SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Attachment 3 to the Resolution for 2003 Air Quality Management Plan

Statement of Findings, Statement of Overriding Considerations and Mitigation Monitoring Plan

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INTRODUCTION

The California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., requires that the potential environmental impacts of proposed projects be evaluated and that feasible methods to reduce or avoid identified significant adverse environmental impacts of these projects be identified. To fulfill the purpose and intent of CEQA, the SCAQMD has prepared a Program Environmental Impact Report (PEIR) to address the potential environmental impacts associated with the proposed 2003 Air Quality Management Plan (AQMP). The South Coast Air Quality Management District (SCAQMD) is the lead agency for the proposed project and, therefore, has prepared a PEIR pursuant to CEQA. The purpose of the PEIR is to describe the proposed project and to identify, analyze, and evaluate any potentially significant adverse environmental impacts that may result from adopting and implementing the proposed 2003 AQMP. The Draft PEIR was circulated to the public for a 45-day review and comment period from April 8, 2003, to May 22, 2003. The SCAQMD received 15 comment letters during the 45-day public review and comment period. Responses to all comments were prepared and comments and responses are included in the Final PEIR.

BACKGROUND

The California Legislature adopted the Lewis Air Quality Act in 1976, creating the SCAQMD from a voluntary association of air pollution control agencies in Los Angeles, Orange, Riverside, and San Bernardino counties. The new agency was charged with developing uniform plans and programs for the South Coast Air Basin (Basin) to attain federal ambient air quality standards by the dates specified in federal law. While the Basin has one of the worst air quality problems in the nation, there have been significant improvements in air quality in the Basin over the last two decades, although some air quality standards are still exceeded relatively frequently and by a wide margin. The SCAQMD is also required to meet state standards by the earliest date practicable through the use of reasonably available control measures.

The Lewis Air Quality Act (now known as the Lewis-Presley Air Quality Management Act) requires the SCAQMD to prepare an AQMP consistent with federal planning requirements. In 1977, amendments to the federal Clean Air Act (CAA) included requirements for submitting State Implementation Plans (SIPs) for non-attainment areas that have not attained all federal ambient air quality standards (Health & Safety Code §40462). The federal CAA was amended in 1990 to specify attainment dates and SIP requirements for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2) and PM10. The California Clean Air Act (CCAA), adopted in 1988, requires the SCAQMD to endeavor to achieve and maintain state ambient air quality standards for ozone, CO, sulfur dioxide (SO_2), and NO_2 by the earliest practicable date (Health & Safety Code §40910). The CCAA requires a three-year plan review and update to the AQMP.

SUMMARY OF THE PROPOSED PROJECT

The purpose of the 2003 AQMP is to establish a comprehensive program to attain and maintain all state and federal ambient air quality standards through implementation of different categories of control measures. To achieve emission reductions necessary to meet state and federal ambient air quality standards, the 2003 AQMP also relies on advances in technology that are reasonably expected to be available by the year 2010. Based upon the modeling analyses described in Subsection 4.1.5 of the 2003 AQMP PEIR, implementing all control measures contained in the 2003 AQMP is anticipated to bring the district into attainment for all pollutants, except for the state ozone and PM10 air quality standards, by the year 2010 (see 2003 PEIR Table 4.1-2).

POTENTIAL SIGNIFICANT ADVERSE IMPACTS THAT CANNOT BE MITIGATED BELOW A SIGNIFICANT LEVEL

The Notice of Preparation/Initial Study (NOP/IS) identified potentially adverse environmental impacts from implementing the 2003 AQMP in the following environmental areas: secondary air quality impacts, energy impacts, hazards impacts, hydrology and water quality impacts, and solid/hazardous waste impacts. Impacts to these environmental topics were comprehensively analyzed further in the Draft PEIR. Based on the analysis in the Draft PEIR, the following impacts have been identified as potentially significant adverse impacts that cannot be reduced below significance.

1. Secondary Emissions from Miscellaneous Sources were determined to be significant due to a potential increase in NOx emissions from trucks hauling manure out of the district.

2. Significant adverse secondary air quality impacts associated with the control of mobile sources could be generated related to the manufacture of clean fuels in two areas. The first area is operational air quality impacts at local refineries resulting from modifications of existing equipment or installation of new equipment that would be necessary to manufacture clean fuels. The second source of emissions related to the production of clean fuels is emissions from marine vessels and trains importing oxygenates and other refinery feedstocks into the district. Because marine vessels and trains are under the jurisdictional authority of U. S. EPA and, for some categories of marine vessels, CARB, the SCAQMD is pre-empted from regulating emissions from these sources at this time.

3. Implementing the draft 2003 AQMP control measures would contribute construction emissions to the district-wide construction inventory. Since the 2003 AQMP emission inventory shows that construction PM10 emissions are expected to increase by the year 2010 and implementing AQMP control measures is expected to contribute to construction PM10 emissions, the estimated PM10 emissions associated with construction activities are expected to exceed the SCAQMD daily PM10 significance threshold and are considered potentially significant.

4. Although the specific modifications to the refineries are currently unknown, changes that would require additional fuels to be produced may require refinery modifications that could include the ability to process additional quantities of crude, process more

intermediate streams, and the ability to produce more alkylate (the main blending component of gasoline). Refineries operate at or near capacity on a continuous basis. Therefore, modifications to existing major processing units or the construction of new major processing units at the refineries would be required. Based on the analysis from previous refinery modifications to produce CARB Phase 2 and Phase 3 reformulated gasolines, it is expected that some of these modifications would result in significant hazard impacts, resulting in an increase in exposure to hazardous materials/flammable materials to the surrounding population.

POTENTIAL SIGNIFICANT ADVERSE IMPACTS THAT CAN BE REDUCED BELOW A SIGNIFICANT LEVEL

The following impacts have been identified as potentially significant adverse impacts that can be reduced below a significant level.

1. Implementing the 2003 AQMP may contribute cumulative impacts to new or additional non-criteria pollutant emissions. There is a potential that the exempt compounds may create air quality impacts if the exempt solvents contain toxic compounds that are not regulated by the state and federal toxic air contaminant (TAC) programs or by the SCAQMD's TAC rules. The cumulative impacts associated with TACs are potentially significant, but can be mitigated to insignificance.

2. Some of the control measures could require or encourage the use of selective catalytic reduction (SCR) control equipment which uses ammonia to reduce NOx emissions from the exhaust stream. The use of ammonia in SCRs is considered to be a potentially significant hazard impact due to the inherent risks associated with the use of anhydrous ammonia. Mitigation measures were identified that can reduce potentially significant hazard impacts associated with ammonia to insignificance.

3. The marine vapor recovery control measure may involve collection of emissions at the dispenser and installation of add-on control equipment, e.g., carbon adsorption systems. There is a potential to form an explosive gas mixture when the vapors mix with air. This is a potentially significant hazard concern with boats since the boat hull can collect leaking heavy gasoline vapors. Mitigation measures were identified that can reduce potentially significant hazard impacts associated with installation of add-on control equipment to insignificance.

4. Implementation of the 2003 AQMP could contribute to increased use of electric vehicles. Since some batteries contain toxic materials, water impacts are possible if they are disposed of in an unsafe manner, such as by illegal dumping or by disposal in a landfill. Water quality impacts that could be generated include leaching toxic metals or acids into surface and ground water. Mitigation measures were identified that can reduce potentially significant water quality impacts associated with disposal of spent batteries to insignificance.

5. Illegal or improper disposal of electric batteries could result in significant solid waste impacts by allowing hazardous wastes to be disposed in municipal landfill. Mitigation

measures were identified that can reduce potentially significant solid waste impacts associated with disposal of spent batteries to insignificance.

6. Several control measures could encourage the use of carbon adsorption as air pollution control equipment, increasing the amount of activated carbon required for use. The solid/hazardous waste impacts associated with the use of carbon adsorption are considered insignificant after implementing to measures to mitigate potential impacts.

STATEMENT OF FINDINGS

Public Resources Code §21081 and CEQA Guidelines §15091(a) state, "No public agency shall approve or carry out a project for which an EIR has been completed which identifies one or more significant adverse environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding." Additionally, the findings must be supported by substantial evidence in the record (CEQA Guidelines §15091(b)). As identified in the Final PEIR and summarized above, the proposed project has the potential to create significant adverse air quality, hazard, hydrology/water quality, and solid/hazardous waste impacts. The SCAQMD Governing Board, therefore, makes the following findings regarding the proposed project. The findings are supported by substantial evidence in the record as explained in each finding. This Statement of Findings will be included in the record of project approval and will also be noted in the Notice of Determination. The Findings made by the SCAQMD Governing Board are based on the following significant adverse impacts identified in the PEIR.

Findings for Potentially Significant Adverse Impacts That Cannot Be Mitigated Below a Significant Level

1. Secondary Emissions from Miscellaneous Sources Were Determined to Be Significant Due to An Increase in NOx Emissions from Trucks Hauling Manure Out of the District.

Finding and Explanation: The air quality analysis concludes that the NOx emissions from trucks hauling manure out of the district (Control Measure WST-01, MSC-04 and some long-term control measures) could generate significant adverse impacts. Because haul trucks are not typically owned or operated by the potentially affected facilities, incentive programs to use alternative clean fuels or install controls may reduce NOx emissions from haul trucks to less than significant. However, because incentive programs are voluntary and not under the control of the potentially regulated facilities, permanent NOx emission reductions are not guaranteed.

The Governing Board finds that while feasible mitigation measures have been identified to eliminate or minimize the potentially significant adverse impact to air quality, implementation of those measures are voluntary and, therefore, they are not guaranteed. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and

technological factors" (Public Resources Code §21061.1). Therefore, this impact cannot be reduced below a significant level.

The Governing Board finds further that the Final PEIR considered alternatives pursuant to CEQA Guidelines §15126.6, but no project alternatives would reduce to insignificant levels the significant adverse air quality impacts identified for the proposed project.

2. Significant adverse secondary air quality impacts associated with the control of mobile sources could be generated related to the manufacture of reformulated or clean fuels.

Finding and Explanation: Significant adverse secondary air quality impacts associated with the control of mobile sources could be generated related to the manufacture of reformulated or clean fuels in two areas. The first area is operational air quality impacts at local refineries resulting from modifications of existing equipment or installation of new equipment that would be necessary to manufacture reformulated or other clean fuels.

The second source of emissions related to the production of clean fuels is emissions from marine vessels and trains importing oxygenates and other refinery feedstocks into the district.

The Governing Board finds that while feasible mitigation measures have been identified to eliminate or minimize emissions associated with modifications at refineries, refinery modification projects could still generate emissions that remain significant. Therefore, this impact cannot be reduced below a significant level.

The Governing Board further finds that, because marine vessels and trains are under the jurisdiction authority of U. S. EPA and in some cases CARB, the SCAQMD is pre-empted from regulating emissions from these sources at this time and no additional feasible mitigation measures have been identified. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code §21061.1). Therefore, this impact cannot be reduced below a significant level.

The Governing Board finds further that the Final PEIR considered alternatives pursuant to CEQA Guidelines §15126.6, but no project alternatives would reduce to insignificant levels the significant air quality impacts identified for the proposed project.

3. The estimated PM10 emissions associated with construction activities due to control measures identified in the 2003 AQMP are expected to exceed the SCAQMD daily PM10 significance threshold and are considered potentially significant.

Finding and Explanation: While implementing the 2003 AQMP control measures is expected to reduce operational emissions, construction-related activities associated with installing or replacing equipment, for example, are expected to generate emissions from construction worker vehicles, trucks, and construction equipment. Implementation of some of the measures in the 2003 AQMP will require construction of new infrastructure. The

estimated PM10 emissions associated with construction activities are expected to increase between 2002 and 2010 in an amount that exceeds the SCAQMD's daily PM10 significance thresholds.

The Governing Board finds that feasible mitigation measures have been identified to minimize emissions associated with construction activities, but remaining impacts are expected to continue to exceed the PM10 significance threshold. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code §21061.1). Therefore, this impact cannot be reduced below a significant level.

The Governing Board finds further that the Final PEIR considered alternatives pursuant to CEQA Guidelines §15126.6, but no project alternatives would reduce to insignificant levels the significant air quality impacts identified for the proposed project.

4. Refinery modifications to produce additional quantities of clean fuels and fuel blending components could result in significant hazard impacts.

Finding and Explanation: Although the specific modifications to the refineries are currently unknown, changes that would require that additional fuels be produced would require refinery modifications which could include the ability to process additional quantities of crude, crack more intermediate streams, and the ability to produce more alkylate (the main blending component of gasoline). Refineries operate at or near capacity on a continuous basis. Therefore, modifications to existing major processing units or the construction of new major processing units at the refineries would be required. Based on the analysis from previous refinery modifications to produce CARB Phase 2 and Phase 3, it is expected that some of these modifications would result in significant hazard impacts, resulting in an increase in exposure to hazardous materials/flammable materials to the surrounding population.

The Governing Board finds that feasible mitigation measures have been identified to minimize emissions associated with refinery modifications, but not to insignificance. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code §21061.1). Therefore, this impact cannot be reduced below a significant level.

The Governing Board finds further that the Final PEIR considered alternatives pursuant to CEQA Guidelines §15126.6, but no project alternatives would reduce to insignificant levels the significant hazard impacts identified for the proposed project.

Findings for Potentially Significant Adverse Impacts that Can Be Mitigated Below a Significant Level

1. Control Measures in the 2003 AQMP may result in cumulative impacts associated with non-criteria pollutant emissions.

Finding and Explanation: Increases in the use methylene chloride and perchloroethylene could occur in consumer products because they are specifically exempted from the VOC definition due to their very low ozone-forming capabilities. As a result, some manufacturers may choose to use methylene chloride or perchloroethylene in the reformulations to reduce the VOC content in meeting future limits, thus increasing ambient levels of methylene chloride and perchloroethylene, which are carcinogens

The Governing Board finds that feasible mitigation measures have been identified to minimize cumulative emissions of non-criteria pollutants to less than significant. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code §21061.1). Measures to mitigate cumulative air toxic impacts are identified in the Final PEIR and in the "Mitigation Monitoring Plan" section below.

2. The use of ammonia in SCRs is considered to be a potentially significant hazard impact due to the inherent risks associated with the use of anhydrous ammonia.

Finding and Explanation: Some control measures would require or encourage the use of SCRs, which use ammonia to reduce NOx emissions. The impacts associated with the use of anhydrous ammonia are potentially significant.

The Governing Board finds that feasible mitigation measures have been identified to minimize the hazard impacts associated with anhydrous ammonia to less than significant. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code §21061.1). Measures to mitigate hazard impacts associated with the transport, storage, and use of ammonia are identified in the Final PEIR and in the "Mitigation Monitoring Plan" section below.

3. The hazards associated with marine vapor recovery control measures are potentially significant since the boat hull can collect leaking heavy gasoline vapors.

Findings and Explanation: The marine vapor recovery control measure may involve collection of emissions at the dispenser and installation of add-on control equipment, e.g., carbon adsorption systems. There is a potential to form an explosive gas mixture when the vapors mix with air. This is a potentially significant hazard concern with boats since the boat hull can collect leaking heavy gasoline vapors.

The Governing Board finds that feasible mitigation measures have been identified to minimize the hazard impacts associated with marine vapor recovery systems to less than significant. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code §21061.1). Measures to mitigate hazard impacts associated with control equipment are identified in the Final PEIR and in the "Mitigation Monitoring Plan" section below.

4. Potentially significant water quality impacts could occur due to the unsafe handling and disposal of batteries.

Findings and Explanation: Implementation of the 2003 AQMP could require the use or contribute to increased use of electric vehicles. Since some batteries contain toxic materials, water quality impacts are possible if batteries are disposed of in an unsafe manner, such as by illegal dumping or by disposal in a landfill. Water quality impacts would include the leaching of toxic metals or acids into surface and ground water.

The Governing Board finds that feasible mitigation measures have been identified to minimize the potential water quality impacts associated with the unsafe handling of batteries to less than significant. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code §21061.1). Measures to mitigate potentially significant adverse water quality impacts from disposal of spent batteries are identified in the Final PEIR and in the "Mitigation Monitoring Plan" section below.

5. Illegal or improper disposal of electric batteries could result in significant solid waste impacts by allowing hazardous wastes to be disposed in municipal landfill.

Findings and Explanation: Illegal or improper disposal of electric batteries could result in significant solid waste impacts by allowing hazardous wastes to be disposed in municipal landfill.

The Governing Board finds that feasible mitigation measures have been identified to minimize the potential solid/hazardous waste impacts associated with the handling of batteries to less than significant. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code §21061.1). Measures to mitigate solid waste impacts from disposal of spent batteries are identified in the Final PEIR and in the "Mitigation Monitoring Plan" section below.

6. The solid/hazardous waste impacts associated with the use of carbon adsorption are considered significant prior to mitigation.

Findings and Explanation: Several control measures could encourage the use of carbon adsorption as air pollution control equipment, increasing the amount of activated carbon required for use. The solid/hazardous waste impacts associated with the use of carbon adsorption are considered significant prior to mitigation.

The Governing Board finds that feasible mitigation measures have been identified to minimize the potential solid/hazardous waste impacts associated with the increased use of activated carbon to less than significant. CEQA defines "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (Public Resources Code

§21061.1). Measures to mitigate solid waste impacts from disposal of spent carbon are identified in the Final PEIR and in the "Mitigation Monitoring Plan" section below.

Statement of Findings Conclusion

Changes or alterations have been incorporated into the Final PEIR for the 2003 AQMP to mitigate or minimize the potentially significant adverse environmental effects associated with certain project impacts, i.e., air quality impacts and hazards impacts. No additional feasible mitigation measures or project alternatives, other than those already included in the Final PEIR, have been identified that can further mitigate the potentially significant project impacts on air quality and hazards and meet the proposed project objectives.

All feasible mitigation measures identified in the Final PEIR have been adopted as set forth in the mitigation monitoring program. The analysis indicated that the alternatives would not reduce to insignificant levels the significant air quality or hazard impacts identified for the proposed project.

The purpose of the 2003 AQMP is to establish a comprehensive regulatory program to attain and maintain all state and federal ambient air quality standards through implementation of different categories of control measures. To achieve emission reductions necessary to meet state and federal ambient air quality standards, the 2003 AQMP also relies on advances in technology that are reasonably expected to be available by the year 2010. The SCAQMD finds that the proposed project achieves the best balance between minimizing potential adverse environmental impacts and achieving the project objectives of complying with state and federal ambient air quality standards. The SCAQMD further finds that all of the findings presented in this "Statement of Findings" are supported by substantial evidence in the record.

The record of approval for this project may be found in the SCAQMD's Clerk of the Board's Office located at SCAQMD Headquarters in Diamond Bar, California.

STATEMENT OF OVERRIDING CONSIDERATIONS

If significant adverse impacts of a proposed project remain after incorporating mitigation measures or no measures or alternatives to mitigate the adverse impacts are identified, the lead agency must make a determination that the benefits of the project outweigh the unavoidable adverse environmental effects if it is to approve the project. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project (CEQA Guidelines §15093 [a]). If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable" (CEQA Guidelines §15093 [a]). Accordingly, a Statement of Overriding Considerations regarding potentially significant adverse air quality and hazard impacts resulting from implementing the 2003 AQMP has been prepared. This Statement of Overriding Considerations is included as part of the record of the project approval for the

proposed project. Pursuant to CEQA Guidelines §15093(c), the Statement of Overriding Considerations will also be noted in the Notice of Determination for the proposed project.

Despite the inability to incorporate changes into the project that will mitigate potentially significant adverse air quality and hazard impacts to a level of insignificance, the SCAQMD's Governing Board finds that the following benefits and considerations outweigh the significant unavoidable adverse environmental impacts:

1. The long-term effect of the 2003 AQMP control measures is the reduction of emissions district-wide, contributing to attaining and maintaining, with a margin of safety, state and federal ambient air quality standards. Implementation of the 2003 AQMP control measures will continue to reduce emissions from stationary and mobile sources. In the long term, the 2003 AQMP is expected to produce a net reduction in district-wide emissions, but rather would result in a substantial reduction in emissions from stationary and mobile sources.

2. The emission reductions achieved by implementation of the 2003 AQMP control measures would ensure the potential emission increases would not result in significant adverse cumulative air quality effects. Additionally, other factors are expected to further reduce emissions from mobile sources over time. These factors include an increased percentage of cleaner vehicles in the vehicle universe and reduced congestion resulting from implementation of the Southern California Association of Government's (SCAG) Transportation Control Measures.

3. The proposed 2003 AQMP is necessary because the District does not currently comply with the state and federal ambient air quality standards for ozone and PM10. The focus of the Plan is to demonstrate attainment with the federal PM10 ambient air quality standard by 2006 and with the federal 1-hour ozone in 2010 while making expeditious progress toward attainment of state standards and upcoming new federal standards. Significant improvements in air quality will be necessary to bring the Basin into attainment by federal deadlines. Failure to implement the 2003 AQMP (i.e., develop additional control measures), would guarantee that the Basin would not meet the state and federal ozone and PM10 standards by the applicable dates.

4. The California Clean Air Act requires a non-attainment area to update its SIP triennially to incorporate the most recent available technical information. In addition, the U.S. EPA requires that transportation conformity budgets be established based on the most recent planning assumptions, i.e., within the last five years. Therefore, a plan update is necessary to ensure continued progress toward attainment and to avoid a transportation conformity lapse and associated federal sanction. Failure to adopt an AQMP would be against state and federal law.

5. The analysis of potential adverse environmental impacts incorporates a "worst-case" approach. This entails the premise that whenever the analysis requires that assumptions

be made, those assumptions that result in the greatest adverse impacts are typically chosen. This method likely overestimates the actual impacts from the proposed project.

The SCAQMD's Governing Board finds that the above-described considerations outweigh the unavoidable significant effects to the environment as a result of the proposed project.

MITIGATION MONITORING PLAN

Introduction

CEQA requires an agency to prepare a plan for reporting and monitoring compliance with and implementation of measures to mitigate significant adverse environmental impacts. Mitigation monitoring requirements are included in CEQA Guidelines §15097 and Public Resources Code §21081.6, which specifically state:

When making findings as required by subdivision (a) of Public Resources Code §21081 or when adopting a negative declaration pursuant to Paragraph (2) of subdivision (c) of Public Resources Code §21080, the public agency shall adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment (Public Resources Code §21081.6). The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of an agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.

The provisions of CEQA Guidelines §15097 and Public Resources Code §21081.6 are triggered when the lead agency certifies a CEQA document in which mitigation measures, changes, or alterations have been required or incorporated into the project to avoid or lessen the significance of adverse impacts identified in the CEQA document. Public Resources Code §21081.6 leaves the task of designing a reporting or monitoring plan to individual public agencies.

To fulfill the requirements of CEQA Guidelines §15097 and Public Resources Code §21081.6, the SCAQMD must develop a plan to monitor project compliance with those mitigation measures adopted as conditions of approval for the 2003 AQMP PEIR. The following subsections identify the specific mitigation measures identified in the PEIR and the public agency responsible for monitoring implementation of each mitigation measure.

General Mitigation Monitoring and Reporting

The responsibility for mitigation monitoring and reporting described in this plan will vary depending on the location and jurisdiction of individual projects, since the project is part of a Program EIR. It is expected that additional and more specific mitigation measures and monitoring requirements will be developed as specific rules are promulgated.

A. Environmental Impacts That Cannot Be Mitigated to Less than Significant

The environmental resources that were identified in the Final PEIR as having significant or potentially significant adverse impacts are identified below. The Final PEIR concluded that no significant adverse impacts on aesthetics, agriculture resources, biological resources, cultural resources, energy, geology/soils, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, solid/hazardous waste, and transportation/circulation. The Final PEIR concluded that significant adverse impacts to air quality and hazards would be expected due to implementation of the 2003 AQMP.

Air Quality Impacts

Secondary Emissions from Miscellaneous Sources are Potentially Significant

The air quality analysis concludes that the NOx emissions from trucks hauling manure out of the district (Control Measure WST-01, MSC-04 and some long-term control measures) could generate significant adverse impacts. Incentive programs to use alternative clean fuels or install controls may reduce NOx emissions from haul trucks to less than significant. However, because incentive programs are voluntary, NOx emission reductions are not guaranteed.

Mitigation Measures for Secondary Emissions from Miscellaneous Sources

Incentive programs to use alternative clean fuels or install particulate traps and oxidation may reduce NOx emissions from haul trucks to less than significant. However, because incentive programs are voluntary, NOx emission reductions are not guaranteed. No other feasible mitigation measures were identified so NOx emission increases from this control measure remain significant.

Secondary Air Quality Impacts Associated with the Control of Mobile Sources Could be Generated Related to the Manufacture of Clean Fuels

Significant adverse secondary air quality impacts associated with the control of mobile sources could be generated related to the manufacture of clean fuels in two areas. The first area is operational air quality impacts at local refineries resulting from modifications of existing equipment or installation of new equipment that would be necessary to manufacture clean fuels. The second source of emissions related to the production of clean fuels is emissions from marine vessels and trains importing oxygenates and other refinery feedstocks into the district.

Mitigation Measures for Emissions Generated from the Manufacture of Clean Fuels

Modifications of existing equipment and installation of new equipment would both be subject to Regulation XIII – New Source Review, or Rule 2005 – New Source Review for RECLAIM, and Lowest Achievable Emission Rate (LAER) requirements. Since new or

modified equipment is already subject to LAER, by definition no additional emission reductions can be achieved by this equipment. Therefore, additional mitigation measures to reduce stationary source equipment emissions related to the production of clean fuels are not available.

Because marine vessels and trains are under the jurisdiction authority of U. S. EPA, the SCAQMD is pre-empted from regulating emissions from these sources at this time and no additional feasible mitigation measures have been identified.

Air Quality Construction Phase Impacts Are Potentially Significant

Construction and demolition-related emissions of PM10 would exceed the SCAQMD significance threshold for daily emissions**.** Emission sources include worker vehicles, heavy construction equipment, and grading activities.

Air Quality Construction Phase Mitigation Measures

Based on emission estimates from the construction phase, the significance thresholds for construction air quality impacts provided in Chapter 4 of the Final PEIR will be exceeded. Therefore, the following mitigation measures to reduce construction-related emissions shall be implemented.

On-Road Mobile Sources:

AQ-1 Develop a Construction Traffic Emission Management Plan for the proposed project. The Plan shall include measures to minimize emissions from vehicles including, but not limited to: scheduling truck deliveries to avoid peak hour traffic conditions, consolidating truck deliveries, and prohibiting truck idling in excess of 10 minutes.

Off-Road Mobile Sources:

AQ-2 Prohibit trucks from idling longer than 10 minutes at construction sites.

AQ-3 Use electricity or alternate fuels for on-site mobile equipment instead of diesel equipment to the extent feasible.

AQ-4 Maintain construction equipment by conducting regular tune ups and retard diesel engine timing.

AQ-5 Use electric welders to avoid emissions from gas or diesel welders at sites where electricity is available.

AQ-6 Use on-site electricity rather than temporary power generators in portions of the project sites where electricity is available.

AQ-7 Prior to construction, operators of affected facilities will evaluate the feasibility of retrofitting the large off-road construction equipment that will be operating for significant periods. Retrofit technologies such as particulate traps, selective catalytic reduction, oxidation catalysts, air enhancement technologies, etc. will be evaluated. These technologies will be required if they are certified by CARB and/or the U.S. EPA and are commercially available and can feasibly be retrofitted onto construction equipment.

AQ-8 Diesel-powered construction equipment shall use low sulfur diesel, as defined in SCAQMD Rule 431.2, to the maximum extent feasible.

AQ-9 Suspend the use of all construction activities during first stage smog alerts. This mitigation measure does not apply to emergency activities associated with essential public services.

Mitigation Monitoring and Reporting

Implementing Party: Because the EIR for the 2003 AQMP is a Program EIR for an ongoing regulatory program, the SCAQMD finds that the air quality mitigation measures for construction and demolition will be implemented by various lead and local agencies and project applicants within the district. To the extent that construction results from complying with SCAQMD rules that have been promulgated from AQMP control measures, the SCAQMD can impose permit conditions on permit applicants at the time permit applications are processed and approved.

Monitoring Agency: Because the EIR for the 2003 AQMP is a Program EIR and general in nature, the monitoring agency is expected to vary and include lead a local agencies within the Basin. Monitoring will be accomplished as follows:

MMAQ-1 A project applicant shall develop and submit a Construction Emission Management Plan to the lead/local agency for approval. Alternatively, the lead/local agency can develop a monitoring plan applicable to projects within its jurisdiction. The Construction Traffic Emissions Management Plan shall include the following: description of construction traffic control methods such as flag persons, contractor entry/exit gates, etc.; construction schedule including hours of operation; description of truck routing; and description of deliveries, including hours of delivery.

The plan shall be submitted to the lead/local agency for approval prior to beginning construction activities. The lead/local agency should conduct routine inspections of the construction site to verify compliance.

MMAQ-2 The applicant shall instruct individuals that accept delivery of materials of the requirement to limit truck idling to no longer than 10 minutes. The applicant will evaluate the expected delivery time and if the delivery is expected to take longer than 10 minutes, the truck's operator will be asked to shut off the engine.

MMAQ-3 The applicant shall evaluate the use of electricity and alternate fuels for on-site mobile construction equipment prior to the commencement of construction activities. The type of equipment that will use electricity or alternate fuels will be included in the Construction Emission Management Plan.

MMAQ-4 The applicant shall maintain or cause to be maintained maintenance records for the construction equipment. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule.

MMAQ-5 The use of gas or diesel welders shall be prohibited in areas that have access to electricity. Construction areas where electricity is not available will be identified on a site plan as part of the Construction Emission Management Plan. The use of gas or diesel welders within these identified areas will be allowed. The use of gas or diesel welders outside of these identified areas shall be prohibited. The applicant shall include in all construction contracts the requirement that diesel welders are prohibited in certain portions of the site as identified on the site plan. The applicant shall maintain records on where the diesel welders are actually used.

MMAQ-6 The use of temporary power generators shall be prohibited in areas that have access to electricity. Construction areas where electricity is not available will be identified on a site plan as part of the Construction Emission Management Plan. The use of temporary power generators within these identified areas will be allowed. The use of temporary power generators outside of these identified areas shall be prohibited. The applicant shall include in all construction contracts the requirement that the use of temporary power generators is prohibited in certain portions of the site as identified on the site plan. The applicant shall maintain records on where the generators are actually used.

MMAQ-7 The applicant shall supply the local/lead agency with a report prior to commencement of construction activities that documents the availability of retrofit technologies for large construction equipment. A copy of this report shall be maintained on-site along with other recordkeeping required by this Mitigation Monitoring Plan.

MMAQ-8 The applicant shall supply the local/lead agency with a report prior to commencement of construction activities that documents the availability low sulfur diesel fuel. A copy of this report shall be maintained on-site along with other recordkeeping required by this Mitigation Monitoring Plan.

MMAQ-9 The applicant shall maintain a log that contains the days when first stage smog alerts occur and the time that construction activities were suspended or the reasons (emergency conditions) that the activities were not suspended.

Hazard Impacts

Refinery modifications to produce additional quantities of clean fuels could result in significant hazard impacts.

Although the specific modifications to the refineries are currently unknown, changes that would require that additional fuels be produced would require refinery modifications which could include the ability to process additional quantities of crude, crack more intermediate streams, and the ability to produce more alkylate (the main blending component of gasoline). Refineries operate at or near capacity on a continuous basis. Therefore, modifications to existing major processing units or the construction of new major processing units at the refineries would be required. Based on the analysis from previous refinery modifications to produce CARB Phase 2 and Phase 3, it is expected that some of these modifications would result in significant hazard impacts, resulting in an increase in exposure to hazardous materials/flammable materials to the surrounding population.

Mitigation Measures for Hazards Associated with Refinery Modifications to Produce Clean Fuels

The hazard impacts associated with refinery modifications are potentially significant. Compliance with existing regulations and implementation of the safety review measures would further minimize the potential impacts associated with a release but are not expected to eliminate the potential hazard impacts. Therefore, the following mitigation measures are required:

HZ1: To reduce the likelihood of the occurrence of an upset condition, a pre-start up safety review will be performed for those refinery additions and proposed modifications, where the change is substantial enough to require a change in the process safety information and/or where an acutely hazardous and/or flammable material would be used. The review will be performed by personnel with expertise in process operations and engineering. The review will verify the following:

- Construction and modifications are in accordance with design specifications and applicable codes.
- Safety, operating, maintenance, and emergency procedures are in place and are adequate.
- Process hazard analysis recommendations have been addressed and actions necessary for start-up have been completed.
- Training of each operating employee and maintenance worker has been completed.

- Written process safety information is available for the employer and employees to identify and understand the hazards posed by the process.

Mitigation Monitoring and Reporting

Implementing Party: The SCAQMD finds that the hazard mitigation measures for refinery modifications will be implemented by the SCAQMD during its permit review process, since refinery modifications generally require modifications to or new air quality permits. Other agencies that can implement this mitigation measure include the Office of Emergency Services (OES) and local fire department as part of its jurisdiction over Risk Management Plans, and the Occupational Safety and Health Administration as part of the Process Safety Management Program.

Monitoring Agency: The SCAQMD, OES and local fire departments through their discretionary authority to issue and enforce permits will ensure compliance with this mitigation measure. Monitoring will be accomplished as follows:

MMHZ-1 The applicant will be required to keep records onsite regarding its compliance efforts, e.g., revision of its Process Safety Management Program, Risk Management Program, corporate safety programs, internal and external inspections, Notices to Comply, Notices of Violations, and corrective action taken in response, to demonstrate steps take to assure compliance with this mitigation measure and related permit conditions.

B. Environmental Impacts That Can Be Mitigated to Less Than Significant

The environmental resources that were identified in the Final PEIR as having potentially significant adverse impacts that can be mitigated to less than significant are identified below.

Air Quality Impacts

Cumulative Impacts Associated with Non-Criteria Pollutant Emissions Are Potentially Significant

Increases in the use methylene chloride and perchloroethylene could occur in consumer products because they are specifically exempted from the VOC definition due to their very low ozone-forming capabilities. As a result, some manufacturers may choose to use methylene chloride or perchloroethylene in the reformulations to reduce the VOC content in meeting future limits, thus increasing ambient levels of methylene chloride and perchloroethylene, which are carcinogens

Mitigation Measures for Non-Criteria Pollutant Emissions

Potentially significant cumulative impacts for non-criteria pollutants were identified so the following mitigation measure is proposed and is expected to reduce the emissions to less than significant.

AQ-10 During promulgation of new rules and rule amendments, the SCAQMD will continue implementing SCAQMD environmental justice enhancement II-1 – "Lowest Air Toxics" Assessment Alternative, to evaluate ways to eliminate or reduce the use of substances that could contribute to TAC emissions.

Mitigation Monitoring and Reporting

Implementing Party: The SCAQMD finds that the air quality mitigation measures for non-criteria pollutant emissions will be implemented by the SCAQMD during its rulemaking activities.

Monitoring Agency: The SCAQMD through its discretionary authority to develop rules and issue and enforce permits will ensure compliance with this mitigation measure. Monitoring will be accomplished as follows:

MMAQ-10 The SCAQMD will review ways to eliminate or reduce the use of substances that could contribute to TAC emissions as part of the rulemaking process. This review will be completed as part of the Environmental Assessment or Staff Report for new rules that have the potential to contribute to TAC emissions.

Hazard Impacts

The use of ammonia in SCRs is considered to be a potentially significant hazard impact due to the inherent risks associated with the use of anhydrous ammonia.

Some control measures would require or encourage the use of SCRs, which use ammonia to reduce NOx emissions. The impacts associated with the use of anhydrous ammonia are potentially significant.

Mitigation Measures for Hazards Associated with SCRs

The impacts associated with the use of anhydrous ammonia are potentially significant. Aqueous ammonia is an appropriate alternative and its use is not expected to result in significant hazard impacts. Therefore, the following mitigation measures are required:

HZ2: Rules encouraging the use of SCRs or permits for SCRs shall limit the catalyst to aqueous ammonia or its equivalent. Current SCAQMD policy already requires using aqueous ammonia.

HZ3: Require the use of transportation routes for ammonia shipments to facilities that ensures minimum exposure to sensitive population and further minimize risks by shipping ammonia during off-peak times. This will be accomplished by implementing the following mitigation measures:

1. Prior to the first delivery of aqueous ammonia to a site, truck haul routes shall be submitted to the SCAQMD for review and approval.

2. The haul routes shall minimize rail crossings and crossings of busy intersections.

3. When travelling on surface streets, the haul routes shall not come within one-quarter mile of an existing or proposed school, where feasible.

4. Deliveries shall not be en route during peak traffic hours, which generally occur between 7:00 AM and 9:00 AM or between 4:00 PM and 6:00 PM weekdays.

5. The haul routes shall be resubmitted if suppliers are changed.

HZ4: Require construction of containment dikes to be used during off-loading operations.

HZ5: Require construction of containment dikes around ammonia storage tanks to contain the volume of the tank.

Use of aqueous ammonia at concentrations less than 20 percent by volume in conjunction with the above mitigation measures can reduce hazard impacts associated with ammonia use to less than significant.

Mitigation Monitoring and Reporting

Implementing Party: The SCAQMD finds that the hazard mitigation measures for SCRs will be implemented by the SCAQMD during its rule development and permit processing, since SCRs, as air pollution control equipment, generally require modifications to or new air quality permits.

Monitoring Agency: The SCAQMD through its discretionary authority to develop rules and issue and enforce permits will ensure compliance with this mitigation measure. Monitoring will be accomplished as follows:

MMHZ-2 New rules developed by the SCAQMD that encouraging the use of SCRs or new or modified permits for SCRs shall limit the catalyst to aqueous ammonia or its equivalent.

MMHZ-3 Prior to the first delivery of ammonia, SCAQMD permit conditions will require permit applicants to submit a report that documents the transportation

routes for ammonia shipments, the intended hours of delivery, and identifies any existing or proposed schools within one-quarter mile of a school.

MMHZ-4 The SCAQMD permits to construct/operate will include a permit condition that requires construction of containment dikes to be used during off-loading operations.

MMHZ-5 The SCAQMD permits to construct/operate will include a permit condition that requires construction of containment dikes around ammonia storage tanks to contain the volume of the tank.

The hazards associated with marine vapor recovery control measures are potentially significant since the boat hull can collect leaking heavy gasoline vapors.

The marine vapor recovery control measure may involve collection of emissions at the dispenser and installation of add-on control equipment, e.g., carbon adsorption systems. There is a potential to form an explosive gas mixture when the vapors mix with air. This is a potentially significant hazard concern with boats since the boat hull can collect leaking heavy gasoline vapors.

Mitigation Measures for Hazards Associated with Marine Vapor Recovery Control Measures

The impacts associated with marine vapor recovery control measures are potentially significant. Implementation of the following mitigation measure is expected to minimize the hazard impacts associated with vapor recovery to less than significant.

HZ6: Rules implementing the vapor recovery control measures at marinas shall ensure that vapor recovery systems are submitted to the State Fire Marshal, if applicable, for review and comment prior to implementation.

Mitigation Monitoring and Reporting

Implementing Party: The SCAQMD finds that the hazard mitigation measures for marine vapor recovery system will be implemented by the CARB during its rulemaking process and the State Fire Marshal.

Monitoring Agency: CARB through its discretionary authority to develop rules for marine vessel will ensure compliance with this mitigation measure. Monitoring will be accomplished as follows:

MMHZ-6 New rules developed by CARB associated with marine vapor recovery systems should be submitted to the State Fire Marshal for review and approval. Recommendations from the State Fire Marshal should be incorporated in the proposed rules.

Hydrology/Water Quality Impacts

Potentially significant water quality impacts could occur due to the unsafe handling and disposal of batteries.

Implementation of the 2003 AQMP could require the use or contribute to increased use of electric vehicles. Since some batteries contain toxic materials, water impacts are possible if they are disposed of in an unsafe manner, such as by illegal dumping or by disposal in a landfill. Water quality impacts would include the leaching of toxic metals or acids into surface and ground water.

Mitigation Measures Associated with the Unsafe Handling and Disposal of Batteries

California laws and regulations create the following incentives and requirements for disposal of recycling of batteries: (1) Under CARB regulations, to certify either a new or retrofit ZEV, automakers must complete Crab's certification application, which must include a battery disposal plan. Thus current regulations require ZEV manufacturers to take account for the full life-cycle of car batteries and to plan for safe disposal or recycling of battery material; (2) California law requires the recycling of lead-acid batteries (California Health & Safety Code §25215). Spent lead-acid batteries being reclaimed are regulated under 22 CCR §66266.80 and 66266.81, and 40 CFR part 266, Subpart G; and (3) California law requires state agencies to purchase car batteries made from recycled material (Public Resources Code §42440). The mitigation measures identified below are expected to minimize any increase in illegal disposal of batteries by requiring the exchange of old batteries for new batteries and reducing the potential for increased illegal disposal to less than significant.

HWQ 4: Require leasing, deposit or rebate programs for electric batteries. Leasing and rebate programs can both be effective measures to increase the rate or recovery of spent batteries, and both types of measures are already proven in practice. Deposit programs can also achieve the same goals.

HWQ 5: Require spent battery exchange for battery replacement. Require that ZEV service stations sell or install new batteries only on condition that they receive the spent batteries in exchange.

Mitigation Monitoring and Reporting

Implementing Party: The SCAQMD finds that the hydrology/water quality mitigation measures for battery replacement should be implemented by car manufacturing, and car maintenance facilities.

Monitoring Agency: CARB through its discretionary authority to develop rules for electric vehicles can and should ensure compliance with this mitigation measure. Monitoring will be accomplished as follows:

MMHWQ-4 Car manufacturers should require leasing, deposit or rebate programs for electric batteries. A leasing, rebate or deposit programs should be developed as part of the car purchase agreement

MMHWQ-5 Service stations, car maintenance facilities and battery sellers should require that spent batteries be exchanged for new battery replacement. Service stations, car maintenance facilities and battery sellers should install new batteries only on condition that they receive the spent batteries in exchange.

Solid/Hazardous Waste Impacts

Illegal or improper disposal of electric batteries could result in significant solid waste impacts by allowing hazardous wastes to be disposed in municipal landfill.

Illegal or improper disposal of electric batteries could result in significant solid waste impacts by allowing hazardous wastes to be disposed in municipal landfill.

Mitigation Measures for Illegal or Improper Disposal of Electric Batteries

The following mitigation measures have been identified to minimize the potential solid/hazardous waste impacts associated with the handling of batteries to less than significant.

SHW 1: Require leasing, deposit or rebate programs for electric batteries. Leasing and rebate programs can both be effective measures to increase the rate of recovery of spent batteries, and both types of measures are already proven in practice. Deposit programs can also achieve the same goals.

SHW 2: Require spent battery exchange for battery replacement. Require that ZEV service stations sell or install new batteries only on condition that they receive the spent batteries in exchange.

Mitigation Monitoring and Reporting

Implementing Party: The SCAQMD finds that the hydrology/water quality mitigation measures for battery replacement should be implemented by car manufacturing, and car maintenance facilities.

Monitoring Agency: CARB through its discretionary authority to develop rules for electric vehicles can and should ensure compliance with this mitigation measure. Monitoring is the same as described for MMHWQ-4 and MMHWQ-5.

The solid/hazardous waste impacts associated with the use of carbon adsorption are considered significant prior to mitigation.

Several control measures could encourage the use of carbon adsorption as air pollution control equipment, increasing the amount of activated carbon required for use. The solid/hazardous waste impacts associated with the use of carbon adsorption are considered significant prior to mitigation.

Mitigation Measures for Carbon Adsorption

The following mitigation measures have been identified to minimize the potential solid/hazardous waste impacts associated with the increased use of activated carbon to less than significant.

SHW3: Recycling and reusing activated carbon should be required to minimize the amount of spent carbon waste being transferred to landfills.

Mitigation Monitoring and Reporting

Implementing Party: The SCAQMD finds that the solid/hazardous waste mitigation measures for should be implemented by suppliers and uses of activated carbon.

Monitoring Agency: The SCAQMD will place permit conditions on projects using carbon adsorption control technology to require a contractual agreement with the equipment vendor to recycle spent carbon rather than disposing of it in landfills.

MMSHW-3: Suppliers of activated carbon should require that activated carbon supplied to a facility be returned when new carbon is purchased and delivered. Activated carbon should only be disposed when its use has been exhausted.

C. Environmental Impacts That Were Not Significant but Where Mitigated Measures Were Recommended

The environmental resources that were identified in the Final PEIR as being less than significant but mitigation measures are recommended are identified below.

The Illegal Disposal of Spent Cleaning Materials Could Result in Water Quality Impacts

As with solvent based materials, the illegal disposal of spent cleaning materials could result in significant adverse water quality impacts. Potential adverse wastewater impacts associated with reformulated solvents are expected to be minimal since: (1) compliance with state and federal waste disposal regulations would preclude adverse impacts; (2) "turn-key" services are available for aqueous cleaners; (3) some solvent cleaning operators may currently be disposing of spent material illegally; and (4) the amount of wastewater which may be generated from reformulated solvents is well within the projected receiving capacity of the POTWs in the SCAQMD's jurisdiction.

Recommended Mitigation Measures for the Illegal Disposal of Spent Cleaning Materials

The following mitigation measures are recommended to minimize the potential for illegal disposal of spent cleaning materials.

HWQ1: To ensure that users of reformulated solvents are aware of the proper disposal methods for reformulated solvents, the SCAQMD will provide an outreach and education program for affected parties. The SCAQMD will coordinate the outreach program with POTWs, the DTSC, and other appropriate agencies.

HWQ2: The Sanitation Districts and other sewage agencies must increase their surveillance programs to quantify measurable effects resulting from this control measure and take appropriate action as necessary.

HWQ3: CARB will monitor the use and limit or prohibit the use of toxic air contaminants, including perchloroethylene and methylene chloride, in reformulated consumer products.

Mitigation Monitoring and Reporting

Implementing Party: The SCAQMD finds that the hydrology/water quality mitigation measures mitigation measures should be implemented by the SCAQMD, Sanitation Districts, POTWs, and CARB.

Monitoring Agency: The Sanitation Districts and POTWs through their jurisdiction over wastewater discharge would have primarily authority to monitor and enforce this mitigation measure. CARB also would have jurisdiction to monitor and enforce the use of toxic air contaminants in consumer products.

MMHWQ-1: The SCAQMD will coordinate the outreach and education program for affected parties. The SCAQMD will coordinate the outreach program with POTWs, the DTSC, and other appropriate agencies as part of its rulemaking process.

MMHWQ-2: The Sanitation Districts and other POTWs can monitor and enforce wastewater discharges through the issuance of wastewater discharge permits. Additional enforcement and monitoring may be required as new rules are developed.

MMHWQ-3: CARB will review the potential use and of toxic air contaminants, including perchloroethylene and methylene chloride, in reformulated consumer products when rules are developed. As appropriate, limitations and prohibition on the use of certain materials can be imposed.

Increased Water Consumption May Occur Due to Maintenance of Planted Trees

Increased water consumption may occur due to maintenance of trees planted as part of control measure MSC-01 – Promotion of Lighter Color Roofing and Road Materials and Tree Planting Programs. The quantity of water which may be required to implement this control measure is unknown since it is not clear whether or not trees would be planted to comply with the measure because of local ordinances or requirements to landscape new developments.

Mitigation Measures for Increased Water Consumption May Occur Due to Maintenance of Planted Trees

The following mitigation measure is recommended to minimize water consumption for the maintenance of planted trees.

HWQ 6: Require the use of species that are drought tolerant or require only moderate watering, and encourage use of native species in tree planting programs, where appropriate, to minimize water consumption. Educate the public on water conservation strategies when planting trees, such as organic mulch, deep watering, water berms/wells, and visual monitoring.

Mitigation Monitoring and Reporting

Implementing Party: Because the EIR for the 2003 AQMP is a Program EIR and general in nature, the SCAQMD finds that the mitigation measures for water demand and consumption will be implemented by various lead and local agencies within the District.

Monitoring Agency: Because the EIR for the 2003 AQMP is a Program EIR and general in nature, the monitoring agency is expected to vary and include lead and local agencies and project applicants within the Basin. Monitoring will be accomplished as follows:

MMHWQ-6: A project applicant that is subject to the tree planting requirements shall develop and submit a planting program to the lead/local agency for approval. The planting program should include the type of plant material proposed, the type of soil to be used, location of planting, the watering requirements, and the maintenance activities to assure the long-term survival of the plants. Alternatively, the lead/local agency can develop a planting program that outlines the above requirements and include them in the local approval process.