

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract? (No Impact)

See response to Item 2(a) above. The Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract. The property is not under a Williamson Act contract. Therefore, the solar project would not conflict with existing zoning for agricultural use or a Williamson Act contract.

c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))? (No Impact)

The Project does not involve land that is considered forest land or timberland zoned for timberland production. It is a solar PV project that would occur within an existing oil and gas production site, which is zoned for industrial-oil extraction. Therefore, the project would not conflict with existing zoning for forest or timber land.

d. Result in the loss of forest land or conversion of forest land to non-forest use? (No Impact)

The proposed Project site would be in an existing oil and gas production facility and does not involve conversion of forest land to nonforest use. Therefore, no impact on this topical area would occur.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use? (No Impact)

The proposed Project will not have any impact on farmland or agricultural uses. The Project site is within an existing industrial area. Therefore, the Project will not have any impact that could result in the conversion of property to non-agricultural use.

3.4.3 Air Quality

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a. Conflict with or obstruct implementation of the applicable air quality plan? (Less Than Significant Impact)

The Project site is in the South Coast Air Basin (SCAB). The Federal Clean Air Act (1977 Amendments) required that designated agencies in any area of the nation not meeting national clean air standards must prepare a plan demonstrating the steps that would bring the area into compliance with all national standards. The SCAB could not meet the deadlines for ozone, nitrogen dioxide, carbon monoxide, or PM₁₀. In the SCAB, the agencies designated by the governor to develop regional air quality plans are the SCAQMD and the Southern California Association of Governments (SCAG). The two agencies first adopted an Air Quality Management Plan (AQMP) in 1979 and revised it several times, because earlier attainment forecasts were shown to be overly optimistic.

The 1990 Clean Air Act Amendment (CAAA) required that all states with airsheds with “serious” or worse ozone problems submit a revision to the State Implementation Plan (SIP). Amendments to the SIP have been proposed, revised, and approved over the past decade.

On December 2, 2022, the South Coast Air Quality Management District (SCAQMD) adopted the 2022 Air Quality Management Plan (AQMP), which provides the blueprint for how the Basin will meet the 2015 8-Hour Ozone Standard by 2037. While the 2022 AQMP fulfilled Clean Air Act requirements for “extreme” nonattainment areas, it did not formally address contingency measure requirements as U.S. EPA was in the process of developing updated contingency measure guidance. The 2022 AQMP committed to address these requirements once new guidance was issued. On December 3, 2024, the U.S. EPA released updated guidance for contingency measures. The South Coast Air Basin Contingency Measure SIP Revision for the 2015 8-Hour Ozone Standard has been developed in response to U.S. EPA’s new guidance to satisfy contingency measure requirements in the Basin (SCAQMD 2025).

The current attainment deadlines for all federal non-attainment pollutants are provided in Table 3-2.

Table 3-2 Attainment Deadlines for Federal Non-Attainment Pollutants

Standard	Concentration	Classification	Latest Attainment Year
2008 8-hour Ozone	75 ppb	Extreme	2031
2015 8-hour Ozone	70 ppb	Extreme	2037
1997 8-hour Ozone	80 ppb	Extreme	2023
1997 1-hour Ozone	120 ppb	Extreme	2022
2012 Annual PM _{2.5}	12 µg/m ³	Serious	2030
2006 24-hour PM _{2.5}	35 µg/m ³	Serious	2023

Source: SCAQMD Final 2022 AQMP, December 2022; South Coast Air Basin Contingency Measure SIP Revisions for the 2015 8-Hour Ozone Standard, May 20, 2025; South Coast Air Basin Attainment Plan for the 2012 Annual PM_{2.5} Standard, June 7, 2024.

The proposed Project relates to the AQMP in that the project would generate clean electrical power, which would provide additional emission reductions associated with current power generation. Both the construction and operational emissions would be below the SCAQMD air quality thresholds. As such, the Project will not conflict with or obstruct implementation of the South Coast Air Basin’s AQMP. Therefore, the impacts to implementation of applicable air quality plans would be less than significant.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (Less Than Significant Impact with Mitigation Incorporated)

The SCAQMD has established CEQA threshold to assess the impacts of a project on air quality within the South Coast Air Basin (SCAB). These SCAQMD thresholds have been used to assess the significance of the air quality impacts associated with the proposed Project.

Construction Activity Impacts

CalEEMod was used to estimate the construction emission for the proposed Project. The CalEEMod output files are provided in Appendix E. Table 3-3 provides a summary of the peak day criteria pollutant construction emissions for each phase of the project. None of the construction emissions would exceed the SCAQMD CEQA construction thresholds, or the localized thresholds. Therefore, construction impact to criteria pollutant air quality would be less than significant.

Table 3-3 Peak Day Construction Emissions by Phase

Construction Phase	Peak Day Emissions, lbs/day					
	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Site Preparation	1.02	7.49	8.98	0.03	9.19	3.99
Support Pile Installation	0.45	3.93	5.26	0.03	3.48	0.51
Solar PV System, Equipment, and Conduit Installation	0.63	5.24	6.97	0.03	3.56	0.56
Testing and Commissioning	0.04	0.25	0.49	0.01	0.18	0.05
Max Peak Day	1.02	7.49	8.98	0.03	9.19	3.99
SCAQMD CEQA Thresholds	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Thresholds (lbs/day) ¹		197	1,711		14	9
Exceed Localized Thresholds?		No	No		No	No

1. Localized Thresholds based upon SCAQMD Lookup Tables, for North Coastal Orange County, 5- acre site, 25 meters to receptor. Localized emissions thresholds do not include mobile emissions.
2. Construction emission estimates calculated using CalEEMod Version 2022.1.1.29.
3. See Appendix E for CalEEMod output files.

Operational Impacts

The sources of operational emissions would be associated with the eight trips per year that would be needed to service the solar facility. Five of these trips would be for general maintenance, two would be for vegetation mowing, and one would be for panel washing. Operation of the solar panels would not generate any air emissions. Table 3-4 provides peak day operational emissions. None of the operational emissions would exceed the SCAQMD CEQA operational thresholds, or the localized thresholds. Operation of the solar facility would not generate any air toxic emissions. Therefore, operational impact to criteria pollutant air quality would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations? (Less Than Significant Impact)

See response to Item (b) above and recommended mitigation (see below) in compliance with the SCAQMD for short-term construction related impacts. Based upon the analysis presented for Item 3(b) above, the proposed Project's impacts on sensitive receptor would be less than significant.

Table 3-4 Operational Criteria Pollutant Emissions

Source	Peak Day Emissions, lbs/day					
	VOC	NOx	CO	SO ₂	PM ₁₀	PM _{2.5}
Offsite Mobile Sources	0.12	0.04	2.52	0.00	0.04	0.01
Vegetation Mowing	0.10	0.03	2.36	0.01	0.01	0.01
Totals	0.22	0.07	4.88	0.01	0.05	0.02
SCAQMD CEQA Thresholds	55	55	55	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Localized Thresholds (lbs/day) ¹		197	1,711		4	2
Exceed Localized Thresholds?		No	No		No	No

1. Localized Thresholds based upon SCAQMD Lookup Tables, for North Coastal Orange County, 5- acre site, 25 meters to receptor. Localized emissions thresholds do not include mobile emissions.
2. Construction emission estimates calculated using CalEEMod Version 2022.1.1.29.
3. See Appendix E for CalEEMod output files.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Less Than Significant Impact)

The only odor-causing emissions that might occur would be from construction equipment and would likely be associated with diesel exhaust. This would be temporary in nature and would cease once construction is complete. The limited amount and size of the construction equipment would not typically be considered to emit significant odors. The nearest residential home to the proposed Project site is about 480 feet, which would also serve to limit exposure to any construction equipment odors. Also, construction of the project would have to comply with SCAQMD Rules regarding odors and emissions from construction equipment and should result in less than significant impacts.

Avoidance, Minimization and/or Mitigation Measures

Mitigation Measure AQ-1: Short-Term Construction Emission Reduction Measures – During construction activities, the contractor shall ensure that measures are complied with to reduce short-term (construction) air quality impacts associated with the Project: a) controlling fugitive dust by regular watering or other dust palliative measures (such as covering stock piles with tarps) to meet South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust); b) maintaining equipment engines in proper tune and use Tier-4-rated heavy equipment; c) enforce 5-minute idling limits for both on-road trucks and off-road equipment; and d) sweep streets daily if visible soil material is carried out from construction site.

3.4.4 Biological Resources

Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>