

SECTION 8.0
UNAVOIDABLE ADVERSE IMPACTS

8.0 UNAVOIDABLE ADVERSE IMPACTS

This section summarizes the unavoidable adverse impacts associated with the proposed project. Specifically, Section 15126.2(b) of the California Environmental Quality Act (CEQA) Guidelines requires that an Environmental Impact Report (EIR):

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

Section 6.0 (Resource Specific Analysis) of this Draft EIR (DEIR) documents the analysis of the potentially significant adverse impacts associated with the proposed project. The proposed project would result in unavoidable adverse impacts related to air quality, even after mitigation, as noted in the analyses contained within Section 6.0 of this DEIR.

8.1 AIR QUALITY

8.1.1 VARIATION 1

As described in Section 6.2 (Air Quality) of the DEIR, operation of Variation 1 would result in the generation of criteria pollutants that would exceed the South Coast Air Quality Management District's (SCAQMD) mass daily thresholds and localized significant thresholds for NO_x, PM₁₀, and PM_{2.5}. Additionally, because Variation 1 would result in PM₁₀ emissions in excess of the SCAQMD's localized significance threshold, this impact could potentially conflict with the SCAQMD's attainment goals for 8-hour ozone and PM₁₀, as set forth in the Air Quality Management Plan (AQMP). Even with implementation of mitigation measures AQ-1 through AQ-13, which represent all feasible mitigation measures, emissions of NO_x, PM₁₀ and PM_{2.5} generated during operation of Variation 1 would not be reduced to below a level of significance. Therefore, implementation of Variation 1 would result in significant unavoidable adverse air quality impacts.

8.1.2 VARIATION 2

As described in Section 6.2 (Air Quality) of the DEIR, "new" construction activities associated with Variation 2 would include the installation of the 13-acre liner, including a geomembrane, geotextile, and drainage layer comprised of sand and gravel, as well as excavation of the hill located in the northern portion of the property. Peak daily construction emissions associated with these activities would exceed the SCAQMD's mass daily threshold and localized significant threshold for NO_x emissions. Even with implementation of mitigation measures AQ-1 through AQ-13, which represent all feasible mitigation measures, emissions of NO_x generated during Variation 2 construction, would not be reduced to below a level of significance. Therefore, construction of Variation 2 would result in significant unavoidable adverse air quality impacts.

Operation of Variation 2 would result in the generation of criteria pollutants that would exceed the SCAQMD's mass daily thresholds and localized significant thresholds for NO_x, PM₁₀, and PM_{2.5}. Additionally, because Variation 2 would result in PM₁₀ emissions in excess of the SCAQMD's localized significance threshold, this impact could potentially conflict with the SCAQMD's attainment goals for 8-hour ozone and PM₁₀, as set forth in the Air Quality Management Plan (AQMP). Even with implementation of mitigation measures AQ-1 through AQ-13, which represent all feasible mitigation measures, emissions of NO_x, PM₁₀ and PM_{2.5} generated during operation of Variation 2 would not be reduced to below a level of significance. Therefore, operation of Variation 2 would result in significant unavoidable adverse air quality impacts.