effects resulting from PCCP implementation within Sutter County would also be temporary in nature, and O&M emissions would be minor. The activities would be consistent with construction-related measures in the *Sutter County Climate Action Plan* (Sutter County CAP) (Sutter County 2010), which was adopted to support overall AB 32 reduction targets. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from PCCP implementation are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, emissions within Sutter County associated with PCCP implementation would not conflict with AB 32 reduction targets.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities resulting from the

implementation of the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Emissions resulting from Covered Activities within Sutter County would also be temporary in nature. The activities would be consistent with construction-related measures in the Sutter County CAP, which was adopted to support overall AB 32 reduction targets. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, emissions within Sutter County associated with Covered Activities would not conflict with AB 32 reduction targets.

Accordingly, Covered Activities associated with the PCCP within Placer County would conflict with AB 32 reduction targets.

SB 32 and Executive Order S-3-05

As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, SB 32 established an interim GHG reduction target of 40% below 1990 levels by 2030, and EO S-3-05 established a long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used.

ARB adopted the 2017 Climate Change Scoping Plan in November 2017, as a framework to achieve the 2030 GHG reduction goal described in SB 32. The 2017 Scoping Plan carries forward GHG reduction measures from the AB 32 2014 First Update, as well as new potential measures to help achieve the State's 2030 target across all sectors.

Achieving EO S-3-05 will require even more aggressive changes to all sectors of the economy and will require participation of all levels of government to further reduce GHG emissions. The extent to which the proposed Plan's emissions and resulting impacts would be mitigated through implementation of state-wide (or nationwide) changes is not known. Although many GHG reduction measures outlined in the 2017 Scoping Plan will likely continue to be implemented and enhanced beyond the year 2030, no plan for meeting the 2050 GHG reduction goal described in EO S-3-05 has yet been adopted.

Emissions resulting from PCCP implementation and Covered Activities beyond year 2020 within Placer County would be considered temporary, and emissions from O&M activities would be minor. As described in Impact AQ-6, construction-related GHG emissions within Placer County resulting from PCCP implementation are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, effects within Placer County associated with the PCCP would not conflict with SB 32 reduction targets. However, because PCAPCD recommends GHG offsets for a 20-year period for operations (and only for the periods of activity exceeding thresholds for construction activities), they would not help meet the 2050 EO S-3-

05 reduction targets. Lead Agencies may require offsets, but they would not help in meeting 2050 targets.

Emissions resulting from PCCP implementation and Covered Activities beyond year 2020 within Sutter County would also be temporary in nature, and O&M emissions would be minor. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from PCCP implementation and Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, effects within Sutter County associated with PCCP implementation would not conflict with SB 32 reduction targets. However, because PCAPCD recommends GHG offsets for a 20-year period for operations (and only for the periods of activity exceeding thresholds for construction activities), they would not help meet the 2050 EO S-3-05 reduction targets. Lead Agencies may require offsets, but they would not help in meeting 2050 targets.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Emissions resulting from Covered Activities within Sutter County would also be temporary in nature. The activities would be consistent with construction-related measures in the Sutter County CAP. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, emissions within Sutter County associated with Covered Activities would not conflict with SB 32 reduction targets.

Accordingly, Covered Activities associated with the PCCP within Placer County would conflict with SB 32 and EO S-3-05 reduction targets.

NEPA Determination: As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, NEPA case-law establishes a precedent that GHG impacts should be evaluated in NEPA. Construction and O&M activities associated with implementation of the PCCP would result in temporary emissions of GHGs. Emissions resulting from activities associated with PCCP implementation are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Emissions resulting from PCCP implementation would not conflict with AB 32 or SB 32. Emissions from construction and O&M activities associated with Covered Activities, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4 and would conflict with AB 32 and SB 32. This impact would be significant and unavoidable.

CEQA Determination: Construction and O&M activities associated with implementation of the PCCP would result in temporary emissions of GHGs. Emissions resulting from activities associated with PCCP implementation are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Emissions resulting from PCCP implementation would not conflict with AB 32 or SB 32. Emissions from construction and O&M activities associated with Covered Activities, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4 and would conflict with AB 32 and SB 32. This impact would be significant and unavoidable.

Alternative 3—Reduced Take/Reduced Fill

Under Alternative 3, there would be a reduction in land conversion in the Potential Future Growth Area (PFG) from that proposed in the proposed action of approximately 1,000 acres, as described in Section 2.4.3.

The PCCP conservation strategy and its components, designed to provide for conservation of landscapes, natural communities, and Covered Species, would be the same under Alternative 3 as under the proposed action.

Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-1 for Alternative 2, the proposed action, implementation of the PCCP and Covered Activities would require the use of construction equipment throughout the Plan Area.

Emissions resulting from the full range of Covered Activities, including area sources and point sources, are discussed in the EIRs for the general plans within the PCCP Plan Area, and are described below.

Alternative 3 would reallocate future land development to other land cover types, resulting in a corresponding increase in conversion of some of the other natural community types, and the total extent of land conversion in the Valley PFG would be reduced by approximately 1,000 acres; however, the overall construction activity and development that would occur under Alternative 3 would be comparable to what is proposed under Alternative 2, the proposed action. Equipment would be used for construction and O&M activities associated with implementation of the PCCP as described above for Alternative 2, but the locations of construction and O&M activities are currently unknown for this and the other alternatives.

As described under Impact AQ-1 for Alternative 2, if construction- and operational-related emissions from implementation of these activities exceed air district thresholds, the activities could conflict with the air quality plans in the applicable air district, and the impact would be significant. Although implementation of Alternative 3 would result in a reduction in the overall potential footprint for urban development in the Plan Area, this impact would be significant if pollutant emissions would exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. Implementation of BMPs included in the Plan, including BMP #6 for Roadside Construction, which includes dust control measures for active construction areas, would reduce these impacts but may not reduce them to a less-than-significant level.

Although PCCP implementation would not require a large amount of construction equipment or land disturbance and emissions are anticipated to be minor, FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day may be exceeded by even the relatively minor amount of construction activity associated with Plan implementation, compared with the large amount of construction activity associated with Covered Activities. Effects of the PCCP within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant. Applicable air district regulatory measures, shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with the Plan, and the City or the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan associated with construction and operational emissions from anticipated growth would generate significant amounts of criteria pollutants in excess of PCAPCD thresholds (City of Lincoln 2008). These emissions could potentially conflict with the applicable air quality plans described under Impact AQ-1 of Alternative 2, the proposed action. This impact would be considered significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants in excess of PCAPCD thresholds (Placer County 1994). These emissions could potentially conflict with the applicable air quality plans described under Impact AQ-1 of Alternative 2, the proposed action. This impact would be considered significant and unavoidable.

Similar to construction and O&M activities associated with the Plan, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with Covered Activities are not anticipated to conflict with or obstruct implementation of the applicable air quality plan.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with effects resulting from implementation of the PCCP under Alternative 3 are not anticipated to exceed general conformity *de minimis* thresholds indicated in Table 4.2-1 as these activities are anticipated to be minimal and exceeding *de minimis* thresholds requires a significant amount of construction activity to occur. Emissions from construction and O&M activities associated with Covered Activities under Alternative 3, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Effects resulting from implementation of the PCCP under Alternative 3 may exceed FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable FRAQMD regulatory measures shown in Appendix G, Mitigation Measure AQ-1 would reduce emissions from PCCP implementation to a level below FRAQMD thresholds. Effects of implementation of the PCCP within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant with implementation of applicable PCAPCD regulatory measures shown in Appendix F. Emissions from construction and O&M activities associated with Covered Activities, however, could still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Mitigation Measure AQ-1: Implement FRAQMD exhaust controls and criteria pollutant offsets during construction and O&M activities

Impact AQ-2: Violation of any air quality standard or substantial contribution to an existing or projected air quality violation (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-2 for Alternative 2, the proposed action, PCCP implementation and construction and O&M activities associated with Covered Activities would result in air pollutant emissions and earth movement that could generate dust. Alternative 3 would reallocate future land development to other land cover types, resulting in a corresponding increase in conversion of some of the other natural community types, and the total extent of land conversion in the Valley PFG would be reduced by approximately 1,000 acres; however, the overall construction activity that would occur under Alternative 3 would be comparable to what is proposed under Alternative 2.

This impact would be significant if construction and O&M activities were such that pollutant emissions would exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. Implementation of BMPs included in the Plan, including BMP #6 for Roadside Construction, which includes dust control measures for active construction areas, would reduce criteria pollutant emissions, but may not reduce emissions to less-than-significant levels.

As mentioned in Impact AQ-1, applicable air district regulatory measures shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from PCCP implementation to a level below air district and *de minimis* thresholds such that emissions would not violate any air quality standard or contribute substantially to an existing or project air quality violation.

Emissions resulting from Covered Activities are discussed in the EIRs for the general plans within the Plan Area, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants (City of Lincoln 2008). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants (Placer County 1994). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Similar to construction and O&M activities associated with the PCCP, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with Covered Activities in Sutter County would be less than significant.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with resulting from implementation of the PCCP under Alternative 3 are not anticipated to exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1. Emissions from construction and O&M activities associated with Covered Activities under Alternative 3, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Effects resulting from implementation of the PCCP under Alternative 3 may exceed FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable FRAQMD regulatory measures shown in Appendix G, Mitigation Measure AQ-1 would reduce emissions from PCCP implementation to a level below FRAQMD thresholds. Effects of implementation of the PCCP within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant with implementation of applicable PCAPCD regulatory measures shown in Appendix F. Emissions from construction and O&M activities associated with Covered Activities under Alternative 3, however, could still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Mitigation Measure AQ-1: Implement FRAQMD exhaust controls and criteria pollutant offsets during construction and O&M activities

Impact AQ-3: Potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-3 for Alternative 2, the proposed action, effects of Covered Activities under Alternative 3 and effects of implementation of the PCCP would result in air pollutant emissions and earth movement that could generate dust. Alternative 3 would reallocate future land development to other land cover types, resulting in a corresponding increase in conversion of some of the other natural community types, and the total extent of land conversion in the Valley PFG would be reduced by approximately 1,000 acres; however, the overall construction activity that would occur under Alternative 3 would be comparable to what is proposed under Alternative 2.

As mentioned in Alternative 2, applicable air district regulatory measures shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions resulting from PCCP implementation to a level below air district and *de minimis* thresholds such that emissions would not result in a cumulatively considerable increase of any criteria pollutant.

Emissions resulting from Covered Activities are discussed in the EIRs for the general plans within the Plan Area, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants (City of Lincoln 2008). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants (Placer County 1994). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Similar to construction and O&M activities associated with the PCCP, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with Covered Activities in Sutter County would be less than significant.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with implementation of the PCCP

under Alternative 3 are not anticipated to exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1. Emissions from construction and O&M activities associated with Covered Activities under Alternative 3, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Effects may exceed FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable FRAQMD regulatory measures shown in Appendix G, Mitigation Measure AQ-1 would reduce emissions from PCCP implementation to a level below FRAQMD thresholds. Effects of implementation of the PCCP within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant with implementation of applicable PCAPCD regulatory measures shown in Appendix F. Emissions from construction and O&M activities associated with Covered Activities under Alternative 3, however, could still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Mitigation Measure AQ-1: Implement FRAQMD exhaust controls and criteria pollutant offsets during construction and O&M activities

Impact AQ-4: Exposure of sensitive receptors to substantial pollutant concentrations (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-4 for Alternative 2, the proposed action, effects of the PCCP and effects of Covered Activities under Alternative would result in air pollutant emissions and earth movement that could generate dust. Alternative 3 would reallocate future land development to other land cover types, resulting in a corresponding increase in conversion of some of the other natural community types, and the total extent of land conversion in the Valley PFG would be reduced by approximately 1,000 acres; however, the overall construction activity that would occur under Alternative 3 would be comparable to what is proposed under Alternative 2.

Localized Fugitive Particulate Matter Concentrations

As described under Impact AQ-4 for Alternative 2, effects of the PCCP and effects associated with Covered Activities under Alternative 3 would result in air pollutant emissions and earth movement that could generate dust. Exhaust-related PM emissions are discussed below under *Diesel Particulate Matter*. Most of the fugitive emissions are generated by project site grading and earthmoving activities; O&M activities would generate minor fugitive dust emissions.

PM_{2.5} particles are considered to be inhalable fine particles, and they may adversely affect the human respiratory system (especially in people who are naturally sensitive or susceptible to breathing problems). Although construction activities associated with Alternative 3 would generate fugitive dust emissions, the PCAPCD and FRAQMD consider fugitive dust impacts to be less than significant with implementation of fugitive dust control measures; see Section 3.2.1 in Chapter 3, *Affected Environment*, and Appendices F and G for the discussion of air district fugitive dust regulations. Implementation of applicable air district fugitive dust control measures shown in Appendices F and G would ensure compliance of Alternative 3 activities and Covered Activities with

the applicable air district rules, and to avoid significant impacts on receptors from localized fugitive dust generation.

Diesel Particulate Matter

As described under Impact AQ-4 for Alternative 2, effects of the PCCP and effects associated with Covered Activities under Alternative 3 would result in air pollutant emissions. The locations of construction and O&M activities are currently unknown. It is expected that some construction activity could occur near sensitive receptors in the city of Lincoln, city of Roseville, the unincorporated townsite of Sheridan, as well as rural residences throughout the Plan Area. However, all construction projects must abide by air district rules and regulatory measures adopted to reduce emissions throughout the region (refer to Section 3.2.1 of Chapter 3, *Affected Environment*, and Appendices F and G for relevant PCAPCD and FRAQMD rules). These rules and regulatory measures would reduce the potential for substantial pollutant emissions, including DPM, from implementation of Alternative 3 and Covered Activities and would minimize air pollution impacts on sensitive receptors. However, there may be instances where project-specific conditions preclude the reduction of health risks from DPM below adopted thresholds. Therefore, health impacts from DPM exposure are conservatively considered to be significant and unavoidable.

Localized Carbon Monoxide Concentrations

As described under Impact AQ-4 for Alternative 2, the Plan Area encompasses a mostly rural region considered attainment for CO, except for the southern portion of the Plan Area considered maintenance areas for CO, under federal and state air quality standards, as shown in Tables 3.2-6 and 3.2-7. Minor increases in traffic and congestion associated with implementation of Alternative 3, including habitat restoration, construction, and O&M activities, in different locations throughout the Plan Area would be temporary and minor in any given location. Accordingly, implementation of Alternative 3 would not contribute to or worsen localized CO concentrations from increased traffic or congestion associated with the PCCP. Increases in traffic and congestion associated with Covered Activities, including transportation projects, construction, and O&M activities, in different locations throughout the Plan Area would be temporary in any given location. Neither PCAPCD nor FRAQMD have project- or cumulative-level thresholds of significance for construction or operational CO emissions. Also, CO emissions from Covered Activities are not anticipated to cause a violation of the NAAQS or CAAQS.

Therefore, health impacts from CO exposure are considered to be less than significant.

Asbestos

As described under Impact AQ-4 for Alternative 2, the eastern portion of the Plan Area is located in an area that is known to contain naturally occurring asbestos (California Department of Conservation 2000). For construction and grading projects associated with Alternative 3 that would disturb 1 acre or less, ARB's ATCM requires several specific actions to minimize emissions of dust such as vehicle speed limitations, application of water prior to and during the ground disturbance, keeping storage piles wet or covered, and track-out prevention and removal (California Air Resources Board 2002). Construction projects that would disturb more than 1 acre must prepare and obtain air district approval for an asbestos dust mitigation plan. The plan must specify how the project will minimize emissions and must address specific emission sources. Regardless of the size of the disturbance, activities must not result in emissions that are visible crossing the property line.

Following ARB's guidance above, construction activities associated with Alternative 4 would have a less-than-significant impact on naturally occurring asbestos exposure.

Regarding ACMs, activities that disturb materials containing any amount of asbestos are subject to certain requirements of the Cal/OSHA asbestos standard found in 8 CCR 1529. Typically, removal or disturbance of more than 100 sf of materials containing more than 1% of asbestos must be performed by a registered asbestos abatement contractor, but associated waste labeling is not required if the materials contain 1% or less of asbestos. When the asbestos content of materials exceeds 1%, virtually all requirements of the standard become effective.

Materials containing more than 1% of asbestos are also subject to NESHAPs. Regulated ACMs (friable ACMs and nonfriable ACMs that will become friable during demolition operations) must be removed from structures before they are demolished. Certain nonfriable ACMs and materials containing 1% or less of asbestos may remain in highway structures, such as guardrail and bridges, during demolition; however, waste handling/disposal issues and Cal/OSHA work requirements may make this cost-prohibitive. With respect to potential worker exposure, notification, and registration requirements, Cal/OSHA defines *ACMs* as construction materials that contain more than 1% of asbestos (8 CCR 341.6).

Following state and federal guidance above, construction and O&M associated with PCCP implementation and Covered Activities would have a less-than-significant impact on asbestos exposure from ACMs.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, in addition to applicable air district rules and regulations, would help reduce effects from naturally occurring asbestos exposure and fugitive PM emissions on sensitive receptors in the vicinity of dust-generating Covered Activity and conservation measure work to less-than-significant levels. Cal/OSHA and NESHAP standards would also reduce ACM exposure to less-than-significant levels. Emissions from construction and O&M activities associated with PCCP implementation and Covered Activities, however, could result in exposure of sensitive receptors to substantial DPM pollutant concentrations even with implementation of applicable air district rules and regulations. This impact would be considered significant and unavoidable.

CEQA Determination: Similar to the NEPA conclusion, implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, in addition to applicable air district rules and regulations, would help reduce effects from naturally occurring asbestos exposure and fugitive PM emissions on sensitive receptors in the vicinity of dust-generating Covered Activity and conservation measure work to less-than-significant levels. Cal/OSHA and NESHAP standards would also reduce ACM exposure to less-than-significant levels. Emissions from construction and O&M activities associated with PCCP implementation and Covered Activities, however, could result in exposure of sensitive receptors to substantial DPM pollutant concentrations even with implementation of applicable air district rules and regulations. This impact would be considered significant and unavoidable.

Impact AQ-5: Potential to create objectionable odors affecting a substantial number of people (NEPA: less than significant; CEQA: less than significant)

Effects of implementation of the PCCP under Alternative 3 and effects associated with Covered Activities under Alternative 3 would require heavy-duty diesel-powered equipment that could potentially create objectionable odors. It is expected that some construction activity could occur near sensitive receptors in the city of Lincoln, as well as rural residences throughout the Plan Area. However, construction activities would be temporary in nature and would not be likely to result in nuisance odors that would violate PCAPCD Rule 205 or *Sutter County General Plan Policy ER 9.9* (Sutter County 2011). Given mandatory compliance with applicable rules and policies, no construction activities or materials are proposed that would create a significant level of objectionable odors. Furthermore, implementation of BMPs included in the Plan and applicable air district regulatory measures would reduce exhaust emissions during construction and minimize odor impacts on sensitive receptors.

Additionally, as future development under Alternative 3 must comply with Placer County and the City of Lincoln's zoning ordinances and buffer zone policies, odor-generating uses would only be developed in areas zoned for such uses. Consequently, new odor-generating uses would not be developed near residences or other receptors that would be sensitive to odors.

Therefore, these activities would not create objectionable odors affecting a substantial number of people.

NEPA Determination: Construction and operational activities associated with Alternative 3 could result in exposure of sensitive receptors in the Plan Area to substantial pollutant concentrations and, consequently, objectionable odors. However, future development must comply with air district rules, general plan policies, and the appropriate jurisdiction's zoning ordinances and buffer zone policies. Also, with implementation of applicable air district regulations, odor exposure would be further reduced and this impact would be less than significant.

CEQA Determination: Construction and operational activities associated with Alternative 3 could result in exposure of sensitive receptors in the Plan Area to substantial pollutant concentrations and, consequently, objectionable odors. However, future development must comply with air district rules, general plan policies, and the appropriate jurisdiction's zoning ordinances and buffer zone policies. Also, with implementation of applicable air district regulations, odor exposure would be further reduced and this impact would be less than significant. No mitigation has been identified.

Impact AQ-6: Generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-6 for Alternative 2, PCAPCD has formally adopted GHG thresholds for construction and operation of projects. PCAPCD GHG thresholds will be applied to construction and O&M activities associated with effects within PCAPCD's and FRAQMD's jurisdiction since FRAQMD has not adopted GHG thresholds (Spaethe pers. comm.). The effects of implementation of the PCCP under Alternative 3 and effects associated with Covered Activities under Alternative 3 would require heavy-duty construction equipment, which would generate GHG emissions.

As discussed in Alternative 2, the relatively minor amount of construction activity associated with effects of the PCCP within Placer and Sutter Counties is not anticipated to exceed PCAPCD's GHG thresholds. Applicable air district regulatory measures would further reduce GHG emissions from Plan implementation within Placer and Sutter Counties. Consequently, construction and O&M activities associated with Plan implementation would not generate a significant amount of GHG emissions.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Similar to construction and O&M activities associated with the PCCP, construction emissions associated with Covered Activities within Sutter County are not anticipated to exceed PCAPCD's GHG thresholds. Applicable air district regulatory measures would further reduce GHG emissions from Covered Activities within Sutter County. Consequently, construction and O&M activities associated with Covered Activities in Sutter County would not generate a significant amount of GHG emissions.

NEPA Determination: As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, NEPA case-law establishes a precedent that GHG impacts should be evaluated in NEPA. Construction and O&M activities associated with implementation of Alternative 3 would result in temporary emissions of GHGs. Effects of implementation of the PCCP under Alternative 3 are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Emissions from construction and O&M activities associated with effects of Covered Activities under Alternative 3, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4. This impact would be significant and unavoidable.

NEPA also requires an evaluation of how a project will adapt to the effects of climate change. Since it is unknown at this time the extent, duration, and physical manifestation of activities associated with Alternative 3, the analysis of climate change effects would be evaluated on a project-by-project basis during future NEPA project review. However, general effects of climate change that could affect the Plan Area include the following.

- Decreased water quality, supply, and availability.
- Increased temperatures leading to increases in ozone pollution levels.
- Extirpation or extinction of plant and wildlife species.
- Increased vulnerability of forests due to pest infestation and increased temperatures.
- Increased challenges for the agricultural industry due to potential water shortages and higher temperatures.

CEQA Determination: Construction and O&M activities associated with implementation of Alternative 3 would result in temporary emissions of GHGs. Effects of implementation of the PCCP under Alternative 3 are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Emissions from construction and O&M activities associated with effects of Covered Activities under Alternative 3, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4. This impact would be significant and unavoidable.

Impact AQ-7: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

Assembly Bill 32

AB 32 codifies the state's GHG emissions reduction targets for 2020. ARB adopted the 2008 Scoping Plan and 2014 First Update as a framework for achieving AB 32. The 2008 Scoping Plan and 2014 First Update outline a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, ARB adopted the *2017 Climate Change Scoping Plan Update* in November 2017, and it proposes continuing the major programs of the AB 32 Scoping Plan.

AB 32 has been implemented effectively with a suite of complementary strategies that serve as a model going forward. California is on target for meeting the GHG emission reduction goal of reducing emissions to 1990 levels by 2020. Many of the GHG reduction measures (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted over the last five years and implementation activities are ongoing.

Effects of implementation of the PCCP under Alternative 3 and effects associated with Covered Activities under Alternative 3 within Placer County would be temporary in nature, and O&M GHG emissions are assumed to be minor. Furthermore, PCAPCD's GHG significance thresholds described in Section 4.2.1 are based on compliance with AB 32. As described in Impact AQ-6, construction- and operation-related GHG emissions associated with PCCP implementation activities within Placer County are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, effects of implementation of the PCCP under Alternative 3 within Placer County associated with Alternative 3 would not conflict with AB 32 reduction targets.

Effects of implementation of the PCCP under Alternative 3 and effects associated with Covered Activities under Alternative 3 within Sutter County would also be temporary in nature and O&M emissions would be minor. The activities would be consistent with construction-related measures in the Sutter County CAP, which was adopted to support overall AB 32 reduction targets. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from PCCP implementation and Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, effects of implementation of the PCCP under Alternative 3 within Sutter County associated with Alternative 3 would not conflict with AB 32 reduction targets.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount

of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Emissions resulting from Covered Activities within Sutter County would also be temporary in nature. The activities would be consistent with construction-related measures in the Sutter County CAP, which was adopted to support overall AB 32 reduction targets. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, emissions within Sutter County associated with Covered Activities would not conflict with AB 32 reduction targets.

Accordingly, Covered Activities associated with Alternative 3 within Placer County would conflict with AB 32 reduction targets.

SB 32 and Executive Order S-3-05

As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, SB 32 established an interim GHG reduction target of 40% below 1990 levels by 2030, and EO S-3-05 established a long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used.

ARB adopted the 2017 Climate Change Scoping Plan in November 2017, as a framework to achieve the 2030 GHG reduction goal described in SB 32. The 2017 Scoping Plan carries forward GHG reduction measures from the AB 32 2014 First Update, as well as new potential measures to help achieve the State's 2030 target across all sectors.

Achieving EO S-3-05 will require even more aggressive changes to all sectors of the economy and will require participation of all levels of government to further reduce GHG emissions. The extent to which the proposed Plan's emissions and resulting impacts would be mitigated through implementation of state-wide (or nationwide) changes is not known. Although many GHG reduction measures outlined in the 2017 Scoping Plan will likely continue to be implemented and enhanced beyond the year 2030, no plan for meeting the 2050 GHG reduction goal described in EO S-3-05 has yet been adopted.

Emissions resulting from PCCP implementation and Covered Activities beyond year 2020 within Placer County would be considered temporary, and O&M emissions would be minor. As described in Impact AQ-6, construction- and operation-related GHG emissions associated with PCCP implementation activities within Placer County are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, PCCP implementation under Alternative 3 within Placer County would not conflict with SB 32 reduction targets. However, because PCAPCD recommends GHG offsets for a 20-year period for operations (and only for the periods of activity exceeding thresholds for construction activities),

they would not help meet the 2050 EO S-3-05 reduction targets. Lead Agencies may require offsets, but they would not help in meeting 2050 targets.

Emissions resulting from PCCP implementation and Covered Activities beyond year 2020 within Sutter County would also be temporary in nature, and O&M emissions would be minor. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from PCCP implementation and Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, PCCP implementation under Alternative 4 within Sutter County would not conflict with SB 32 reduction targets. However, because PCAPCD recommends GHG offsets for a 20-year period for operations (and only for the periods of activity exceeding thresholds for construction activities), they would not help meet the 2050 EO S-3-05 reduction targets. Lead Agencies may require offsets, but they would not help in meeting 2050 targets.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Emissions resulting from Covered Activities within Sutter County would also be temporary in nature. The activities would be consistent with construction-related measures in the Sutter County CAP. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, emissions within Sutter County associated with Covered Activities would not conflict with SB 32 reduction targets.

Accordingly, Covered Activities associated with Alternative 3 within Placer County would conflict with SB 32 and EO S-3-05 reduction targets.

NEPA Determination: As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, NEPA case-law establishes a precedent that GHG impacts should be evaluated in NEPA. Construction and O&M activities associated with implementation of the PCCP under Alternative 3 would result in temporary emissions of GHGs. Effects of implementation of the PCCP under Alternative 3 are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Effects of implementation of the PCCP under Alternative 3 would not conflict with AB 32 or SB 32. Emissions from construction and O&M activities associated with Covered Activities under Alternative 3, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4 and would conflict with AB 32 and SB 32. This impact would be significant and unavoidable.

CEQA Determination: Construction and O&M activities associated with implementation of Alternative 3 would result in temporary emissions of GHGs. Effects associated with implementation of the PCCP under Alternative 3 are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Effects from implementation of the PCCP under Alternative 3 would not conflict with AB 32 or SB 32. Emissions from construction and O&M activities associated with Covered Activities under Alternative 3, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4 and would conflict with AB 32 and SB 32. This impact would be significant and unavoidable.

Alternative 4—Reduced Permit Term

Under Alternative 4, the PCCP would include the same permit conditions for Covered Activities and same conservation measures and conservation strategy as the PCCP, except the permit term would be for 30 years instead of 50. Because of the shorter permit term, longer-term projects would not be covered. Additionally, there would be lower levels of urban and suburban development. As a result, the amount of conservation would be less, generally in proportion to the lower level of development. Finally, it is expected that less funding would be needed for acquisition, management, and restoration of a lesser amount of conservation lands (i.e., a smaller conservation strategy).

Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-1 for Alternative 2, the proposed action, PCCP implementation and Covered Activities would require the use of construction equipment throughout the Plan Area. Alternative 4 would reduce the permit term in the Plan Area from 50 years to 30 years and accordingly there would be less growth covered by the PCCP. The form and type of growth is projected to be the same; there would just be less of it with a permit term of 30 years. A shorter permit term would also reduce the amount of conservation that would occur. The overall construction activity and development that would occur under Alternative 4 would be comparable to what is proposed under Alternative 2, the proposed action. Equipment would be used for construction activities, as well as O&M activities, but the locations of construction and O&M activities are currently unknown for this and the other alternatives.

As described under Impact AQ-1 for Alternative 2, if construction- and operational-related emissions from implementation of the PCCP exceed air district thresholds, the activities could conflict with the air quality plans in the applicable air district, and the impact would be significant. Although implementation of Alternative 4 would result in a reduction in the overall potential footprint for urban development in the Plan Area, this impact would be significant if pollutant emissions would exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. Implementation of BMPs included in the Plan, including BMP #6 for Roadside Construction, which includes dust control measures for active construction areas, would reduce these impacts, but may not reduce them to a less-than-significant level.

Although PCCP implementation would not require a large amount of construction equipment or land disturbance and emissions are anticipated to be minor, FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day may be exceeded by even the relatively minor amount of construction activity associated with PCCP implementation, compared with the large amount of construction

activity associated with Covered Activities. Effects of the PCCP within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant. Applicable air district regulatory measures, shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with the PCCP and the City or the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds.

Emissions resulting from Covered Activities are discussed in the EIRs for the general plans within the Plan Area, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants in excess of PCAPCD thresholds (City of Lincoln 2008). These emissions could potentially conflict with the applicable air quality plans described under Impact AQ-1 of Alternative 2, the proposed action. This impact would be considered significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants in excess of PCAPCD thresholds (Placer County 1994). These emissions could potentially conflict with the applicable air quality plans described under Impact AQ-1 of Alternative 2, the proposed action. This impact would be considered significant and unavoidable.

Similar to construction and O&M activities associated with the PCCP, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with Covered Activities are not anticipated to conflict with or obstruct implementation of the applicable air quality plan.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with PCCP implementation under Alternative 4 are not anticipated to exceed general conformity *de minimis* thresholds indicated in Table 4.2-1 because activities associated with PCCP implementation are anticipated to be minimal and exceeding *de minimis* thresholds requires a significant amount of construction activity. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with PCCP implementation under

Alternative 4 may exceed FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable FRAQMD regulatory measures shown in Appendix G, Mitigation Measure AQ-1 would reduce emissions from PCCP implementation to a level below FRAQMD thresholds. Effects of implementation of the PCCP within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant with implementation of applicable PCAPCD regulatory measures shown in Appendix F. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Mitigation Measure AQ-1: Implement FRAQMD exhaust controls and criteria pollutant offsets during construction and O&M activities

Impact AQ-2: Violation of any air quality standard or substantial contribution to an existing or projected air quality violation (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-2 for Alternative 2, the proposed action, PCCP implementation and construction and O&M activities associated with Covered Activities would result in air pollutant emissions and earth movement that could generate dust. Alternative 4 would reduce the potential footprint for urban development and would reduce the amount of conservation in the Plan Area by reducing the permit term in the Plan Area from 50 years to 30 years; however, the overall construction activity that would occur under Alternative 4 would be comparable to what is proposed under Alternative 2.

This impact would be significant if construction and O&M activities were such that pollutant emissions would exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or air district thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. Implementation of BMPs included in the Plan, including BMP #6 for Roadside Construction, which includes dust control measures for active construction areas, would reduce criteria pollutant emissions, but may not reduce emissions to less than significant levels.

As mentioned in Impact AQ-1, applicable air district regulatory measures shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from PCCP implementation to a level below air district and *de minimis* thresholds such that emissions would not violate any air quality standard or contribute substantially to an existing or project air quality violation.

Emissions resulting from Covered Activities are discussed in the EIRs for the general plans within the Plan Area, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants (City of Lincoln 2008). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants (Placer County 1994). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Similar to construction and O&M activities associated with the PCCP, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with Covered Activities in Sutter County would be less than significant.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with PCCP implementation under Alternative 4 are not anticipated to exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions resulting from PCCP implementation under Alternative 4 may exceed FRAQMD's construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable air district regulatory measures, Mitigation Measure AQ-1 would reduce emissions from PCCP implementation to a level below air district thresholds. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Mitigation Measure AQ-1: Implement FRAQMD exhaust controls and criteria pollutant offsets during construction and O&M activities

Impact AQ-3: Potential to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-3 for Alternative 2, the proposed action, PCCP implementation and construction and O&M activities associated with Covered Activities would result in air pollutant emissions and earth movement that could generate dust. Alternative 4 would reduce the potential footprint for urban development and would reduce the amount of conservation in the Plan Area by

reducing the permit term in the Plan Area from 50 years to 30 years; however, the overall construction activity that would occur under Alternative 4 would be comparable to what is proposed under Alternative 2.

As mentioned in Alternative 2, applicable air district regulatory measures shown in Appendices F and G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions resulting from PCCP implementation to a level below air district and *de minimis* thresholds such that emissions would not result in a cumulatively considerable increase of any criteria pollutant.

Emissions resulting from Covered Activities are discussed in the EIRs for the general plans within the Plan Area, and are described below.

The EIR for the *City of Lincoln General Plan* determined that activities in the general plan would be associated with construction and operational emissions from anticipated growth that would generate significant amounts of criteria pollutants (City of Lincoln 2008). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* determined that activities in the general plan would be associated with cumulative emissions from anticipated growth that would generate significant amounts of criteria pollutants (Placer County 1994). These emissions could exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1 or applicable air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Similar to construction and O&M activities associated with the PCCP, construction emissions associated with Covered Activities within Sutter County are anticipated to exceed FRAQMD's construction thresholds for ROG and NO_x. Applicable air district regulatory measures, shown in Appendix G, as well as criteria pollutant offsets for activities within FRAQMD jurisdiction in Sutter County (refer to Mitigation Measure AQ-1), would reduce emissions from construction and O&M activities associated with Covered Activities and the County could require criteria pollutant offsets, reducing emissions below air district and *de minimis* thresholds. Accordingly, emissions from construction and O&M activities associated with Covered Activities in Sutter County would be less than significant.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions from construction and O&M activities associated with PCCP implementation under Alternative 4 are not anticipated to exceed the general conformity *de minimis* thresholds indicated in Table 4.2-1. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could result in short-term exceedances of general conformity *de minimis* thresholds indicated in Table 4.2-1. This impact would be significant and unavoidable.

CEQA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, would help reduce effects on humans in the vicinity of dust-generating Covered Activity and conservation measure work. Emissions resulting from PCCP implementation under Alternative 4 may exceed FRAQMD's

construction thresholds for ROG and NO_x of 25 pounds/day. In addition to applicable FRAQMD regulatory measures shown in Appendix G, MM AQ-1 would reduce emissions from PCCP implementation to a level below FRAQMD thresholds. Effects of implementation of the PCCP within Placer County are not anticipated to exceed PCAPCD's construction thresholds for any criteria pollutant with implementation of applicable PCAPCD regulatory measures shown in Appendix F. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could still result in short-term exceedances of air district significance thresholds indicated in Tables 4.2-2, 4.2-3, 4.2-5, and 4.2-6. This impact would be significant and unavoidable.

Mitigation Measure AQ-1: Implement FRAQMD exhaust controls and criteria pollutant offsets during construction and O&M activities

Impact AQ-4: Exposure of sensitive receptors to substantial pollutant concentrations (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-4 for Alternative 2, the proposed action, PCCP implementation and construction and O&M activities associated with Covered Activities would result in air pollutant emissions and earth movement that could generate dust. Alternative 4 would reduce the potential footprint for urban development and would reduce the amount of conservation in the Plan Area by reducing the permit term in the Plan Area from 50 years to 30 years; however, the overall construction activity that would occur under Alternative 4 would be comparable to what is proposed under Alternative 2.

Localized Fugitive Particulate Matter Concentrations

As described under Impact AQ-4 for Alternative 2, the proposed action, PCCP implementation and construction and O&M activities associated with Covered Activities would result in air pollutant emissions and earth movement that could generate dust. Exhaust-related PM emissions are discussed below under *Diesel Particulate Matter*. Most of the fugitive emissions are generated by project site grading and earthmoving activities; O&M activities would generate minor fugitive dust emissions.

PM_{2.5} particles are considered to be inhalable fine particles, and they may adversely affect the human respiratory system (especially in people who are naturally sensitive or susceptible to breathing problems). Although construction activities associated with Alternative 4 would generate fugitive dust emissions, the PCAPCD and FRAQMD consider fugitive dust impacts to be less than significant with implementation of fugitive dust control measures; see Section 3.2.1 in Chapter 3, *Affected Environment*, and Appendices F and G for the discussion of air district fugitive dust regulations. Implementation of applicable air district fugitive dust control measures shown in Appendices F and G would ensure compliance of Alternative 4 activities and Covered Activities with the applicable air district rules, and to avoid significant impacts on receptors from localized fugitive dust generation.

Diesel Particulate Matter

As described under Impact AQ-4 for Alternative 2, PCCP implementation and construction and O&M activities associated with Covered Activities would result in air pollutant emissions. The locations of construction and O&M activities are currently unknown. It is expected that some construction activity could occur near sensitive receptors in the city of Lincoln, city of Roseville, the unincorporated townsite of Sheridan, as well as rural residences throughout the Plan Area.

However, all construction projects must abide by air district rules and regulatory measures adopted to reduce emissions throughout the region (refer to Section 3.2.1 of Chapter 3, *Affected Environment*, and Appendices F and G for relevant PCAPCD and FRAQMD rules). These rules and regulatory measures would reduce the potential for substantial pollutant emissions, including DPM, from implementation of Alternative 4 and Covered Activities and would minimize air pollution impacts on sensitive receptors. However, there may be instances where project-specific conditions preclude the reduction of health risks from DPM below adopted thresholds. Therefore, health impacts from DPM exposure are conservatively considered to be significant and unavoidable.

Localized Carbon Monoxide Concentrations

The Plan Area encompasses a mostly rural region considered attainment for CO, except for the southern portion of the Plan Area considered maintenance areas for CO, under federal and state air quality standards, as shown in Tables 3.2-6 and 3.2-7. Minor increases in traffic and congestion associated with implementation of Alternative 4, including habitat restoration, construction, and O&M activities, in different locations throughout the Plan Area would be temporary and minor in any given location. Accordingly, implementation of Alternative 4 would not contribute to or worsen localized CO concentrations from increased traffic or congestion associated with the PCCP. Increases in traffic and congestion associated with Covered Activities, including transportation projects, construction, and O&M activities, in different locations throughout the Plan Area would be temporary in any given location. Neither PCAPCD nor FRAQMD have project- or cumulative-level thresholds of significance for construction or operational CO emissions. Also, CO emissions from Covered Activities are not anticipated to cause a violation of the NAAQS or CAAQS.

Therefore, health impacts from CO exposure are considered to be less than significant.

Asbestos

As described under Impact AQ-4 for Alternative 2, the eastern portion of the Plan Area is located in an area that is known to contain naturally occurring asbestos (California Department of Conservation 2000). For construction and grading projects associated with Alternative 4 that would disturb 1 acre or less, ARB's ATCM requires several specific actions to minimize emissions of dust such as vehicle speed limitations, application of water prior to and during the ground disturbance, keeping storage piles wet or covered, and track-out prevention and removal (California Air Resources Board 2002). Construction projects that would disturb more than 1 acre must prepare and obtain air district approval for an asbestos dust mitigation plan. The plan must specify how the project will minimize emissions and must address specific emission sources. Regardless of the size of the disturbance, activities must not result in emissions that are visible crossing the property line.

Following ARB's guidance above, construction activities associated with Alternative 4 would have a less-than-significant impact on naturally occurring asbestos exposure.

Regarding ACMs, activities that disturb materials containing any amount of asbestos are subject to certain requirements of the Cal/OSHA asbestos standard found in 8 CCR 1529. Typically, removal or disturbance of more than 100 sf of materials containing more than 1% of asbestos must be performed by a registered asbestos abatement contractor, but associated waste labeling is not required if the materials contain 1% or less of asbestos. When the asbestos content of materials exceeds 1%, virtually all requirements of the standard become effective.

Materials containing more than 1% of asbestos are also subject to NESHAPs. Regulated ACMs (friable ACMs and nonfriable ACMs that will become friable during demolition operations) must be removed from structures before they are demolished. Certain nonfriable ACMs and materials containing 1% or less of asbestos may remain in highway structures, such as guardrail and bridges, during demolition; however, waste handling/disposal issues and Cal/OSHA work requirements may make this cost-prohibitive. With respect to potential worker exposure, notification, and registration requirements, Cal/OSHA defines *ACMs* as construction materials that contain more than 1% of asbestos (8 CCR 341.6).

Following state and federal guidance above, construction and O&M associated with PCCP implementation and Covered Activities would have a less-than-significant impact on asbestos exposure from ACMs.

NEPA Determination: Implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, in addition to applicable air district rules and regulations, would help reduce effects from naturally occurring asbestos exposure and fugitive PM emissions on sensitive receptors in the vicinity of dust-generating Covered Activity and conservation measure work to less-than-significant levels. Cal/OSHA and NESHAP standards would also reduce ACM exposure to less-than-significant levels. Emissions from construction and O&M activities associated with PCCP implementation and Covered Activities, however, could result in exposure of sensitive receptors to substantial DPM pollutant concentrations even with implementation of applicable air district rules and regulations. This impact would be considered significant and unavoidable.

CEQA Determination: Similar to the NEPA conclusion, implementation of BMPs described in the Plan, which are intended to minimize the effects of dust on vegetation and wildlife habitats in the Plan Area, in addition to applicable air district rules and regulations, would help reduce effects from naturally occurring asbestos exposure and fugitive PM emissions on sensitive receptors in the vicinity of dust-generating Covered Activity and conservation measure work to less-than-significant levels. Cal/OSHA and NESHAP standards would also reduce ACM exposure to less-than-significant levels. Emissions from construction and O&M activities associated with PCCP implementation and Covered Activities, however, could result in exposure of sensitive receptors to substantial DPM pollutant concentrations even with implementation of applicable air district rules and regulations. This impact would be considered significant and unavoidable.

Impact AQ-5: Potential to create objectionable odors affecting a substantial number of people (NEPA: less than significant; CEQA: less than significant)

Construction and O&M activities associated with PCCP implementation and Covered Activities would require heavy-duty diesel-powered equipment that could potentially create objectionable odors. It is expected that some construction activity could occur near sensitive receptors in the city of Lincoln, as well as rural residences throughout the Plan Area. However, construction activities would be temporary in nature and would not be likely to result in nuisance odors that would violate PCAPCD Rule 205 or *Sutter County General Plan Policy ER 9.9* (Sutter County 2011). Given mandatory compliance with applicable rules and policies, no construction activities or materials are proposed that would create a significant level of objectionable odors. Furthermore, implementation of BMPs included in the Plan and applicable air district regulatory measures would reduce exhaust emissions during construction and minimize odor impacts on sensitive receptors.

Additionally, as future development under Alternative 4 must comply with Placer County and the City of Lincoln's zoning ordinances and buffer zone policies, odor-generating uses would only be developed in areas zoned for such uses. Consequently, new odor-generating uses would not be developed near residences or other receptors that would be sensitive to odors.

Therefore, these activities would not create objectionable odors affecting a substantial number of people.

NEPA Determination: Construction activities associated with Alternative 4 could result in exposure of sensitive receptors in the Plan Area to substantial pollutant concentrations and, consequently, objectionable odors. However, future development must comply with air district rules, general plan policies, and the appropriate jurisdiction's zoning ordinances and buffer zone policies. Also, with implementation of applicable air district regulations, odor exposure would be further reduced and this impact would be less than significant.

CEQA Determination: Construction activities associated with Alternative 4 could result in exposure of sensitive receptors in the Plan Area to substantial pollutant concentrations and, consequently, objectionable odors. However, future development must comply with air district rules, general plan policies, and the appropriate jurisdiction's zoning ordinances and buffer zone policies. Also, with implementation of applicable air district regulations, odor exposure would be further reduced and this impact would be less than significant. No mitigation has been identified.

Impact AQ-6: Generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

As described under Impact AQ-6 for Alternative 2, the proposed action, PCAPCD has formally adopted GHG thresholds for construction and operation of projects. PCAPCD GHG thresholds will be applied to construction and O&M activities associated with PCCP implementation and Covered Activities within PCAPCD's and FRAQMD's jurisdiction because FRAQMD has not adopted GHG thresholds (Spaethe pers. comm.). PCCP implementation under Alternative 4 would require heavy-duty construction equipment, which would generate GHG emissions.

As discussed in Alternative 2, the relatively minor amount of construction activity associated with effects of the PCCP within Placer and Sutter Counties is not anticipated to exceed PCAPCD's GHG thresholds. Applicable air district regulatory measures would further reduce GHG emissions from Plan implementation within Placer and Sutter Counties. Consequently, construction and O&M activities associated with Plan implementation would not generate a significant amount of GHG emissions.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively

considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Similar to construction and O&M activities associated with the PCCP, construction and O&M emissions associated with Covered Activities within Sutter County are not anticipated to exceed PCAPCD's GHG thresholds. Applicable air district regulatory measures would further reduce GHG emissions from Covered Activities within Sutter County. Consequently, construction and O&M activities associated with Covered Activities in Sutter County would not generate a significant amount of GHG emissions.

NEPA Determination: As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, NEPA case-law establishes a precedent that GHG impacts should be evaluated in NEPA. Construction and O&M activities associated with implementation of Alternative 4 would result in temporary emissions of GHGs. Emissions resulting from PCCP implementation under Alternative 4 are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4. This impact would be significant and unavoidable.

NEPA also requires an evaluation of how a project will adapt to the effects of climate change. Since it is unknown at this time the extent, duration, and physical manifestation of activities associated with Alternative 4, the analysis of climate change effects would be evaluated on a project-by-project basis during future NEPA project review. However, general effects of climate change that could affect the Plan Area include the following.

- Decreased water quality, supply, and availability.
- Increased temperatures leading to increases in ozone pollution levels.
- Extirpation or extinction of plant and wildlife species.
- Increased vulnerability of forests due to pest infestation and increased temperatures.
- Increased challenges for the agricultural industry due to potential water shortages and higher temperatures.

CEQA Determination: Construction and O&M activities associated with implementation of Alternative 4 would result in temporary emissions of GHGs. Emissions from PCCP implementation under Alternative 4 are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4. This impact would be significant and unavoidable.

Impact AQ-7: Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases (NEPA: significant and unavoidable; CEQA: significant and unavoidable)

Assembly Bill 32

AB 32 codifies the state's GHG emissions reduction targets for 2020. ARB adopted the 2008 Scoping Plan and 2014 First Update as a framework for achieving AB 32. The 2008 Scoping Plan and 2014 First Update outline a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, ARB adopted the *2017 Climate Change Scoping Plan Update* in November 2017, and it proposes continuing the major programs of the AB 32 Scoping Plan.

AB 32 has been implemented effectively with a suite of complementary strategies that serve as a model going forward. California is on target for meeting the GHG emission reduction goal of reducing emissions to 1990 levels by 2020. Many of the GHG reduction measures (e.g., Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade) have been adopted over the last five years and implementation activities are ongoing.

Emissions resulting from PCCP implementation and Covered Activities under Alternative 4 within Placer County would be temporary in nature, and O&M GHG emissions are assumed to be minor. Furthermore, PCAPCD's GHG significance thresholds described in Section 4.2.1 are based on compliance with AB 32. As described in Impact AQ-6, construction- and operation-related GHG emissions associated with PCCP implementation activities within Placer County are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, PCCP implementation under Alternative 4 within Placer County would not conflict with AB 32 reduction targets.

Emissions resulting from PCCP implementation and Covered Activities under Alternative 4 within Sutter County would also be temporary in nature and, and O&M emissions would be minor. The activities would be consistent with construction-related measures in the Sutter County CAP, which was adopted to support overall AB 32 reduction targets. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from PCCP implementation and Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, PCCP implementation under Alternative 4 within Sutter County would not conflict with AB 32 reduction targets.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions that would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Emissions resulting from Covered Activities within Sutter County would also be temporary in nature. The activities would be consistent with construction-related measures in the Sutter County CAP, which was adopted to support overall AB 32 reduction targets. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, emissions within Sutter County associated with Covered Activities would not conflict with AB 32 reduction targets.

Accordingly, Covered Activities associated with Alternative 4 within Placer County would conflict with AB 32 reduction targets.

SB 32 and Executive Order S-3-05

As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, SB 32 established an interim GHG reduction target of 40% below 1990 levels by 2030, and EO S-3-05 established a long-term goal of reducing statewide GHG emissions to 80% below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used.

ARB adopted the 2017 Climate Change Scoping Plan in November 2017, as a framework to achieve the 2030 GHG reduction goal described in SB 32. The 2017 Scoping Plan carries forward GHG reduction measures from the AB 32 2014 First Update, as well as new potential measures to help achieve the State's 2030 target across all sectors.

Achieving EO S-3-05 will require even more aggressive changes to all sectors of the economy and will require participation of all levels of government to further reduce GHG emissions. The extent to which the proposed Plan's emissions and resulting impacts would be mitigated through implementation of state-wide (or nationwide) changes is not known. Although many GHG reduction measures outlined in the 2017 Scoping Plan will likely continue to be implemented and enhanced beyond the year 2030, no plan for meeting the 2050 GHG reduction goal described in EO S-3-05 has yet been adopted.

Emissions resulting from PCCP implementation and Covered Activities beyond year 2020 within Placer County would be considered temporary, and O&M emissions would be minor. As described in Impact AQ-6, construction- and operation-related GHG emissions associated with PCCP implementation activities within Placer County are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, PCCP implementation under Alternative 4 within Placer County would not conflict with SB 32 reduction targets. However, because PCAPCD recommends GHG offsets for a 20-year period for operations (and only for the periods of activity exceeding thresholds for construction activities), they would not help meet the 2050 EO S-3-05 reduction targets. Lead Agencies may require offsets, but they would not help in meeting 2050 targets.

Emissions resulting from PCCP implementation and Covered Activities beyond year 2020 within Sutter County would also be temporary in nature, and O&M emissions would be minor. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from PCCP implementation and Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, PCCP implementation under Alternative 4 within Sutter County would not conflict with SB 32 reduction targets. However, because PCAPCD recommends GHG offsets for a 20-year period for operations (and only for the periods of activity exceeding thresholds for construction activities),

they would not help meet the 2050 EO S-3-05 reduction targets. Lead Agencies may require offsets, but they would not help in meeting 2050 targets.

GHG emissions that would be associated with Covered Activities are discussed in the EIR for the *City of Lincoln General Plan*. This EIR determined that development activities in the general plan would be associated with construction and operational emissions that would generate a significant amount of GHG emissions (City of Lincoln 2008). These emissions would be considered to potentially make a cumulatively considerable incremental contribution to global climate change. This impact would be significant and unavoidable.

The EIR for the *Placer County General Plan* did not analyze GHG emissions (Placer County 1994). However, the level of growth associated with the general plan would be expected to generate a significant amount of GHG emissions which would be considered to potentially make a cumulatively considerable incremental contribution to global climate change and result in a significant and unavoidable impact.

Emissions resulting from Covered Activities within Sutter County would also be temporary in nature. The activities would be consistent with construction-related measures in the Sutter County CAP. As described in Impact AQ-6, construction-related GHG emissions in Sutter County resulting from Covered Activities are not anticipated to exceed PCAPCD thresholds, and implementation of PCAPCD regulatory measures would further reduce GHG emissions. Therefore, emissions within Sutter County associated with Covered Activities would not conflict with SB 32 reduction targets.

Accordingly, Covered Activities associated with Alternative 4 within Placer County would conflict with SB 32 and EO S-3-05 reduction targets.

NEPA Determination: As discussed in Section 3.2.1 of Chapter 3, *Affected Environment*, NEPA case-law establishes a precedent that GHG impacts should be evaluated in NEPA. Construction and O&M activities associated with implementation of Alternative 4 would result in temporary emissions of GHGs. Emissions resulting from PCCP implementation under Alternative 4 are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. PCCP implementation under Alternative 4 would not conflict with AB 32 or SB 32. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4 and would conflict with AB 32 and SB 32. This impact would be significant and unavoidable.

CEQA Determination: Construction and O&M activities associated with implementation of Alternative 4 would result in temporary emissions of GHGs. Emissions resulting from PCCP implementation under Alternative 4 are not anticipated to exceed PCAPCD's construction threshold of 10,000 MT CO₂e/year. Applicable air district regulatory measures would further reduce emissions from PCCP implementation. PCCP implementation under Alternative 4 would not conflict with AB 32 or SB 32. Emissions from construction and O&M activities associated with Covered Activities of Alternative 4, however, could still result in short-term exceedances of PCAPCD GHG significance thresholds indicated in Table 4.2-4 and would conflict with AB 32 and SB 32. This impact would be significant and unavoidable.

4.2.3 Cumulative Analysis

Methods and Approach

According to guidance from PCAPCD and FRAQMD, an impact would have a significant cumulative impact if emissions from the project exceeded the district's thresholds, or if the project conflicts with the applicable air quality attainment plan. For this analysis, the applicable air district's thresholds were used to assess cumulative impacts.

Cumulative Impacts

Past, present, and reasonably foreseeable future projects are identified in Section 4.0, *Environmental Consequences*. Overall, these projects have had or are anticipated to have a cumulative impact on air quality as a result of land-disturbing activities such as converting agricultural lands to urban development, including roadway projects, and developing and operating infrastructure projects.

With respect to the action alternatives, emissions resulting from construction and operation of the implementation of the Covered Activities, including implementation of the PCCP conservation strategy, in combination with other development in the Sacramento Valley and Mountain Counties Air Basins, could result in cumulatively significant levels of emissions under all alternatives. As discussed above, some of the Covered Activities would generate emissions that could exceed applicable air district thresholds, which, according to PCAPCD and FRAQMD guidance, would result in cumulative impacts. Implementation of applicable air district regulatory measures would reduce emissions; however, it is anticipated they would not reduce construction emissions to below applicable air district thresholds. As PCAPCD's and FRAQMD's CEQA Handbooks indicate that projects in excess of their numeric thresholds listed in Tables 4.2-2 through 4.2-6 would result in a significant cumulative impact unless offset, this impact is considered significant and unavoidable.

Alternative 1—No Action

Emissions resulting from construction and operation of the land uses resulting from implementation of the local jurisdictions' general plans, in combination with other development in the Sacramento Valley and Mountain Counties Air Basins, could result in cumulatively significant levels of emissions under all alternatives. As discussed above, some land uses would generate emissions that could exceed applicable air district thresholds, which, according to PCAPCD and FRAQMD guidance, would result in cumulative impacts. Implementation of applicable air district regulatory measures would reduce emissions; however, it is anticipated they would not reduce construction- and operation-related emissions to below applicable air district thresholds. As PCAPCD's and FRAQMD's CEQA Handbooks indicate that projects in excess of their numeric thresholds listed in Tables 4.2-2 through 4.2-6 would result in a significant cumulative impact unless offset, this impact is considered significant and unavoidable.

Alternative 2—Proposed Action

Build-out of the general plans for the jurisdictions encompassed by the Plan Area is anticipated to result in cumulative air pollutant and GHG emissions increases related to the construction and operation of various projects in the Plan Area. Emissions from these projects could combine with emissions from Covered Activities associated with the proposed action to result in significant cumulative air quality and GHG emission impacts.

Build-out of the general plans of Placer County and the City of Lincoln, in conjunction with activities associated with Alternative 2, the proposed action, could result in a cumulative impact related to construction- and operation-related air pollutant and GHG emissions. Alternative 2's contribution to this effect would be considered cumulatively considerable, as the magnitude of emissions of air pollutants and GHGs from Covered Activities and other future projects is currently unknown. Although applicable air district regulatory measures, described in Section 3.2.1, *Regulatory Setting*, and shown in Appendices F and G, would reduce the project-related construction and operational air quality and GHG emission impacts, cumulative impacts related to air pollutant and GHG emissions in the Plan Area may still be significant. Cumulative construction- and operation-related air quality and GHG emissions impacts would conservatively be considered to be significant and unavoidable.

In addition to the effects associated with build-out of the general plans, the conservation measures associated with the proposed action would result in temporary construction and maintenance projects and therefore would not result in a substantial permanent increase in air pollutant and GHG emissions in the Plan Area and therefore would not make a cumulatively considerable contribution to a cumulative air quality and GHG emissions impact.

Alternative 3—Reduced Take/Reduced Fill

As discussed for Alternative 2, the proposed action, Alternative 3 would result in a cumulatively considerable contribution to a cumulative construction air quality and GHG emissions impact in the Plan Area. Although applicable air district regulatory measures, described in Section 3.2.1, *Regulatory Setting*, and shown in Appendices F and G, would reduce the project-related construction and operational air quality and GHG emission impacts, cumulative impacts related to air pollutant and GHG emissions in the Plan Area may still be significant. Cumulative construction- and operation-related air quality and GHG emissions impacts would conservatively be considered to be significant and unavoidable.

In addition to the effects associated with build-out of the general plans, the conservation measures associated with Alternative 3 would result in temporary construction and maintenance projects and therefore would not result in a substantial permanent increase in air pollutant and GHG emissions in the Plan Area and therefore would not make a cumulatively considerable contribution to a cumulative air quality and GHG emissions impact.

Alternative 4—Reduced Permit Term

As discussed for Alternative 2, the proposed action, Alternative 4 would result in a cumulatively considerable contribution to a cumulative construction air quality and GHG emissions impact in the Plan Area. Although applicable air district regulatory measures, described in Section 3.2.1, *Regulatory Setting*, and shown in Appendices F and G, would reduce the project-related construction and operational air quality and GHG emission impacts, cumulative impacts related to air pollutant and GHG emissions in the Plan Area may still be significant. Cumulative construction- and operation-related air quality and GHG emissions impacts would conservatively be considered to be significant and unavoidable.

In addition to the effects associated with build-out of the general plans, the conservation measures associated with Alternative 4 would result in temporary construction and maintenance projects and therefore would not result in a substantial permanent increase in air pollutant and GHG emissions in

the Plan Area and therefore would not make a cumulatively considerable contribution to a cumulative operational air quality and GHG emissions impact.

4.2.4 References Cited

Printed References

- California Air Resources Board. 2002. *Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations*. Available: <https://www.arb.ca.gov/toxics/asbestos/atcm/regadv0702.pdf>. Accessed: May 4, 2017.
- California Department of Conservation. 2000. *A General Location Guide for Ultramafic Rocks in California - Areas More Likely to Contain Naturally Occurring Asbestos*. Available: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/ofr_2000-019.pdf. Accessed: May 4, 2017.
- City of Lincoln. 2008. *City of Lincoln General Plan Update Final Environmental Impact Report*. State Clearinghouse No. 2005112003. February.
- Feather River Air Quality Management District. 2010. *Indirect Source Review Guidelines*. Available: <http://www.fraqmd.org/ceqa-planning>. Accessed: May 8, 2017.
- Placer County. 1994. *Placer County General Plan Update: Countywide General Plan Final Environmental Impact Report*. July. Auburn, CA. Prepared by Crawford Multari & Starr, DKS Associates, Psomas and Associates, Jones & Stokes Associates, Recht Hausrath & Associates, and J. Laurence Mintier & Associates.
- Placer County Air Pollution Control District. 2016. *CEQA Thresholds and Review Principles*. Available: <https://www.placer.ca.gov/departments/air/landuseceqa/ceqathresholds>. Accessed: May 4, 2017.
- Sutter County. 2010. *Sutter County Climate Action Plan*. Available: https://www.co.sutter.ca.us/doc/government/depts/cs/ps/gp/gp_home. Accessed: May 26, 2017.
- Sutter County. 2011. *Sutter County General Plan*. Adopted March 2011.

Personal Communications

- Spaethe, Sondra. Air Quality Planner. Feather River Air Quality Management District. May 16, 2017—Email to Darrin Trageser, ICF International, Sacramento, CA, regarding the use of Placer County Air Pollution Control District GHG thresholds.