# 5.3 Air Quality

# 5.3.1 Environmental Setting

Shasta County is part of the Sacramento Valley Air Basin (SVAB). The SVAB also includes Tehama, Glenn, Butte, Colusa, Sutter, Yuba, and Sacramento Counties, as well as the Placer County Air Pollution Control District portion of Placer County, and the Yolo-Solano Air Quality Management District portion of Solano County.

# Climate and Meteorology

The overall climate in the SVAB is dry and warm, with the majority of precipitation occurring in the winter months. The Western Regional Climate Center recorded seasonal climatic data from 1986 to 2016 at the Redding Municipal Airport, located to the east of the proposed project area. The average annual maximum temperature within the proposed project area is 75.5 degrees Fahrenheit (°F), with July having the hottest average maximum temperature, at 98.7°F. The average annual minimum temperature within the proposed project area is 49.4°F, with December having the coldest average temperature, at 36.1°F. The region receives approximately half of its annual precipitation (33.68 inches) during the months of December, January, and February (WRCC 2016).

## **Ambient Air Quality**

The U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established ambient air quality standards for several pollutants based on their adverse health effects. The EPA has set National Ambient Air Quality Standards (NAAQS) for ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particulate matter less than 10 microns (PM<sub>10</sub>), fine particulate matter less than 2.5 microns (PM<sub>2.5</sub>), sulfur dioxide (SO<sub>2</sub>), and lead (Pb). These pollutants are commonly referred to as "criteria pollutants." Primary standards were set to protect public health; secondary standards were set to protect public welfare against visibility impairment, damage to animals, crops, vegetation, and buildings. In addition, CARB has established California Ambient Air Quality Standards (CAAQS) for these pollutants, as well as for sulfate (SO<sub>4</sub>), visibility reducing particles, hydrogen sulfide (H<sub>2</sub>S), and vinyl chloride. California standards are generally stricter than national standards.

The status of a given air basin with regard to NAAQS or CAAQS requirements is defined it terms of level of "attainment." Air basins or areas within an air basin not meeting these standards are classified as being in "nonattainment." Table 5.3-1 summarizes the federal and state attainment status for the SVAB, as of 2016, based on the NAAQS and CAAQS, respectively.

#### **Toxic Air Contaminants**

Air pollutants originating from numerous sources that may pose a substantial health risk in California are called toxic air contaminants (TACs) under California law (Health and Safety Code §§ 39650 et seq.). The substances that have been determined by CARB to be toxic air contaminants are identified in the California Code of Regulations, Title 17, § 93000. TACs include asbestos, chemical compounds, and certain metals. Direct exposure to these pollutants has been shown to cause cancer, birth defects, damage to brain and nervous system, and respiratory disorders. Since no safe levels of TACs can be determined, there are no air quality standards for TACs. Instead, TAC impacts are evaluated by calculating the health risks associated with exposure to a given contaminant. The requirements of the Air Toxic "Hot Spots" Information and Assessment Act apply to facilities that use, produce, or emit toxic chemicals.

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Table 5.3-1 National and California Ambient Air Quality Standards

|   | Averaging  | California                        | National Sta                                | Attainment<br>Status     |                   |         |
|---|--|-----------------------------------|---|--------------------------|-------------------|---------|
| Pollutant   | Time   | Standards(1),(2)                  | Primary <sup>(4)</sup>                      | Secondary <sup>(5)</sup> | State             | Federal |
| Ozono (O.)  | 1-Hour   | 0.09 ppm (180 µg/m³)              | (6)   |                          | N                 | U/A     |
| Ozone (O <sub>3</sub> )                               | 8-Hour   | 0.07 ppm (137 μg/m <sup>3</sup> ) | 0.07 ppm (137 μg/m³) 0.07 ppm (137 μg/m³)   |                          |                   |         |
| Carbon monoxide                                       | 1-Hour   | 20 ppm (23 mg/m³)                 | 0 ppm (23 mg/m³) 35 ppm (40 mg/m³)          |                          | U                 | U/A     |
| (CO)  | 8-Hour   | 9.0 ppm (10 mg/m <sup>3</sup> )   | 9 ppm (10 mg/m³)                            |                          |                   |         |
| Nitrogon diovido                                      | 1-Hour   | 0.18 ppm (339 μg/m <sup>3</sup> ) | 0.1 ppm (188 μg/m <sup>3</sup> )            |                          |                   |         |
| Nitrogen dioxide<br>(NO <sub>2</sub> )                | 1-Year   | 0.03 ppm (57 μg/m³)               | 0.053 ppm (100 μg/m³) 0.053 ppm (100 μg/m³) |                          | A                 | U/A     |
|   | 1-Hour   | 0.25 ppm (655 μg/m <sup>3</sup> ) | 0.075 ppm (196 µg/m <sup>3</sup> )          |                          |                   |         |
| Sulfur dioxide (SO <sub>2</sub> ) <sup>(7)</sup>      | 3-Hour   |                                   |   | 0.5 ppm (1,300<br>μg/m³) |                   | U       |
|   | 24-Hour  | 0.04 ppm (105 μg/m <sup>3</sup> ) | g/m³)                                       |                          |                   |         |
| Respirable  | 24-Hour  | 50 μg/m <sup>3</sup>              | 150 μg/m <sup>3</sup>                       | 150 μg/m <sup>3</sup>    | N                 |         |
| Particulate Matter (PM <sub>10</sub> ) <sup>(8)</sup> | 1-Year   | 20 μg/m <sup>3</sup>              |   |                          |                   | U       |
| Fine Particulate                                      | 24-Hour  |                                   | 35 μg/m³                                    | 35 μg/m³                 | Δ.                | U/A     |
| Matter (PM <sub>2.5</sub> ) <sup>(8)</sup>            | 1-Year   | 12 μg/m <sup>3</sup>              | 12.0 μg/m <sup>3</sup>                      | 15 μg/m³                 | А                 |         |
|   | 30-Day   | 1.5 μg/m <sup>3</sup>             |   |                          |                   | U/A     |
| Lead (Pb)   | Rolling<br>3-Month   |                                   | 0.15 μg/m <sup>3</sup>                      | 0.15 μg/m <sup>3</sup>   | Α                 |         |
| Hydrogen sulfide (H <sub>2</sub> S)                   | 1-Hour   | 0.03 ppm (42 µg/m³)               | '   |                          | U                 | n/a     |
| Sulfates (SO <sub>4</sub> )                           | D <sub>4</sub> ) 24-Hour 25 μg/m <sup>3</sup> No Federal Standards |                                   | Standards                                   | Α                        | n/a               |         |
| Visibility reducing particles                         | 8-Hour   | See Note 9                        | No rederal                                  | U                        | n/a               |         |
| Vinyl chloride <sup>(10)</sup>                        | inyl chloride <sup>(10)</sup> 24-Hour 0.01 ppm (26 μg/m³)          |                                   |   |                          | U <sup>(11)</sup> | n/a     |

Source: CARB 2017a, 2017b, 2016

Notes:

<sup>(1)</sup> CAAQS for ozone, CO (except 8-hour Lake Tahoe), SO<sub>2</sub> (1- and 24-hour), NO<sub>2</sub>, PM<sub>10</sub>, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded.

<sup>(2)</sup> Concentration expressed first in units in which it was promulgated. Parts per million in this table refers to ppm by volume or micromoles of pollutant per mole of gas.

<sup>(3)</sup> NAAQS (other than ozone, particulate matter, and standards based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth-highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is not to be exceeded more than once per year. The 24-hour standard is attained when the 3-year average of the weighted annual mean at each monitor within an area does not exceed 150 μg/m³. For PM₂₅, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, do not exceed 35 μg/m³. The annual standard is attained when the 3-year average of the weighted annual mean at single or multiple community-oriented monitors does not exceed 12 μg/m³.

<sup>(4)</sup> National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

<sup>(5)</sup> National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse impacts of a pollutant.

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

- (6) The federal 1-hour ozone standard was revoked for most areas of the United States, including all of California on June 15, 2005.
- (7) Final rule signed June 2, 2010. The 1971 annual and 24-hour SO<sub>2</sub> standards were revoked in that same rulemaking.
- (8) On December 14, 2012, the national annual PM<sub>2.5</sub> primary standard was lowered from 15 μg/m³ to 12 μg/m³. Existing national 24-hour PM<sub>2.5</sub> standards (primary and secondary) were retained at 35 μg/m³, as was the annual secondary standard of 15 μg/m³. The existing 24-hour PM<sub>10</sub> standards (primary and secondary) of 150 μg/m³also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- (9) In 1989, CARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.
- (10) CARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health impacts determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- (11) Attainment status was not identified.

Key:

A attainment

CAAQS California Ambient Air Quality Standards

CARB California Air Resources Board

CO carbon monoxide mg/m³ milligrams per cubic meter

N nonattainment n/a not applicable

NAAQS National Ambient Air Quality Standards

NO<sub>2</sub> nitrogen dioxide

 $PM_{10}$  particulate matter less than 10 microns in diameter  $PM_{2.5}$  particulate matter less than 2.5 microns in diameter

ppm parts per million SO<sub>2</sub> sulfur dioxide U unclassified

µg/m<sup>3</sup> micrograms per cubic meter

## **Sensitive Receptors**

Sensitive receptors are areas occupied by individuals or other organisms that are more susceptible to the adverse effects of exposure to air pollutants. The most common sensitive receptors are residences, apartments, hospitals, schools, daycare facilities, elderly housing facilities, and convalescent facilities. These receptors may have an increased sensitivity to contaminants because of the age and health of their occupants or because of their proximity and increased exposure to the contamination source. The Air Quality and Land Use Handbook indicates several source categories that have the potential to cause long-term public health risk impacts due to proximity sensitivity and duration of exposure at a receptor (CARB 2005). The proposed project would not entail a use or activity considered to cause potential health risks listed by the 2005 handbook. However, the handbook recommends that sensitive receptors should be located farther than 1,000 feet from a distribution center where trucks, trailers, shipping containers, and other equipment with diesel engines produce diesel particulate matter emissions. Since emissions from the proposed project would involve exhaust gases and fugitive particulate matter generated by mobile sources during construction, the sensitive receptors located within 1,000 feet of the proposed project were considered in the impact assessment.

Existing uses within proximity to the proposed project area primarily include agriculture (i.e., row crops and orchards) and rural residential. Sensitive receptors within 1,000 feet of the proposed project alignment include single-family residences and three schools. The nearest residence is located 48.2 feet and the nearest school 261.6 feet from the proposed underground fiber optic telecommunications cable (telecom line) route, as described in Section 5.12, "Noise." There are no hospitals, or other sensitive land uses within 1,000 feet of the proposed project area.

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# 5.3.2 Regulatory Setting

## Federal

**Clean Air Act.** The Clean Air Act (CAA; United States Code Title 42, Chapter 85) is the law that defines the EPA's responsibilities for protecting and improving the nation's air quality and the stratospheric

ozone layer. The last major change in the law, the CAA Amendments of 1990, was enacted by Congress in 1990.

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Title I of the CAA requires establishment of NAAQS, air quality designations, and plan requirements for nonattainment areas. Table 5.3-1 summarizes the federal and state attainment status for Shasta County as of 2016, as well as current NAAQS and CAAQS. States are required to submit a state implementation plan (SIP) to the EPA for areas in nonattainment for NAAQS; the SVAB is in attainment for pollutants under the CAA; therefore, no SIP applies to the proposed project.

Title II of the CAA contains a number of provisions regarding mobile sources, including requirements for reformulated gasoline, new tailpipe emission standards for cars and trucks, standards for heavy-duty vehicles, and a program for cleaner fleet vehicles.

#### State

California Clean Air Act. The California Clean Air Act of 1988 outlines a statewide air pollution control program in California. CARB is the primary administrator of the California Clean Air Act, while local air quality districts administer air rules and regulations at the regional level. CARB is responsible for establishing the CAAQS, maintaining oversight authority in air quality planning, developing programs for reducing emissions from motor vehicles, developing air emission inventories, collecting air quality and meteorological data, and preparing the SIP. The CAAQS apply to the same criteria pollutants as the federal CAA and also include SO<sub>4</sub>, visibility reducing particulates, H<sub>2</sub>S, and vinyl chloride. They are generally more stringent than the federal standards. The CAAQS are presented in Table 5.3-1. CARB is also responsible for regulations pertaining to TACs. The Air Toxics "Hot Spots" Information and Assessment Act was enacted as a means to establish a formal air toxics emission inventory risk quantification program. The Air Toxics Hot Spots Information and Assessment Act (Assembly Bill 2588, enacted 1987), as amended, establishes reporting requirements related to the type and quantity certain emissions from stationary sources.

#### Local

The Shasta County AQMD has adopted air quality thresholds for ozone precursors (NO<sub>2</sub>, reactive organic gases [ROG]) and for PM<sub>10</sub> (Table 5.3-2). These thresholds are published in the Shasta County General Plan and are recommended to be applied during the Shasta County Planning Division's CEQA review process, since they address pollutants of concern identified in the AQAP. Thresholds for other criteria pollutants do not appear in the General Plan, but are included in Shasta County AQMD Rule 2:1, New Source Review. Standard mitigation measures and best available mitigation measures, as identified by Shasta County AQMD would be required for any project exceeding level "A" thresholds. Projects exceeding level "B" thresholds would be required to apply feasible mitigation measures in addition to standard measures.

Table 5.3-2 Shasta County AQMD Air Quality Emission Thresholds

| Pollutant                           | "A" Threshold (lbs/day) | "B" Threshold (lbs/day) |  |  |  |
|-------------------------------------|-------------------------|-------------------------|--|--|--|
| Nitrogen dioxide (NO <sub>2</sub> ) | 25                      | 137                     |  |  |  |
| Reactive organic gas (ROG)          | 25                      | 137                     |  |  |  |
| PM <sub>10</sub>                    | 80                      | 137                     |  |  |  |
| Sulfur dioxide (SO <sub>2)</sub>    | 80                      | None                    |  |  |  |
| Carbon monoxide (CO)                | 500                     | None                    |  |  |  |

Source: Shasta County 2004; Shasta County AQMD 1997

Note: Thresholds for CO and SO2 do not appear in Table AQ-4 of the Shasta County General Plan, but are included in SCAQMD policy (Rule 2:1).

Key:

PM<sub>10</sub> particulate matter less than 10 microns in diameter lbs pounds

SCAQMD Shasta County Air Quality Management District

All construction activities must be in compliance with Shasta County AQMD Rule 3:16 in an effort to attain state and national  $PM_{10}$  ambient air quality standards. Projects are required to utilize one or more reasonably available control measures to minimize fugitive dust emissions. Control measures include the following:

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- Wind breaks/screens
- Dust suppressants
- Haul truck materials covered or watered
- Haul truck wheel washers
  - Street sweeping

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# **5.3.3 Environmental Impacts and Mitigation Measures**

The impact analysis below identifies and describes the proposed project's potential impacts on the air basin. Potential impacts were evaluated according to significance criteria based on the checklist items presented in Appendix G of the CEQA Guidelines and listed at the start of each impact analysis section below. The standards used to evaluate the significance of impacts are often qualitative rather than quantitative because appropriate quantitative standards are either not available for many types of impacts, or are not applicable for some types of projects. Both the construction and maintenance/operations phases were considered; however, because the construction phase could result in physical changes to the environment, analysis of construction phase effects warranted a more detailed evaluation. Air quality impacts anticipated to occur from operation of the proposed project would be negligible, and emissions from this phase would result from occasional truck trips for maintenance, connecting or disconnecting customers, and inspecting or potentially repairing equipment. Emissions from these vehicle trips would represent an insignificant portion of daily mobile source emissions in the air basin.

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## **Applicant Proposed Measures**

The applicant would implement the following APMs to minimize or avoid impacts on air quality. Mitigation Measure (MM) GEN-1 requires implementation of all APMs, including those identified to minimize impacts on air quality resources. A list of all project APMs is included in Table 4-2 in Chapter 4.

**APM AQ-1:** TDS will require all construction contractors to implement the following measures for fugitive Particulate Matter (PM) less than 10 microns in diameter (PM<sub>10</sub>) control during construction:

• All disturbed areas, including bulk material storage that is not being actively utilized, shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover.

All on- and off-site unpaved roads will be effectively stabilized, and visible
emissions shall be limited to no greater than 20 percent opacity for dust emissions by
non-toxic chemical stabilizers, dust suppressants, and/or watering.

• All track-out and carry-out will be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 15 linear m (50 linear feet) or more onto a paved road within an urban area.

• Bulk material shall be stabilized prior to movement or at points of transfer with the application of sufficient water, the application of chemical stabilizers, or by sheltering or enclosing the operation and transfer line.

• Vehicle speed for all construction vehicles shall not exceed 24.1 km (15.0 miles) per hour on any unpaved surface at the construction site.

# Significance Criteria

Table 5.3-3 describes the significance criteria from Appendix G of the CEQA Guidelines' air quality section, which the California Public Utilities Commission used to evaluate the environmental impacts of the proposed project.

Table 5.3-3 Air Quality Checklist

| Wo | ould the project:  | Potentially<br>Significant<br>Impact | Less Than Significant with Mitigation Incorporation | Less Than<br>Significant<br>Impact | No<br>Impact |
|----|--|--------------------------------------|---|------------------------------------|--------------|
| a. | Conflict with or obstruct implementation of the applicable air quality plan?   |                                      |   |                                    |              |
| b. | Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? |                                      |   |                                    |              |
| C. | Expose sensitive receptors to substantial pollutant concentrations?  |                                      |   | $\boxtimes$                        |              |
| d. | Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?  |                                      |   | $\boxtimes$                        |              |

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

As discussed in Section 5.3.2, the Shasta County AQMD has set significance thresholds for criteria pollutants NO<sub>2</sub>, ROG, and PM<sub>10</sub> in Shasta County to assess whether a project complies with the Shasta County AQAP (Shasta County 2004). Projects that have implemented mitigation measures as determined by the Shasta County Planning Division can proceed with an environmental determination of a Mitigated Negative Declaration if emissions do not exceed "B" thresholds of significance. Thus, projects with emissions below the "B" threshold of significance for criteria pollutants would not conflict or obstruct implementation of the Shasta County AQMD's air quality plan. Therefore, the "B" thresholds of significance for air quality were used to assess whether the proposed project would conflict with the Shasta County AQMD's air quality plan.

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Emissions of criteria pollutants would result from vehicle and equipment exhaust, as well as fugitive dust from travel, earthmoving, and site grading during construction of the proposed project. Plowed and trenched installation for the underground telecom line would involve ground-disturbing activities that would generate fugitive dust. Construction emissions estimates, along with the thresholds of significance for criteria pollutants emitted during construction, are provided in Table 5.3-4. Detailed calculations are provided in Appendix C.

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Table 5.3-4 Estimate Daily Construction Emissions

| Construction                         | Criteria Pollutant Emissions (lbs/day) |                 |       |                 |                  |         |                   |         |
|--------------------------------------|--|-----------------|-------|-----------------|------------------|---------|-------------------|---------|
| Phase                                | ROG                                    | NO <sub>2</sub> | СО    | SO <sub>2</sub> | PM <sub>10</sub> |         | PM <sub>2.5</sub> |         |
| i iiase                              |  |                 |       |                 | Fugitive         | Exhaust | Fugitive          | Exhaust |
| Plowed/trenched conduit installation | 2.32                                   | 19.95           | 11.51 | 0.02            | 0.11             | 1.46    | 0.03              | 1.35    |
| Bored conduit installation           | 3.02                                   | 26.40           | 21.65 | 0.04            | 0.15             | 1.65    | 0.04              | 1.60    |
| Node installation                    | 0.43                                   | 4.04            | 3.33  | 0.01            | 0.09             | 0.26    | 0.03              | 0.24    |
| Maximum daily emissions              | 3.02                                   | 26.40           | 21.65 | 0.03            | 1.80             |         | 1.64              |         |
| SCAQMD "A"<br>Thresholds             | 25                                     | 25              | 500   | 80              | 80               |         | 80                |         |
| SCAQMD "B"<br>Thresholds             | 137                                    | 137             | None  | None            | 137 None         |         | one               |         |
| Exceeds SCAQMD "A" Threshold?        | No                                     | Yes             | N/A   | N/A             | No               |         | N/A               |         |
| Exceeds SCAQMD "B" Threshold?        | No                                     | No              | N/A   | N/A             | No N/A           |         | /A                |         |

Source: Shasta County 2004

Key:

CO carbon monoxide

lbs pounds N/A Not applicable NO<sub>2</sub> nitrogen dioxide

PM<sub>10</sub> particulate matter less than 10 microns in diameter PM<sub>2.5</sub> particulate matter less than 2.5 microns in diameter

ROG reactive organic gases

SCAQMD Shasta County Air Quality Management District

SO<sub>2</sub> sulfur dioxide

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- 1 The construction emissions reported in Table 5.3-4 are all below the "B" thresholds of significance. 2 Although the proposed project's anticipated construction emissions are below the designated thresholds,
- 3 the applicant would implement APM AQ-1 to further minimize generation of fugitive dust and is
- 4 consistent with Shasta County AQMD Rule 3:16. Further, the proposed project would be required to
- 5 implement standard mitigation measures as determined by the Shasta County Planning Division. Standard 6
  - mitigation measures typically required by the county include watering and limiting vehicle speeds on unpaved roads, sweeping of adjacent paved roads, limiting excavation and clearing activities during high

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- winds, and limiting construction activities that require traffic control. The proposed project would not conflict with or obstruct implementation of the applicable air quality plan. The impact of the proposed
- project on air quality would be less than significant.

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### Significance: Less than significant.

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

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As identified in Table 5.3-1, the proposed project area is in nonattainment of CAAOS for O<sub>3</sub> and PM<sub>10</sub>, but is in attainment for all NAAQS criteria pollutants. As discussed for significance criteria (a), impacts would be less than significant for ROG and NO<sub>2</sub> (ozone precursors), and for PM<sub>10</sub>. Additionally, the proposed project would be required to implement standard mitigation measures as determined by the Shasta County Planning Division. Construction of the proposed project would therefore not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment.

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

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## Significance: Less than significant.

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are limited to single-family residences and three elementary schools. During construction of the proposed project, sensitive receptors near the construction sites would be exposed to particulate emissions from diesel-fueled engines. Diesel exhaust is considered carcinogenic, and long-term exposure could result in adverse health impacts. Construction would be temporary and limited to daylight hours during the 60-120 day construction period. Construction vehicles and equipment would not remain in any one location for a prolonged period of time and would be relocated as sections of the telecom line are installed. A single plow and trenching crew typically installs 1,000 feet of conduit per day. Digital Loop Carrier Site installation would last approximately five days per site. Implementation of APM AQ-1 would further

Sensitive receptors within 1,000 feet in either direction of the proposed underground telecom line route

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minimize generation of fugitive dust near sensitive receptors. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations during construction. Impacts would be less than significant.

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#### Significance: Less than significant.

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

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During construction, potential sources of odors would be represented by diesel exhaust and hydrocarbon emissions from construction vehicles and equipment use, as well as roadway resurfacing. As described under criterion (c), construction would be temporary, and construction equipment and vehicles would move as sections of the telecom line are installed. The area is rural with low density residential and agriculture; some sections along the proposed route are sparsely populated. Therefore, emissions from

construction activities that lead to odors are not expected to affect a substantial number of people and would not result in a significant impact. Impacts would be less than significant.

Significance: Less than significant.

# Mitigation Measures

Because all air quality impacts for the proposed project would be less than significant, no mitigation measures are required. However, as described in Chapter 4, Project Description, Mitigation Measure (MM) GEN-1 requires implementation of all APMs.

 MM GEN-1: Implementation of All APMs. The applicant shall implement all APMs as stated in this environmental document, except in cases where they are superseded by mitigation measures, and the physical and operational components of the project will not exceed the limits of Shasta County roads, roadways, and right-of-ways. The APMs shall be incorporated into the Mitigation, Monitoring, and Reporting Plan.

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