EXHIBIT A

Findings of Fact

and

Statement of Overriding Considerations

La Loma Bridge Rehabilitation Replacement Project

(SCH # 2003101150)

Findings by

the City of Pasadena

June 2006

Table of Contents

1 INTRODUCTION

This *Findings and Statement of Overriding Considerations* document is divided into five major sections. Section 1 (Introduction) provides background information as to the purpose of the document. Section 2 (Project Description) provides a brief discussion of the proposed project. Section 3 (Findings Regarding Environmental Effects) presents the significant effects associated with the preferred alternative, i.e., the Bridge Retrofit and Rehabilitation Alternative. Section 4 (Alternatives to the Proposed Project) provides a brief discussion of other alternatives that were evaluated in the EIR/EA. Finally, Section 5 (Statement of Overriding Considerations) is provided for those adverse effects that cannot be feasibly mitigated or avoided, even with the adopted mitigation measures.

Mitigation measures are referenced in the *Mitigation Monitoring and Reporting Program* adopted concurrently with these findings, and will be effectuated through the process of constructing and implementing the project.

Except as otherwise noted, the findings reported in the following pages incorporate the facts and discussions of environmental impacts that are found in the *Final Environmental Impact Report/Environmental Assessment* (Final EIR/EA) for the La Loma Bridge Rehabilitation Replacement Project as fully set forth therein. These findings constitute the decision-makers' best efforts to set forth the rationales and support for their decision under the requirements of CEQA.

For each of the significant project or cumulative impacts associated with the project, the following information is provided:

- Significance Criteria – Standards to which the proposed project is subject for determining whether a significant impact would occur.

- Description of Significant Effect – A specific description of each significant environmental impact identified in the Final EIR/EA.

- Proposed Mitigation – Mitigation measures or actions that are proposed for implementation as part of the project.

- Finding – The findings made are those allowed by Section 21081 of the California Public Resources Code. The findings are made in two parts. In the first part, a judgment is made regarding the significance of the impact or effect. In the second part, which pertains only to impacts found to be significant, one of three specific findings is made, in accordance with the statement of acceptable findings provided in Section 15091 of the *CEQA Guidelines*.

- Rationale – A summary of the reasons for the decision.

- Reference – A notation on the specific section in the Draft or Final EIR/EA that includes the evidence and discussion of the identified impact.

Pursuant to Section 21081.6 of the California Public Resources Code and Section 15097 of the *CEQA Guidelines*, a *Mitigation Monitoring and Reporting Program* must be adopted in order to ensure the efficacy of proposed mitigation measures. The *Mitigation Monitoring and Reporting Program* for the La Loma Bridge Rehabilitation Replacement Project is a separate document presented for adoption together with these *Findings of Fact and Statement of Overriding Considerations*.

The Record of Proceedings for the City's decision on the proposed project consists of the following documents, at a minimum:

- The Notice of Preparation (NOP) and all other public notices issued by the City in conjunction with the project;
- The *Draft Environmental Impact Report/Environmental Assessment* (Draft EIR/EA) for the La Loma Bridge Rehabilitation Replacement Project and all Technical Appendices (October 2005);
- All comments submitted by agencies or members of the public during the 60-day comment period on the Draft EIR/EA;
- All comments and correspondence submitted to the City with respect to the project, in addition to timely comments on the Draft EIR/EA;
- The *Final Environmental Impact Report/Environmental Assessment* (Final EIR/EA) for the La Loma Bridge Rehabilitation Replacement Project, including comments received on the Draft EIR/EA, responses to those comments, errata, and technical appendices;
- The *Mitigation Monitoring and Reporting Program* for the project;
- All findings and resolutions adopted by the City in connection with the La Loma Bridge Rehabilitation Replacement Project, and all documents cited or referred to therein;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the project prepared by the City, consultants to the City, or responsible or trustee agencies with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the La Loma Bridge Rehabilitation Replacement Project;
- All documents submitted to the City by other public agencies or members of the public in connection with the La Loma Bridge Rehabilitation Replacement Project, up through the completion of the Final EIR/EA;

- Minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the La Loma Bridge Rehabilitation Replacement Project;

- Any documentary or other evidence submitted to the City at such information sessions, public meetings, and public hearings;

- Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations;

- Any documents expressly cited in these findings, in addition to those cited above; and

- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (e).

2 PROJECT DESCRIPTION

2-1 Project Objectives

The primary purpose of the proposed project is to improve safety. The specific objectives of the proposed project are to construct a new or improved bridge that:

- meets Caltrans design standards aimed at preventing structural failure,

- is aesthetically pleasing,

- minimizes maintenance and operating costs,

- represents a prudent and cost-effective use of local and federal financial resources, and

- minimizes impacts to the environment.

2-2 Project Location

The proposed project is located in the City of Pasadena and County of Los Angeles. La Loma Road Bridge crosses the Arroyo Seco, a Los Angeles River tributary originating in the San Gabriel Mountains. In the Arroyo Seco Master Plan (2002), the City divides the approximately 47-square-mile Arroyo Seco Watershed into three major sub-areas: Upper Arroyo, Central Arroyo, and Lower Arroyo. La Loma Bridge is located in the Lower Arroyo, where Pasadena's Lower Arroyo Park divides the residential neighborhoods of western Pasadena.

La Loma Bridge crosses the Lower Arroyo Seco tributary, watershed, and park and connects the western portion of Pasadena to the eastern portion of the City. Low-density, single-family

residential neighborhoods are located in the densely vegetated hillsides east and west of the bridge and Arroyo Seco. The portion of the Arroyo Seco tributary running beneath the bridge is channelized, and recreational trails used by pedestrians and equestrians border the channel. The terrain along the channel is characterized by steep slopes covered with brush and trees.

2-3 Project Description

The City, in cooperation with the California Department of Transportation (Caltrans) and the Federal Highway Administration (FHWA), is proposing to improve the existing La Loma Road Bridge to meet current seismic codes and standards through the use of local funds; Safe, Accountable, Flexible, Efficient Transportation Equity Act – A Legacy for Users (SAFETY-LU) funds; and funding to be obtained from the Federal Highway Bridge Repair and Rehabilitation (HBRR) Program.

Three build alternatives were developed, the environmental effects of which were evaluated in detail in the October 2005 Draft EIR/EA: (1) retrofit and rehabilitation, (2) replacement with a new concrete box- girder bridge, and (3) replacement with a new concrete box-girder bridge with decorative arches. The Bridge Retrofit and Rehabilitation Alternative, which is described below, has been identified as the preferred alternative by the City. The other two build alternatives have been eliminated from consideration by the City.

2-3.1 Bridge Retrofit and Rehabilitation Alternative

The existing bridge structure has inadequate strength and displacement capacities at the piers, arch ribs, arch struts, spandrel columns, footings, transverse floor beams, and expansion joints. Retrofit describes the strengthening, reinforcement, and other activities necessary to prevent the bridge from collapsing under the maximum credible earthquake event, in accordance with current seismic design standards. Rehabilitation includes aesthetic elements and repairs that would contribute to the bridge's overall appearance and function but are not required to ensure its seismic performance. Both retrofit and rehabilitation address improvements that would be implemented to preserve and ensure continued use of the existing La Loma Bridge. In addition to the proposed retrofit strategies (shown in Figure S-3 of the Final EIR/EA) for the various structural components of the existing bridge, all loose surface concrete would be located and removed to sound concrete, exposed surfaces and reinforcing bar would be thoroughly cleaned and patched with concrete of like color, and architectural features and surface textures would be replicated to the greatest extent practicable using form liners.

The length of the proposed rehabilitated bridge would be the same as the existing bridge. The width of the rehabilitate bridge would be 42 feet, which is 4 feet wider[1] than the existing bridge, including two standard 5-foot-wide sidewalks. The rehabilitated bridge would continue to provide two traffic lanes, one in each direction.

[1] According to AASHTO Standards, Exhibit 5-6, *Minimum Clear Roadway Widths and Design Loadings for New and Reconstructed Bridges* with average daily traffic over 2,000 vehicles, the minimum width is 15 feet (12-foot lane plus 3-foot shoulder). Currently, each lane on La Loma Bridge is 14 feet, 1 foot shy of the standard.

There are two pedestrian/equestrian trails that currently run underneath La Loma Bridge parallel to the channel on each bank. During most of construction period, at least one trail would remain open to through traffic, and pedestrians and equestrians would be protected by a temporary overhead structure. Temporary closures may be necessary at certain times during the construction process.

A temporary platform (most likely constructed of wood) would also be constructed from bank to bank over the Arroyo Seco channel to allow construction workers (but not construction equipment) to access the piers of the bridge and catch any construction debris before it enters the channel and, consequently, affects waters of the United States that are subject to U.S. Army Corps of Engineers (USACOE) jurisdiction.

Construction of the proposed project, which would entail some excavation, grading, bridge reconstruction, road paving, and miscellaneous finish work, would last approximately 18 months. The bridge would be closed to traffic for the entire construction period. Alternative east-west detour routes across the Arroyo Seco would include Colorado Boulevard to the north and Laguna Road to the south.

3 FINDINGS/SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The Final EIR/EA identified several significant environmental effects (or "impacts") that the proposed project (i.e., the preferred Bridge Retrofit and Rehabilitation Alternative) could create. Several of these significant impacts can be reduced to less than significant or insignificant levels through the implementation of feasible mitigation measures. Some significant impacts cannot be avoided through implementation of feasible mitigation measures or feasible environmentally superior alternatives because no mitigation measure exists to mitigate the impact. However, these impacts are outweighed by overriding considerations as set forth in Section 5 below. This section sets forth in detail the findings with respect to significant environmental impacts and the mitigation measures of the proposed project.

3-1 Traffic and Transportation

3-1.1 Significance Criteria

For the purposes of the EIR/EA, the proposed project would have a significant impact under CEQA if it generates traffic that exceeds the City's street segment and intersection criteria identified in Table 1 and Table 2 below, respectively.

Table 1: Street Segment Impact Significance Criteria	
ADT Increase	**Required Traffic Mitigation**
< 2.4%	Staff Review
2.5% - 4.9%	Soft Mitigation
5.0% - 7.4%	Soft Mitigation; Physical Mitigation; Project Alternative
≥7.5%	Soft Mitigation; Extensive Physical Mitigation; Project Alternative

Source: Kaku Associates, City of Pasadena, 2005.

Table 2: City of Pasadena Significant Traffic Impact Criteria	
LOS Under Future Conditions with Project	**V/C Ratio Increase Due to Project Traffic Considered Significant**
A	0.060
B	0.050
C	0.040
D	0.030
E	0.020
F	0.010

Source: Kaku Associates, City of Pasadena, 2005.

3-1.2 Description of Significant Effects

a. Construction-Period Impacts

The bridge would be closed to traffic for a period of approximately 18 months. As a result of the bridge closure, street segments in the project area could experience an increase in traffic due to motorists using alternative routes. An Average Daily Traffic (ADT) segment analysis was conducted, which determined (see Section 3-1.3 of the Final EIR/EA) that a 13.1 percent increase in is projected at the Colorado Boulevard segment, Laguna Road would see a 42.6 percent increase, San Rafael Avenue north of Laguna Road is expected to increase by 65.7 percent, and San Rafael Road west of Arroyo Boulevard is projected to increase by 81.3 percent. By definition, the projected ADT increase at all segments is considered significant.

3-1.3 Proposed Mitigation

T-1 A Traffic Management Plan shall be developed by the City prior to construction to ensure that impacts and disruption to circulation and access are minimized during construction.

T-2 Detours to and from the 134 and 210 freeways in the affected area must be implemented and approved by Caltrans during construction closure.

T-3 Appropriate signs should be installed or covered while the closure is in place and restored once construction is completed.

3-1.4 Finding

(X) **Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.**

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(X) **Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or project alternatives identified in the final EIR.**

3-1.5 Rationale for Finding

Implementation of the mitigation measures above would reduce the traffic disruption and impacts that could occur during construction. Additionally, although the projected ADT increase is defined as a significant impact according to the City's criteria, consideration should be given to the duration of the La Loma Bridge project and the projected levels of service at the analyzed segments. The bridge closure is temporary and expected to last approximately 18 months. Upon completion, the bridge would re-open and resume normal operations. Additionally, the projected levels of service at the analyzed segments are excellent and similar to the existing conditions. Each roadway segment would experience a marginal increase in user capacity due to the temporary bridge closure; utilized capacity would not exceed 60 percent, even under the "with project" conditions. A minimum of 40 percent capacity of each roadway would remain to accommodate traffic under the closed La Loma Bridge conditions. Based on this, the impacts resulting from the bridge closure would be both temporary and minor.

3-1.6 Reference

For a full discussion of traffic impacts, see Section 3-1.3 of the La Loma Bridge Rehabilitation Replacement Project Final EIR/EA.

3-2 Archaeological Resources

3-2.1 Significance Criteria

For the purposes of the EIR/EA, and in accordance with Section 21084.1 of CEQA, the proposed project would have a significant adverse environmental impact under CEQA if it:

- causes a substantial or potentially substantial adverse change in the significance of an archaeological resource.

Cultural resources management work conducted as part of the proposed project shall comply with the CEQA Statutes and the *State CEQA Guidelines*, which direct lead agencies, in this case the City of Pasadena, to first determine whether an archaeological site is an "historically significant" cultural resource. Generally, a cultural resource shall be considered by the lead state agency to be "historically significant" if the resource meets any of the criteria for listing on the California Register of Historical Resources, including the following:

(A) is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) is associated with the lives of persons important in our past;

(C) embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of an important creative individual or possesses high artistic values; or

(D) as yielded, or may be likely to yield, information important in prehistory or history.

The cited statutes and guidelines specify how cultural resources are to be managed in the context of projects such as the proposed La Loma Bridge Rehabilitation Replacement Project. Briefly, archival and field surveys must be conducted, and identified cultural resources must be inventoried and evaluated in prescribed ways. Prehistoric and historical resources deemed "historically significant" must be considered in project planning and development.
Therefore, if potentially important archaeological resources are discovered during implementation of the proposed project, those resources must be inventoried and evaluated to ascertain whether they meet the criteria for listing on the California Register of Historical Resources.

3-2.2 Description of Significant Effect

a. Construction-Period Impacts

The archaeological survey of the La Loma Bridge area of potential effects (APE) located one historic-era archaeological site, 19-003346. However, Extended Phase I testing of site 19-003346 has determined that, within the APE, cultural deposits have been disturbed and deflated and retain little integrity. Because of extensive prior disturbance of the deposits within the APE, this portion of the site lacks integrity and cannot contribute significant historical archaeological data; therefore, the proposed project would have no impact on known significant archaeological resources. The State Historic Preservation Officer (SHPO) is being asked to concur with the following finding in the Historic Property Survey Report (HPSR): "Finding of No Adverse Effect with Standard Conditions – ESAs," according to the Programmatic Agreement between FHWA, the Advisory Committee on Historic Preservation (ACHP), SHPO, and Caltrans regarding compliance with Section 106 of the National Historic Preservation Act, as it pertains to the administration of the Federal-Aid Highway Program in California, Stipulation X.B(2) and 36 CFR 800.5(b).
However, if other yet-undiscovered sites or features or deposits within site 19-003346 are encountered during project-related construction, construction activities could disturb or destroy these resources, a potentially significant impact. Should archaeological resources be encountered, the measures below would mitigate potential effects.

3-2.3 Proposed Mitigation

The following measures shall be implemented to avoid or mitigate project-related significant impacts to archaeological resources that may be encountered during construction of the proposed build alternatives:

AR-1 A certified archaeologist shall monitor all project-related ground disturbing activities. Monitoring may be reduced, at the discretion of the certified archaeological monitor, if it is discovered, based on additional research or initial monitoring, that areas to be disturbed by grading are subsequently determined to have a low potential to contain archaeological resources.

AR-2 The site boundaries shall be fenced beyond the APE to prevent inadvertent intrusions by construction equipment. If construction activity requires staging or "lay down" areas within site boundaries, protective measures must be taken to ensure site integrity in areas outside the APE.

AR-3 If buried cultural resources or additional features associated with site 19-003346 are uncovered during construction, the resident engineer shall halt all work in the vicinity of the archaeological discovery until a qualified archaeologist can assess the significance of the archaeological resource.

AR-4 Provisions for the disposition of recovered prehistoric artifacts shall be made in consultation with culturally affiliated Native Americans.

AR-5 In the event of an accidental discovery of any human remains in a location other than a dedicated cemetery, the steps and procedures specified in Health and Safety Code 7050.5, *State CEQA Guidelines* 15064.5(e), and Public Resources Code 5097.98 shall be implemented.

3-2.4 Finding

(X) **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the final EIR.**

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

( ) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or project alternatives identified in the final EIR.

3-2.5 Rationale for Finding

There are no known significant archaeological resources located in the area that would be disturbed during construction. The mitigation measures above would ensure that any impacts to previously undiscovered or unknown archaeological resources that may be encountered during construction would be reduced to a level less than significant.

3-2.6 Reference

For a full discussion of archaeological resources impacts, see Section 3-1.5 of the La Loma Bridge Rehabilitation Replacement Project Final EIR/EA.

3-3 Paleontological Resources

3-3.1 Significance Criteria

Sedimentary units that are paleontologically sensitive are those units with a high potential for containing important paleontologic resources (i.e., rock units within which vertebrate fossils or important invertebrate fossils have been determined by previous studies to be present or likely to be present). These units include, but are not limited to, sedimentary formations that contain important paleontologic resources anywhere within their geographical extent, as well as sedimentary rock units temporally or lithologically suitable for the preservation of fossils.

Determinations of paleontologic sensitivity must therefore consider not only the potential for yielding abundant vertebrate fossils but also the potential for production of a few important

fossils, large or small, vertebrate or invertebrate that may provide new and important taxonomic, phylogenetic, and/or stratigraphic data. Areas that may contain datable organic remains older than recent and areas that may contain unique new vertebrate deposits, traces, and/or trackways must also be considered paleontologically sensitive.

In the State of California, fossil remains are considered to be limited, nonrenewable, highly sensitive, scientific resources. These resources are afforded protection against adverse impacts under the authority of the following State of California legislation (California Office of Historic Preservation 1983):

California Environmental Quality Act of 1970

(13 Public Resources Code, 21000 et seq.). Requires public agencies and private interests to identify the potential adverse impacts and/or environmental consequences of their proposed project(s) to any object or site important to the scientific annals of California (Division 1, Public Resources Code: 5020.1 [b]).

Guidelines for the Implementation of CEQA (as amended 1 January 1999)

(*State CEQA Guidelines* Sec. 15064.5(a)(3)). Provides protection for paleontologic resources by requiring that they be identified and mitigated as historical resources under CEQA. The *State CEQA Guidelines* define historical resources broadly to include any object, site, area, or place that a lead agency determines to be historically significant. The regulation goes on to provide that, generally, a resource shall be considered "historically significant" if it has yielded or may be likely to yield information important in prehistory. Paleontologic resources fall within this broad category and additionally are included in the CEQA checklist under "Cultural Resources."

Fossils can be considered to be of substantial scientific interest if one or more of the following criteria apply:

1. The fossils provide data on the evolutionary relationships and developmental trends among organisms, both living and extinct;
2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
3. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas;
4. The fossils demonstrate unusual or spectacular circumstances in the history of life; and/or
5. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation and are not found in other geographic locations.

Therefore, based on the above statutes, and for the purposes of the EIR/EA, the proposed project would have a significant effect on the environment under CEQA if it:

- directly or indirectly destroys a unique paleontological resource or site.

3-3.2 Description of Significant Effect

a. Construction-Period Impacts

Results of previous paleontologic studies in the vicinity of the proposed project indicate that the bridge alignment crosses bedrock mapped as the Topanga Formation, as well as recent alluvium and metamorphic quartz diorite. Excavations in the Topanga Formation on the western abutment of La Loma Bridge or in the older alluvium on both the western and eastern slopes of the Arroyo Seco may uncover significant vertebrate fossils. Therefore, there is a high probability that unique paleontological resources are present on the project site. If resources are encountered, they could be destroyed during project-related, ground-disturbing construction-period activities. Excavations in these areas should be monitored for fossil resources. If resources are encountered and destroyed during project-related, ground-disturbing construction-period activities, the impact would be significant under CEQA. Should unique paleontologic resources be encountered, the measures below would mitigate potential impacts.

3-3.3 Proposed Mitigation

The following measures shall be implemented to ensure that potential impacts to any unique paleontologic resources that may be present would be reduced to a level of insignificance under CEQA.

PR-1 Excavation shall be monitored by a qualified paleontologic monitor in areas (i.e., Topanga Formation, older alluvium) identified as likely to contain paleontologic resources. The monitor shall be equipped to salvage fossils and samples of sediments as they are unearthed to avoid construction delays. The resident engineer shall temporarily halt or divert equipment to allow removal of abundant or large specimens. Monitoring may be reduced if the potentially fossiliferous units, previously described, are not found to be present or, if present, are determined by qualified paleontologic personnel to have a low potential to contain fossil resources.

If paleontological resources are uncovered during construction, the following measures shall be implemented:

PR-2 Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Identification shall include an assessment by a qualified paleontologist to determine if a recovered specimen qualifies for protection as a unique or "historical resource" under Section 15064.5 of the Public Resources Code.

PR-3 Unique specimens worthy of preservation shall be curated into a professional, accredited museum repository with permanent retrievable storage.

PR-4 A report of findings, with an appended itemized inventory of specimens, shall be prepared. The report and inventory, when submitted to the City, would signify completion of the program to mitigate impacts to paleontologic resources.

3-3.4 Finding

(X) **Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the final EIR.**

( ) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

( ) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible mitigation measures or project alternatives identified in the final EIR.

3-3.5 Rationale for Finding

There is a high probability that unique paleontological resources are present on the project site. If resources are encountered and destroyed during project-related, ground-disturbing construction-period activities, the impact would be significant under CEQA. The measures listed above will ensure that potential impacts to any unique paleontologic resources that may be present would be reduced to a level of insignificance under CEQA.

3-3.6 Reference

For a full discussion of paleontological resources impacts, see Section 3-1.9 of the La Loma Bridge Rehabilitation Replacement Project Final EIR/EA.

3-4 Air Quality

3-4.1 Significance Criteria

A project's air quality impacts can be separated into short-term impacts due to construction and long-term permanent impacts from project operations. Determination of a significant impact is the responsibility of the lead agency, which is the City of Pasadena.

For air quality, the City relies on significance thresholds recommended by the South Coast Air Quality Management District (SCAQMD) in its CEQA air quality handbook (the *SCAQMD CEQA Air Quality Handbook*), as revised in November 1993 and approved by the SCAQMD's Board of Directors.

The SCAQMD's emission thresholds apply to all federally regulated air pollutants except lead, which is not exceeded in the Basin. Construction and operational emissions are considered by the SCAQMD to be significant if they exceed the thresholds shown in Table 3.

Table 3: Emissions Thresholds of Significance

Pollutant	Construction		Operation
	pounds/day	tons/quarter	pounds/day
Carbon Monoxide (CO)	550	24.75	550
Sulfur Oxides (SO_x)	150	6.75	150
Particulate Matter (PM_{10})	150	6.75	150
Nitrogen Oxides (NOx)	100	2.5	55
Volatile organic compounds (VOC)	75	2.5	55

Source: SCAQMD CEQA Air Quality Handbook, 1993.

Peak quarter emissions need not be considered in determining significance if a project already exceeds peak day construction thresholds unless proposed mitigation lowers peak day emissions to less than significant but may not be sufficient to reduce peak quarter emissions below the threshold. In that case, additional mitigation may be necessary.

Therefore, for the purposes of the analyses in this EIR/EA, the proposed project would have a significant environmental impact under CEQA if it would:

- Generate emissions that exceed the thresholds shown in Table 3.
- Cause the exceedance of a CO standard or result in increases in CO concentrations in an area that already exceeds national or state CO standards by greater than 1 part per million (ppm) averaged over 1 hour or 0.45 ppm averaged over 8 hours.
- Conflict with or obstruct implementation of the applicable air quality plan.
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- Expose sensitive receptors to substantial pollutant concentrations.
- Create objectionable odors affecting a substantial number of people.