

10.0 UNAVOIDABLE ADVERSE IMPACTS

Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR):

“Describe any significant impacts, including those which can be mitigated, but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.”

Section 5.0 (Existing Conditions, Impacts, Mitigation Measures and Level of Significance After Mitigation) of this Draft EIR documents the analysis of the potentially significant adverse impacts associated with the proposed project. As discussed in Section 5.0, the proposed project would result in unavoidable adverse impacts related to air quality.

10.1 AIR QUALITY

As described in Section 5.2 (Air Quality) of this Draft EIR, the South Coast Air Quality Management District (SCAQMD)'s localized significant thresholds (LSTs) for respirable particulate matter with a diameter of 10 micrometers or less (PM₁₀) and the fine particulate matter with a diameter of 2.5 micrometers or less (PM_{2.5}) would be exceeded during project construction of the Trail and Trail Amenities. Those areas of the project site include sensitive receptors within 25 meters of construction activity, and the emissions associated with on-site construction equipment and fugitive dust emissions would exceed the LSTs. Construction emissions would violate an ambient air quality standard or contribute substantially to an existing violation. Therefore, construction impacts related to violation of an ambient air quality standard would be significant. Also, because the proposed project would exceed the SCAQMD project-level air quality significance thresholds for PM₁₀ and PM_{2.5} emissions, the proposed unhealthful pollutant concentrations could be generated. Therefore, the proposed project could expose sensitive receptors to substantial construction pollutant concentrations. This impact would be significant. In addition, because the proposed project would exceed the SCAQMD project-level air quality significance thresholds for PM₁₀ and PM_{2.5} emissions, would have a cumulatively considerable contribution to the region's air quality. Therefore, the cumulative impact would be significant.

It is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for fugitive dust. Rule 403 fugitive dust control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, re-establishing ground cover as quickly as possible after ground disturbance, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site, and maintaining effective cover over exposed areas. However, compliance with Rule 403 will not ensure that localized PM₁₀ and PM_{2.5} impacts would be reduced to a less than significant level. There are no additional feasible mitigation measures to reduce localized PM₁₀ and PM_{2.5} emissions. Therefore, the proposed project would violate an ambient air quality standard or contribute substantially to an existing violation, result in a cumulatively considerable net increase of criteria pollutants, and expose sensitive receptors to substantial construction pollutant concentrations. These impacts would be significant and unavoidable.