3.3 AIR QUALITY

AIR QUALITY - Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the Project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

3.3.1 Environmental Setting

3.3.1.1 Local Climate and Meteorology

The Project is located within the South Central Coast Air Basin. The climate, meteorology, air quality, and air quality trends of the area have been described in detail in several planning and environmental documents, and are best summarized in the Santa Barbara County Air Pollution Control District (SBCAPCD) 2010 Clean Air Plan (CAP) (SBCAPCD 2010). The County can be described as having a Mediterranean climate, characterized by warm, dry summers and cooler mildly damp winters. The unique combination of prevailing wind conditions generated by a persistent offshore high pressure system and the topography of coastal mountains results in variations of airflow that are conducive to the formation and retention of air pollutants.

3.3.1.2 Criteria Pollutants

Criteria air pollutants are those contaminants for which ambient air quality standards have been established for the protection of public health and welfare. Criteria pollutants include: ozone (O_3) carbon monoxide (CO), oxides of nitrogen (NO_X), sulfur dioxide (SO_2), particulate matter with a diameter of 10 microns or less (PM_{10}) and particulate matter with a diameter of 2.5 microns or less ($PM_{2.5}$).

Ozone. O_3 is formed in the atmosphere through complex photochemical reactions involving NO_X, reactive organic gases (ROG) (also known as ROC's, reactive organic compounds), and sunlight occurring over several hours. Since ozone is not emitted directly into the atmosphere, but is formed as a result of photochemical reactions, it is classified as a secondary or regional pollutant. Because these ozone-forming reactions take time, peak ozone levels are often found downwind of major source areas. Ozone is considered a respiratory irritant and prolonged exposure can reduce lung function, aggravate asthma, and increase susceptibility to respiratory infections. Children and those with existing respiratory diseases are at greatest risk from exposure to ozone.

Carbon Monoxide. CO is primarily formed through the incomplete combustion of organic fuels. Higher CO values are generally measured during winter when dispersion is limited by morning surface inversions. Seasonal and diurnal variations in meteorological conditions lead to lower values in summer and in the afternoon. CO is an odorless, colorless gas. CO affects red blood cells in the body by binding to hemoglobin and reducing the amount of oxygen that can be carried to the body's organs and tissues. CO can cause health effects to those with cardiovascular disease, and also can affect mental alertness and vision.

Nitric Oxide (NO). NO is a colorless gas formed during combustion processes which rapidly oxidize to form nitrogen dioxide (NO_2), a brownish gas. The highest nitrogen dioxide values are generally measured in urbanized areas with heavy traffic. Exposure to NO_2 may increase the potential for respiratory infections in children and cause difficulty in breathing even among healthy persons and especially among asthmatics.

Sulfur Dioxide. SO_2 is a colorless, reactive gas that is produced from the burning of sulfur-containing fuels such as coal and oil, and by other industrial processes. Generally, the highest concentrations of SO_2 are found near large industrial sources. SO_2 is a respiratory irritant that can cause narrowing of the airways, leading to wheezing and shortness of breath. Long-term exposure to SO_2 can cause respiratory illness and aggravate existing cardiovascular disease.

Particulate Matter. Ambient air quality standards have been set for PM_{10} and $PM_{2.5}$. Both consist of different types of particles suspended in the air, such as: metal, soot, smoke, dust and fine mineral particles. Depending on the source of particulates, toxicity and chemical activity can vary. The primary source of PM_{10} emissions appears to be soil via roads, construction, agriculture, and natural windblown dust; other sources include sea salt, combustion processes (such as those in gasoline or diesel vehicles), and wood burning. Fugitive emissions from construction sites, wood stoves, fireplaces and diesel truck exhaust are primary sources of $PM_{2.5}$. Particulate matter is a health concern because when inhaled it can cause permanent damage the lungs; both sizes of particulates can be dangerous when inhaled, however, $PM_{2.5}$ tends to be more damaging because it remains in the lungs once it is inhaled.

3.3.2 Regulatory Setting

3.3.2.1 Federal and State

Federal and State laws and regulations pertaining to this issue area and relevant to the Project are identified in Table 3.3-1 and summarized below.

Table 3.3-1. Laws, Regulations, and Policies (Air Quality)

U.S.	Federal Clean Air Act (FCAA) (42 USC 7401 et seq.)	The FCAA requires the U.S. Environmental Protection Agency (USEPA) to identify National Ambient Air Quality Standards (NAAQS) to protect public health and welfare. National standards are established for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (PM_{10} and $PM_{2.5}$), and lead (Pb). In 2007, the U.S. Supreme Court ruled that carbon dioxide (CO_2) is an air pollutant as defined under the FCAA, and that the USEPA has authority to regulate GHG emissions. Pursuant to the 1990 FCAA Amendments, USEPA classifies air basins (or portions thereof) as in "attainment" or "nonattainment" for each criteria air pollutant, based on whether or not the NAAQS are achieved. The classification is determined by comparing monitoring data with State and Federal standards. • An area is classified as in "attainment" for a pollutant if the pollutant concentration is lower than the standard. • An area is classified as in "nonattainment" for a pollutant if the pollutant concentration exceeds the standard. • An area is designated "unclassified" for a pollutant if there are not enough data available for comparisons.
CA	California Clean Air Act of 1988 (CCAA) (Assembly Bill [AB] 2595)	The CCAA requires all air districts in the State to endeavor to achieve and maintain State ambient air quality standards for O_3, CO, SO_2, NO_2, and PM; attainment plans for areas that did not demonstrate attainment of State standards until after 1997 must specify emission reduction strategies and meet milestones to implement emission controls and achieve more healthful air quality. The 1992 CCAA Amendments divide O_3 nonattainment areas into four categories of pollutant levels (moderate, serious, severe, and extreme) to which progressively more stringent requirements apply. State ambient air standards are generally stricter than national standards for the same pollutants; California also has standards for sulfates, hydrogen sulfide (H_2S), vinyl chloride, and visibility-reducing particles.
CA	Coastal Act Chapter 3 policies (see also Table 1-3)	Section 30253, subdivision (c) requires that new development shall be consistent with requirements imposed by an air pollution control district or the State Air Resources Board as to each particular development.
CA	Other	• Under California's Diesel Fuel Regulations, diesel fuel used in motor vehicles, except harbor craft, has been limited to 500 parts per million (ppm) sulfur since 1993. The sulfur limit was reduced to 15 ppm beginning September 1, 2006, and harbor craft were included starting in 2009. • CARB's Heavy Duty Diesel Truck Idling Rule (Cal. Code Regs., tit. 13, § 2485) prohibits heavy-duty diesel trucks from idling for longer than 5 minutes at a time (except while queuing, provided the queue is located beyond 100 feet from any homes or schools). • The Statewide Portable Equipment Registration Program (PERP) regulates portable engines/engine-driven equipment units. Once registered in the PERP, engines and equipment units may operate throughout California without the need to obtain individual permits from local air districts (CARB 2010).

Air pollution control is administered on three governmental levels. The United States Environmental Protection Agency (USEPA) has jurisdiction under the Federal Clean Air Act (FCAA). The California Air Resources Board (CARB) has jurisdiction under the California Health and Safety Code and California Clean Air Act. The SBCAPCD shares responsibility with the CARB for ensuring that all ambient air quality standards are attained within the County. The SBCAPCD has jurisdiction under the California Health and Safety Code to develop emission standards (rules) for the County, issue air pollution permits, and require emission controls for stationary sources in the County. The SBCAPCD is also responsible for the attainment of air quality standards in the County. The USEPA and CARB classify an air basin as attainment, unclassified, or nonattainment, depending on the results of the monitored ambient air quality. The OPSR-B site is located within the jurisdiction of the SBCAPCD and within the Santa Barbara County Air Basin. The Santa Barbara County Air Basin is designated as unclassifiable/attainment for the 2008 Federal 8-hour ozone standard and Federal $PM_{2.5}$ standard. The County violates the State 8-hour ozone standard and PM_{10} standard (SBCAPCD 2010a).

3.3.2.2 Local

As discussed above, the SBCAPCD is the local agency primarily responsible for attaining the air quality standards established by the CARB and the USEPA. The SBCAPCD implements programs and regulations to control air pollution released from stationary sources within the District, as well as implementing programs to encourage alternative means of transportation. Sources of air pollution associated with the OPSR-B would be mobile, including onshore heavy equipment, transfer dump trucks, cement trucks, marine vessels and associated onboard equipment.

Currently, neither the County nor the SBCAPCD has daily or quarterly quantifiable emission thresholds established for short-term construction emissions. PM_{10} impacts from dust emissions should be discussed and standard mitigation measures implemented (e.g., watering) as required in the County of Santa Barbara Environmental Thresholds and Guidelines Manual (2008). Quantitative thresholds of significance are not currently in place for short-term or construction emissions. However, the SBCAPCD considers construction projects that would require emission offsets to be significant. SBCAPCD Rule 202 (related to permits and offset requirements and exemptions), Section D.16, requires that:

> *Notwithstanding any exemption in these rules and regulations [Rule 202], if the combined emissions from all construction equipment used to construct a stationary source which requires an Authority to Construct have a projected actual in excess of 25 tons of any pollutant, except carbon monoxide, in a 12 month period, the owner of the stationary source shall provide offsets….*

SBCAPCD Rules and Regulations. Under Rule 202.F.7, marine vessels used in cable laying projects are subject to a 25-ton emission limitation in a 12-month period. Projects meeting these criteria may be required to obtain a permit from the SBCAPCD in accordance with Rule 202.F.7; however, eligible projects are exempt from the requirement to comply with Best Available Control Technology (BACT) or provide emission offsets pursuant to SBCAPCD Rule 804. ExxonMobil will submit a permit application to the SBCAPCD to demonstrate that the anticipated actual annual emission for the Project will be below the 25 tons per year (tons/year) threshold.

Air Quality Standards. Air quality standards are specific concentrations of pollutants that are used as thresholds to protect public health and the public welfare. The USEPA has developed two sets of standards; one to provide an adequate margin of safety to protect human health, and the second to protect the public welfare from any known or anticipated adverse effects. At this time, sulfur dioxide is the only pollutant for which the two standards differ. The CARB has developed air quality standards for California, which are generally lower in concentration than Federal standards. California standards exist for O_3, CO, suspended PM_{10}, visibility, sulfates, lead, hydrogen sulfide, and vinyl chloride. In July 1997, the USEPA finalized new health-based O_3 and PM standards. However, due to several lawsuits, the standards were not fully implemented until February 2001. The new Federal O_3 standard is based on a longer averaging period (8-hour vs. 1-hour), recognizing that prolonged exposure is more damaging. The new Federal PM standard is based on finer particles (2.5 microns and smaller vs. 10 microns and smaller), recognizing that finer particles may have a higher residence time in the lungs and cause greater respiratory illness. Table 3.3-2 lists applicable ambient air quality standards.

Table 3.3-2. Ambient Air Quality Standards (State and Federal)

Pollutant		Averaging Time	California Standard	Federal Standard
Ozone (O_3)		1-Hour	0.09 ppm	--
		8-Hour	0.070 ppm	0.075 ppm
Carbon Monoxide (CO)		8-Hour	9.0 ppm	9 ppm
		1-Hour	20 ppm	35 ppm
Nitrogen Dioxide (NO_2)		Annual Arithmetic Mean	0.030 ppm	0.053 ppm
		1-Hour	0.18 ppm	--
Sulfur Dioxide (SO_2)		Annual Arithmetic Mean	--	0.030 ppm
		24-Hour	0.04 ppm	0.14 ppm
		3-Hour	--	0.5 ppm (secondary)
		1-Hour	0.25 ppm	--
Respirable Particulate Matter	PM_{10}	Annual Geometric Mean	20 µg/m^3	--
		24-Hour	50 µg/m^3	150 µg/m^3
Fine Particulate Matter	$PM_{2.5}$	Annual Geometric Mean	12 µg/m^3	15.0 µg/m^3
		24-Hour	--	35 µg/m^3

Pollutant	Averaging Time	California Standard	Federal Standard
Hydrogen Sulfide (H_2S)	1-Hour	0.03 ppm	--
Vinyl Chloride	24 Hour	0.01 ppm	--
Sulfates	24 Hour	25 µg/m^3	--
Lead		30 day average: 25 µg/m^3	Rolling 3-month Average: 0.15 µg/m^3 Calendar quarter: 1.5 µg/m^3
Visibility Reducing Particles	8-Hour	Extinction coefficient of 0.23 per km - visibility of ten miles or more due to particles when relative humidity is less than 70 percent.	--

Source: CARB 2013

Air Toxic Health Risks. The combustion of diesel fuel in internal combustion engines produces exhaust containing a number of compounds that have been identified as hazardous air pollutants by the USEPA and toxic air contaminants (TACs) by the CARB. Particulate matter from diesel exhaust has recently been identified as a TAC. In 2000, the CARB developed the *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles* to establish new emission standards, certification programs, and engine retrofit programs to control exhaust emissions from diesel engines and vehicles. The projected benefits of this plan are reductions in diesel particulate emissions and associated cancer risks of 75 percent by 2010 and 85 percent by 2020 (CARB 2004). The CARB has passed new fuel standards that will enable diesel engines to incorporate new advanced technologies to meet dramatically lower emission levels. The new sulfur standard, was phased in starting in June 2006, aligns California diesel fuel sulfur standards with Federal diesel sulfur standards, which require a sulfur limit of 15 parts per million. California's rule will apply to fuel sold for both on-road and off-road vehicles (excluding locomotives and marine vessels).

3.3.3 Impact Analysis

a) Conflict with or obstruct implementation of the applicable air quality plan?

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

a)- c). Less than Significant with Mitigation. Please refer to Appendix F for a copy of the Air Quality Spreadsheets supporting this analysis.

The Project would involve the total retrieval of approximately 12 to 18 miles (19.3 to 29 km) of power cable, and installation of approximately 30 miles (49 km) of replacement cable in the vicinity of the SYU facilities. Project emissions would occur from both onshore and offshore work activities. Offshore and onshore activities are expected to occur concurrently for a maximum of three quarters of the Project (from first quarter 2015 through 3rd quarter 2015).

Impacts from offshore activities will result from the use of the cable installation vessel (CIV), support tug and one or more diver support vessels, and survey, mooring and transfer vessels for the cable retrieval activities. Other offshore emission impacts would result from the equipment to be used on the offshore Project platforms for cable retrieval and cable installation to include generators, portable lights, winches, and other diesel powered stationary and portable equipment.

Onshore Impacts to air quality would result from equipment used for the excavation of earth and materials adjacent to the conduit tunnel at the lower end of Las Flores Canyon. Onshore equipment includes various pieces of diesel powered construction equipment including medium and heavy duty trucks, winches, backhoes, front end loaders, air compressors, generators and other necessary equipment. It is expected that these pieces of equipment would be exempted from permit by SBCAPCD Rule 202.F.1 or 202.F.2. Worker commute trips and supply/equipment delivery trip impacts to the County would be considered to be minimal due to the short duration of the Project.

Emissions resulting from Project equipment and vessels will increase local concentrations of pollutants. The primary regulated pollutants of concern in the County are NO_x and ROG. Both NO_x and ROG are considered precursors to ozone formation, for which the County is in nonattainment for the State ozone standard. Project criteria pollutant estimates are included in Table 3.3-3 (Estimated Criteria Pollutant Total Project Emissions). As shown in the table, the Project's total cumulative emissions are estimated to be approximately:

- 24.86 tons/year for NO_X;
- 7.18 tons/year for ROG;
- 3.67 tons/year for PM;
- 37.63 tons/year for CO; and
- 1.12 tons/year for SO_2.

As discussed above, the SBCAPCD is the local agency responsible for attaining the air quality standards established by the CARB and USEPA. The SBCAPCD implements programs and plan regulations including rule 202.F.7 which requires emissions to be below the 25 tons/year threshold for any one pollutant (NO_x, ROG, PM, SO_2). Based on the estimated emissions shown in Table 3.3-3, criteria pollutants associated with the Project will be below existing air quality thresholds.

Table 3.3-3. Estimated Criteria Pollutant Total Project Emissions

EMISSIONS SUMMARY		NO_x	ROG	PM	CO	SO_2
Onshore	Pounds/Day	114.16	6.68	6.01	138.46	0.21
	Tons	5.75	0.35	0.31	6.98	0.01
Offshore Platform Work	Pounds/Day	164.14	7.57	12.76	233.26	0.31
	Tons	6.16	0.28	0.48	8.75	0.01
Cable Retrieval and Installation (Marine Vessel Emissions)	Pounds/Day	1,545.94	439.26	177.17	1,696.16	75.27
	Tons	12.95	6.55	2.88	21.90	1.10
Demolition activities exempt from offsets / cable retrieval of out of service cables	Pounds/Day	Included in Offshore Above				
	Tons	3.29	2.27	1.01	7.29	0.38
TOTAL - PROJECT AIR EMISSIONS		**NO_x**	**ROG**	**PM**	**CO**	**SO_2**
TOTAL EMISSIONS TONS/YR		28.15	9.45	4.68	44.92	1.50
TOTAL CUMULATIVE EMISSIONS TONS/YR		**24.86**	**7.18**	**3.67**	**37.63**	**1.12**

Although Project emissions are estimated to be below existing thresholds and in compliance with existing plans and programs, the Project will still be required to submit a permit application to the SBCAPCD to demonstrate that the anticipated actual annual emission for the Project will be below the 25 tons/year threshold. An Emissions Reporting Plan (ER Plan) is typically required by the SBCAPCD as part of that permitting process. Cable retrieval and installation phases of the Project are subject to permit; however, they are exempt from the New Source Review Provisions as specified under SBCAPCD Rule 202.F.7 provided the actual emissions of the cable installation vessels and associated engines stays below 25 tons in a consecutive 12-month period. The 25-ton emission limitation contained in the aforementioned rules is the level below which the SBCAPCD considers that projects of this type and duration would result in less than significant air quality impacts.

ExxonMobil shall implement the following MMs to mitigate potential air quality impacts to less than significant:

MM AQ-1: Emissions Reporting Plan (ER Plan). ExxonMobil shall prepare an ER Plan to be submitted to the Bureau of Safety and Environmental Enforcement (BSEE) and the Santa Barbara County Air Pollution Control District (SBCAPCD), for review and approval 60 days prior to commencement of cable retrieval or installation activities. The ER Plan shall include:

- Detailed information of onshore activities, inclusive of internal combustion engine use, duration of use, fuel consumed, and calculated emissions.
- Detailed information of offshore activities, inclusive of engine use, methods to measure fuel consumption, and calculated emissions from the dynamically positioned cable installation vessel and associated equipment used in the retrieval and installation of the cables.

- Process for preparation and submittal of daily fuel use and emissions data from the retrieval and installation of the cables (when within 25 miles of Santa Ynez Unit (SYU) facilities, which shall be provided to BSEE and the SBCAPCD.
- Statement that a summary of the daily and total fuel use and emissions associated with the Project shall be submitted to Santa Barbara County to verify compliance with SBCAPCD rules and regulations and Project-specific permit conditions within 60 days of Project completion.
- An air quality contingency plan (AQC Plan) that identifies potential measures that could be implemented by the contractors to reduce, defer or eliminate emissions without adversely impacting safety or Project completion.

MM AQ-2: Low-Sulfur Fuels. ExxonMobil shall require all cable retrieval and installation vessels and other associated internal combustion engines to use fuel with less than 0.0015 percent sulfur by weight (15 parts per million) when operating within Santa Barbara County, consistent with Santa Barbara County Air Pollution Control District requirements.

MM AQ-3: Construction Emissions Reduction. The Applicant shall implement the following measures as required by State law:

- All portable diesel-powered construction equipment shall be registered with the State's portable equipment registration program OR shall obtain an Air Pollution Control District permit.
- Fleet owners of mobile construction equipment are subject to the California Air Resources Board (CARB) Regulation for In-use Off-road Diesel Vehicles (the purpose of which is to reduce diesel particulate matter and criteria pollutant emissions from in-use [existing] off-road diesel-fueled vehicles).
- All commercial diesel vehicles are limited to an engine idling time of five minutes while loading and unloading; electric auxiliary power units should be used whenever possible.

The following measures shall be implemented to the maximum extent feasible:

- Diesel construction equipment meeting the CARB Tier 1 emission standards for off-road heavy-duty diesel engines shall be used. Equipment meeting CARB Tier 2 or higher emission standards should be used to the maximum extent feasible.
- Diesel powered equipment should be replaced by electric equipment whenever feasible.
- If feasible, diesel construction equipment shall be equipped with selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by the Environmental Protection Agency or California.

- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained in tune per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size.
- The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.

The Emission Reporting Plan would be used to limit equipment usage and Project duration to ensure compliance with Rule 202.F.7 limiting Project emissions to less than 25 tons of any affected pollutant during any consecutive 12-month period. Emission limitations placed upon the Project would be additionally assured by daily monitoring of emissions to ensure compliance with SBCAPCD threshold levels. Threshold levels would be preserved through identified contingency measures to be implemented for the Project, if the Project reaches 80 percent of the emission limitation as identified in the daily monitoring reports. The contingency measures would be implemented when actual emissions generated to date plus the projected emissions required to complete the Project exceed 20 tons. The potential for violations of the ambient air standards would be further minimized through implementation of the aforementioned Project conditions to mitigate emissions associated with the Project.

In addition to criteria pollutants, dust mitigation measures can further minimize particulate matter impacts resulting from the grading required during the Project. Given the Project location and minimal volume of earth to be moved, ambient particulate matter standards would not be expected to be exceeded. However, ExxonMobil shall implement the following MMs to help further reduce potential impacts to air quality associated with dust generation to less than significant.

MM AQ-4: Dust Control Measures. Dust generated by onshore construction activities shall be kept to a minimum with a goal of retaining dust on site. During construction, clearing, grading, earth moving, excavation, or transportation, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and create a crust after each day's activities cease. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day.

Additionally, the following measures shall be implemented to further reduce the potential for dust generation on site:

- Increased watering frequency should be required whenever the wind speed exceeds 15 miles per hour (mph).
- Minimize amount of disturbed area and reduce on site vehicle speeds to 15 mph or less.
- If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.
- After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors in the general Project vicinity are rural residences and recreationalists enjoying Refugio and El Capitan SB Parks. The Project site is located in an agriculturally and recreationally zoned area with few residences; the closest residence is approximately 1 mile southwest of the Project site. Given the minimal emission impact from onshore activities along with the lack of nearby residences health risk impact would result in a less than significant impact.

e) Create objectionable odors affecting a substantial number of people?

Less than Significant Impact. Project construction equipment will generate odors from the combustion of fuels. However, the presence of an impact from Project odors is dependent on a number of variables. This includes:

- Nature of the odor source;
- Frequency of odor generation (e.g., daily, seasonal, activity-specific);
- Intensity of the odor (e.g., concentration);
- Distance of the odor source to sensitive receptors (e.g., miles);
- Wind direction (e.g., upwind or downwind); and
- Sensitivity of the receptor.

Onshore Project activities would primarily take place in an open area within the LFCPF. The LFCPF is located within a private, gated property with no nearby sensitive receptors. Work activities with the tunnel would require some odor-causing equipment to be in use; however, these impacts would be temporary and limited to minor pieces of equipment located within an open area not directly accessible by the public. Similarly, offshore Project equipment would be located within open deck spaces of Project vessels and Project platforms away from sensitive receptors and public areas. Odors would be minor, and would dissipate quickly in the open air. Therefore, impacts would be less than significant.

3.3.4 Mitigation Summary

ExxonMobil is proposing the following mitigation measures to be implemented to further reduce and minimize impacts to air quality.

- MM AQ-1: Emissions Reporting Plan.
- MM AQ-2: Low-Sulfur Fuels.
- MM AQ-3: Construction Emissions Reduction.
- MM AQ-4: Dust Control Measures.